




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1051877	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1054940
Business name (Company name):	Metro Knitting & Dyeing Mills Ltd.		
Site name:	Metro Knitting & Dyeing Mills Ltd.		
Site address: <i>(Please include full address)</i>	Ramarbag, Kutubpur, Fatulla, Narayanganj	Country:	Bangladesh
Site contact and job title:	Gaur Nitai Datta- AGM (HR, Admin & Compliance)		
Site phone:	+88027647649-50 +8801730007561	Site e-mail:	nitai.hr@metrokd.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	9 th & 10 th March, 2022		

Audit Company Name & Logo:  SGS Bangladesh Limited	Report Owner (payer): Metro Knitting & Dyeing Mills Ltd.
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Imran Ahmed

APSCA number: RA 21701483

Lead auditor APSCA status: RA (In Good Standing)

Team auditor: Imtiaz Khan & Taslima Rahman Tafsir
21703754

APSCA number: RA 21701631 & RA

Interviewers: Imran Ahmed, Imtiaz Khan & Taslima Rahman Tafsir APSCA number: RA 21701483, RA 21701631 & RA 21703754

Report writer: Imran Ahmed

Report reviewer: Sifat Rizwana Trisa

Date of declaration: 10th March 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				None observed
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	14			NC: <ul style="list-style-type: none"> Workers were not using sufficient PPE (Personal protective equipment). Insufficient risk assessment. Health centre is not found as per law. Building approval not taken from concern authority. 01 side handrail was missing. No Generator license found. MSDS, secondary containment and labeling was not ensured for chemical/machine oil. Insufficient dining capacity Few areas not included and mismatch in Floor layout plan.

									<ul style="list-style-type: none"> ● Evacuation plan was not posted and mismatch ● Machine safety guard found displaced. ● Aisles & workers were partially obstructed. ● Boiler certificate expired. ● Night fire drill was not held in a regular basis.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			3	GE: <ul style="list-style-type: none"> ● Facility provides attendance bonus BDT 400 for all workers as per company policy. ● Facility provides education scholarship for the workers children. ● Facility arranges annual picnic.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1			NC: <ul style="list-style-type: none"> ● Improper waste management.

10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> • None observed
General observations and summary of the site:									
<p>The factory produces all kinds of knit items. There are total 4837 employees in the facility with 2903 male and 1934 female employees.</p> <p>2. Factory has a policy to endorse at the highest level, covering human rights impacts and issues, and ensures it is communicated to all employees.</p> <p>3. Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labor was observed.</p> <p>4. Facility does not engage any forced or bonded labor. In Bangladesh, no prison labor is engaged outside the prison according to the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.</p> <p>5. Factory treats their workers with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse are practiced.</p> <p>6. Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents verification and nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.</p> <p>7. No trade union has been formed by the workers of the factory. Workers are free to join or form the trade union, no restriction has been imposed to the workers from the management. Nothing identified through policy verification. Moreover, factory has formed a Participation Committee (PC) as parallel means. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any.</p> <p>8. First aid facility and toilet facilities have been found as per legal requirement. First aiders were well known about the first aid issues and fire fighters are well known about the operation of all firefighting equipment and regular training is provided to them regarding this.</p> <p>9. All workers are getting ID card during their recruitment. All the workers are receiving contract letter.</p> <p>10. It was verified through document review, factory tour, management interview and employee interview that no Homeworking was used by this factory.</p> <p>11. The factory implemented anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory.</p> <p>12. Workers have received overtime allowance at premium rate (double of the basic). Workers are getting day off on Friday as weekly holiday.</p> <p>13. All workers were provided with pay slips for each pay period which is in easily understandable language to all workers.</p>									

**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:	Metro Knitting & Dyeing Mills Ltd.		
B: Site name:	Metro Knitting & Dyeing Mills Ltd.		
C: GPS location: (If available)	<table border="1"> <tr> <td>GPS Address:</td> <td>Latitude: 23.6454481 Longitude: 90.4860392</td> </tr> </table>	GPS Address:	Latitude: 23.6454481 Longitude: 90.4860392
GPS Address:	Latitude: 23.6454481 Longitude: 90.4860392		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Factory License: License number: 11236/ Narayanganj; Category is 'k'; Valid up to 30 June 2022; issued by Chief Inspector of Factories, Govt. of the People's Republic of Bangladesh.</p> <p>Trade Licenses: License issue serial number: 03, issued by Kutubpur Union Council which is valid up to 30 June 2022.</p> <p>Fire License: License number: DD/Dhaka/17396/2003; DD/Dhaka/22574/2011; DD/Dhaka/22575/2011; DD/Dhaka/23177/2012; DD/Dhaka/25886/ 2016; DD/Dhaka/22572/2011; DD/Dhaka/25887/2016; DD/Dhaka/19625/2006. DD/Dhaka/22576/2011; DD/Dhaka/23175/2012. DD/Dhaka/22573/2011; Issued by Fire Service and Civil Defence Department which is valid up to 30 June 2022.</p>		
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kinds of Knit items.		
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Metro Knitting & Dyeing Mills Ltd. is a 100% export-oriented all kinds of Knit items manufacturer located at Ramarbag, Kutubpur, Fatullah, Narayanganj, Bangladesh. The facility started its operation since 2000 in the same location. Total land area occupied by this facility was about 389,320 square feet where production area was about 568,215 square feet and warehouse area was around 372,410 square feet.</p> <p>Main product of the facility was all kinds of Knit items and production capacity were 910,000 pieces per month for readymade garments, 650,000 pieces per month for washing, 1170 tons for dyeing, 1248 tons for knitting and 520 tons for all over printing per month.</p> <p>The facility premise consists of total 13 buildings and 04 sheds. There is another factory named" Bea-con Knitwear Limited" located in the factory premises under same management and same owner. Some areas of the buildings and sheds were shared by both facilities.</p>		

Detail description of the buildings and sheds is as follows-

Building-1 (07 storied)	Description	Remark, if any
Ground Floor	Warehouse (dyes chemical), dyeing finishing, office & batch section, sample & embroidery	Used by audited factory
1st Floor	Corporate office.	Shared with Bea-con Knitwear Ltd.
2nd Floor	Corporate office.	Shared with Bea-con Knitwear Ltd.
3rd Floor	Cutting	Used by Bea-con Knitwear Ltd.
4th floor	Sewing section used for Bea-con Knitwear Ltd. and Finishing section, maintenance room, spot removing room, used for audited factory.	Shared with Bea-con Knitwear Ltd.
5th floor	Cutting section, Office & 4% open space	Used by Bea-con Knitwear Ltd.
6th floor	Store, dining and prayer room	Used by Bea-con Knitwear Ltd.
Roof top	100% vacant.	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.

Building-2 (07 storied)	Description	Remark, if any
Ground Floor	Fabric warehouse and fire control room	Shared with Bea-con Knitwear Ltd.
1st Floor	Dining, prayer room and finished goods.	Shared with Bea-con Knitwear Ltd.
2nd Floor	Finished goods store	Shared with Bea-con Knitwear Ltd.
3rd Floor	Finishing and Packing section	Used by audited factory
4th floor	Spot removing room, Finishing, and packing section	Used by audited factory
5th floor	Sewing section	Used by Bea-con Knitwear Ltd.

6 th floor	Prayer room, printing (hand), maintenance	Used by Bea-con Knitwear Ltd.
Roof top	100% vacant.	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.
Building-3 (07 storied)	Description	Remark, if any
Ground Floor	Chemical store	Shared with Bea-con Knitwear Ltd.
1st Floor	Accessories store	Shared with Bea-con Knitwear Ltd.
2 nd Floor	Sample section (sewing)	Used by audited factory
3 rd Floor	Sample section (CAD) & Office	Used by audited factory
4 th floor	Sample section (Cutting & Finishing).	Used by audited factory
5 th floor	Fabric store	Shared with Bea-con Knitwear Ltd.
6 th floor	Fabric store	Shared with Bea-con Knitwear Ltd.
Roof top	100% vacant.	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.
Building-4 (08 storied)	Description	Remark, if any
Ground Floor	Dyeing section (Bea-con Knitwear Ltd.)	Used by Bea-con Knitwear Ltd.
1st Floor	Warehouse (Chemicals), Lab, & compressor	Shared with Bea-con Knitwear Ltd.
2 nd Floor	R&D, dining, canteen & prayer room and fabric store.	Shared with Bea-con Knitwear Ltd.
3 rd Floor	Accessories store	Shared with Bea-con Knitwear Ltd.
4 th floor	Cutting section	Used by audited factory
5 th floor	Sewing & finishing section (Iron, Qi, Hand tag)	Used by Bea-con Knitwear Ltd.
6 th & 7 th floor	Sewing & finishing section (Iron, Qi, Hand tag)	Used by audited factory

Roof top	100% vacant.	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.
Building-5 (06 storied)	Description	Remark, if any
Ground Floor	Dyeing finishing	Used by Bea-con Knitwear Ltd.
1st Floor	Grey batch store area	NA
2nd Floor	Grey batch store area	NA
3rd Floor	Grey fabric store area	NA
4th floor	Knitting section	Used by Bea-con Knitwear Ltd.
5th floor	Knitting section	NA
Roof top	100% vacant	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.
Building-6 (08 storied)	Description	Remark, if any
Ground Floor	Sample dyeing	Combinedly used with Bea-con Knitwear Ltd.
1st Floor	Batch, sample wash & quality	Combinedly used with Bea-con Knitwear Ltd.
2nd Floor	Grey & batch store	Combinedly used with Bea-con Knitwear Ltd.
3rd Floor	Grey & batch store	Combinedly used with Bea-con Knitwear Ltd.
4th floor	R&D office and store	Combinedly used with Bea-con Knitwear Ltd.
5th floor	Knitting section	NA
6th floor	Knitting section	Used by Bea-con Knitwear Ltd.
7th floor	Narrow fabric & collar (audited facility) & sample jacquard section (Used by Bea-con Knitwear Ltd.)	Combinedly used with Bea-con Knitwear Ltd.
Roof top	100% vacant.	NA

Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.
Building-7 (10 storied)	Description	Remark, if any
Basement	Spare part storage area	Combinedly used with Bea-con Knitwear Ltd.
Ground Floor	Printing finishing (continuous washing, stenter, compacting)	NA
1st Floor	Rotary printing	NA
2nd Floor	All over print	NA
3rd Floor	Printing, printing fabric, printing screen, grey store	NA
4th floor	Chemical store	NA
5th floor	Yarn store	NA
6th floor	Knitting section	NA
7th floor	Yarn store	NA
8th floor	Yarn store, partial leftover store	NA
9th floor	Yarn store	NA
Roof top	100% vacant.	NA
Is this a shared building?	No	NA
Building-8 (05 storied)	Description	Remark, if any
Ground Floor	Admin office, MIS and medical room	Combinedly used with Bea-con Knitwear Ltd.
1st Floor	Training & conference room, childcare	Combinedly used with Bea-con Knitwear Ltd.
2nd Floor	Guest room, civil office, SDC	Combinedly used with Bea-con Knitwear Ltd.
3rd Floor	Temple, dining	Combinedly used with Bea-

		con Knitwear Ltd.
4 th floor	Security dining	Combinedly used with Beacon Knitwear Ltd.
Roof top	100% vacant.	NA
Is this a shared building?	Yes	Shared with Beacon Knitwear Ltd.
Building-9 (07 storied)	Description	Remark, if any
Ground Floor	Workshop/ fabric store/ WTP store	Combinedly used with Beacon Knitwear Ltd.
1st Floor	Yarn store & office	Combinedly used with Beacon Knitwear Ltd.
2 nd Floor	Knitting section	Used by Beacon Knitwear Ltd.
3 rd Floor	Knitting section	Used by Beacon Knitwear Ltd.
4 th floor	Yarn store	Combinedly used with Beacon Knitwear Ltd.
5 th floor	Yarn store	Combinedly used with Beacon Knitwear Ltd.
6 th floor	Gym & guest house	Combinedly used with Beacon Knitwear Ltd.
Roof top	100% vacant	NA
Is this a shared building?	Yes	Shared with Beacon Knitwear Ltd.
Building-10 (08 storied)	Description	Remark, if any
Ground Floor	Dyeing	NA
1st Floor	Dyeing finishing	NA
2 nd Floor	Dyeing finishing	NA
3 rd Floor	Finished goods store, Idle machine area	NA

		con Knitwear Ltd.
1st Floor	ETP area	Combinedly used with Bea-con Knitwear Ltd.
2nd Floor	R&D yarn store	Combinedly used with Bea-con Knitwear Ltd.
3rd Floor	Fabric store	Shared with Bea-con Knitwear Ltd.
Roof top	100% vacant.	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.

For below, please add any extra rows if appropriate

Building-13 (07 storied)	Description	Remark, if any
Ground Floor	Washing section	Combinedly used with Bea-con Knitwear Ltd.
1st Floor	Dryer	Combinedly used with Bea-con Knitwear Ltd.
2nd Floor	Dryer	Combinedly used with Bea-con Knitwear Ltd.
3rd Floor to 6th floor	Under construction	NA
Is this a shared building?	Yes	Shared with Bea-con Knitwear Ltd.

Shed#1: Dyeing Section.
 Shed#2: Chemical store
 Shed#3: Waste keeping area.
 Shed#4: dyeing (used by Shared with Bea-con Knitwear Ltd.)

	<p>Main product of the facility was all kinds of Knit items and production capacity were 910,000 pieces per month for readymade garments, 650,000 pieces per month for washing, 1170 tons for Dyeing, 1248 tons for Knitting and 520 tons for all over printing per month.</p> <p>There are total 4837 employees in the facility with 2903 male and 1934 female employees. Facility's operation has a general shift from 08:00 am to 05:00 pm with one-hour lunch break (01:00 pm to 02:00 pm). Facility has 03 shifts (06:00 am to 02:00 pm, 02:00 pm to 10:00 pm and 10:00 pm to 06:00 am) in all Over Printing and Washing section. Washing section, all over print and batch section run in 02 shifts (8:00 am to 5:00 pm, 8:00 pm to 4:00 am and 8:00 pm to 4:00 am) with one-hour break time in each shift. In general, the employee work for 6 days in a week (Saturday to Thursday) and Friday is weekly holiday. Security sections weekly holiday provided as rotation basis. All employees were recruited permanently and receive wages by monthly basis in local currency within 7th working day of the following month. The factory uses electronic timecard for recording daily attendance.</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: Please give details: This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported because of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details:</p> <p>facility management has taken construction approval from local Chairman "Kutubpur Union Porishad Fatullah, Narayanganj" instead of concern authority for building#1,2,3,4,5,8,9,11,12 to 13 and shed#1 to 4.</p> <p>Floor layout permission was taken from Department of Inspection for factories and establishment on 15/6/2021 (last updated).</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider

	<input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Subcontractor
H: Month(s) of peak season: (if applicable)	Round the year same
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Product: All kinds of Knit Items.</p> <p>Line: 14</p> <p>Process: Knitting>Dyeing and Dyeing finishing>Washing>All Over Printing >Cutting>Sewing>Finishing>Packing.</p> <p>Equipment:, plain machine,overlock machine ,cylinder bed machine,smak cylinder bed machine,flatbed machine,body hem compressor,back tape machine,rib cutter machine,dar tack machine,button hole machine,cutting machine (safq),button stitch machine,cutting machine ,pickoting machine (kansa), fusing machine,two needle machine,zigzag stitch machine,spot cleaner,angular stitch machine,pmd machine,saub button,thread sucker machine,needle detector, washing m/c , spot cleaner,iron table with iron, automatic flatbed all over printing m/c, automatic flat bed screen printing m/c, manual screen print, automatic inject m/c, developer m/c, stretching m/c, manual exposing m/c, rib & inter lock ,single jersey ,dyeing machine ,tubular finishing machine, gas dryer (santex) ,tubular finishing machine,, steam dryer, turning machine, tubular compactor, tubular squeezer, soft calendar machine, dyeing machine ,washing machine ,hydro extractor machine ,tumble dryer machine, lab-dyeing machine, boiler, generator, compressor. wtp, etp.</p> <p>Total machine- 1127 set</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation There are not any site provided worker accommodation.
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers There is not any off site provided worker accommodation buildings.
N: Were all site-provided	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

accommodation buildings included in this audit	N1: If no, please give details No accommodation is provided.
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Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10: 05 A2: Day 1 Time out: 18:30	A3: Day 2 Time in: 9:16 A4: Day 2 Time out: 16:45	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	03 auditors used in 02 days (5.5 man-day covered onsite)		
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 0 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 Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	15 th & 16 th February 2021		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not applicable		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	2903 (including management)	0	0	0	0	0	0	2903 (including management)
Worker numbers – female	1934 (including management)	0	0	0	0	0	0	1934 (including management)
Total	4837 (including management)	0	0	0	0	0	0	4837 (including management)
Number of Workers interviewed – male	45	0	0	0	0	0	0	45
Number of Workers interviewed – female	30	0	0	0	0	0	0	30
Total – interviewed sample size	75	0	0	0	0	0	0	75

A: Nationality of Management	Bangladeshi.	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u>Bangladeshi</u></p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: Facility does not have any peak season.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u>100%</u></p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: <u>0</u>% workers on piece rate</p> <p>D1: <u>0</u>% hourly paid workers</p> <p>D2: <u>100</u>% salaried workers</p> <p>Payment cycle:</p> <p>D3: <u>0</u>% daily paid</p> <p>D4: <u>0</u>% weekly paid</p> <p>D5: <u>100</u>% monthly paid</p> <p>D6: <u>0</u>% other</p> <p>D7: If other, please give details</p>	

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <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>	45 employees (9 groups of 5 employees, no. of male -30 & female- 15)	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 15	D2: Female: 15
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	No issue was identified during worker interview.	
I: What did the workers like the most about working at this site?	On time payment, no discrimination, aware of legal right.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Comfortable	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>		

Total 75 employees including 45 male and 30 female were selected for interview. Among them 30 employees were selected for individual interview and total 45 employees in 9 groups (5 employees in each group) were selected for the group interview. All the interviewees were favourable with the management. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They are able to complain directly to their supervisors or line manager and also felt free to give their general concerns to their Participation Committee representative who would take it to the Participation Committee meeting.

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

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

Participation Committee members were comfortable with management, workplace and interview process. During opening meeting PC member was present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. They replied naturally regarding their responsibilities as Participation Committee member and they also informed that they can easily carryout their daily job without any difficulties. Participation Committee meetings are held on regular basis. Last meeting of participation committee was held on 26th February 2022. They also stated that they could give suggestions on all parts of the site's practices

O: Attitude of managers:

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

Management of the factory was positive and supportive during the whole audit. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) was the key person of the facility. He is responsible for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope, e.g. ETI Base Code, local laws etc. The factory management was found to be cooperative throughout the audit.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility implements and maintains systems for delivering compliance to this Code.
2. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

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

Details:

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

Any other comments: Nil.

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Factory has policy which authorized at the highest-level human rights impacts and issues, and ensure it is communicated to all workers.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Gaur Nitai Datta Job title: AGM (HR, Admin & Compliance)</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: NA.</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All employee information and personnel files are kept locked away in the human resources department and it is only viewed by the HR department.</p>

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

Good examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not applicable

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 2.55%	A2: This year 2022 2.06 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	This year 2022 2.59 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 1.08 %	C2: This year 2022 0.83%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.90%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Factory used prescribed form of Accident register for recording accidents/injuries, noted through documents review. Moreover, correct reflection of injury analysis and root cause for corrective action was found.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 35 1.30%	F2: This year: 2022 Number: 40 0.98%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.2%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2021 0%	H2: This year: 2022 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers
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0B: Management system and Code Implementation (Click here to return to summary of findings)
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>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</p> <p>0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>

Current Systems and Evidence Examined <i>To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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>Current systems:</p> <p>The factory communicates their code of conduct through training program and notice board regularly including company's own COC. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code. Facility communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.</p> <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):</p> <p>Details:</p> <ol style="list-style-type: none"> 1. Document review (Policy record review and training register review). 2. Facility Management Interview. 3. Workers Interview. 4. Plant tour <p>Any other comments: Nil.</p>

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: Site has not been subjected to any fines in the last 12 months.
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: here is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	There is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
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: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse. <ul style="list-style-type: none"> ➤ Last mid-level management training was held on 19th February 2022 with 19 participants. ➤ Last training for workers was held on 1st to 7th March, 2022 with 71 participants.
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: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse and factory preserved training records as evidence. During interview workers were found aware about the policies and procedures.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility has conducted amfori BSCI audit on 23 rd June, 2021.
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: Facility has an independent Human Resources Department and Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for this department.
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: Facility has a senior person and Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is put into action of the Code.

<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Factory has the policy to ensure all worker information confidential though notice board and awareness training.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: There is effective policy and procedures found to ensure confidential information is kept confidential.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No K1: Please give details: Based on the plant tour, document review and management interview it was noted that, Facility conducted the risk assessment periodically, but they didn't identify specific hazard/risk for some area like: During plant tour it was noted that 03 out 03 compressors were without fencing located at 1st floor of building #4. However, facility management ensure back support chair for sewing section's employees and also free from any adjacent from exhaust fans in the facility.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1 Please give details: Based on the plant tour, document review and management interview it was noted that, Facility conducted the risk assessment periodically, but they didn't identify specific hazard/risk for some area like: During plant tour it was noted that 03 out 03 compressors were without fencing located at 1st floor of building #4. However, facility management ensured back support chair for sewing section's employees and also free from any adjacent from exhaust fans in the facility.</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:</p>

	Facility management communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Factory was established in its own land. All required documents were available.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility have system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: NA
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: NA
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: NA

Non-compliance:	
<p>1. Description of non-compliance:</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>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not Applicable</p>

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective evidence observed:</p> <p>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' Auditorsexaminepoliciesandwrittenproceduresin conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

1. Facility does not hold main copy of any legal document of the workers during recruitment. The factory maintains only copies of all hiring documents such application, date of birth certificates, school certificates etc.
2. The workers are free to leave the workplace If workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.
3. Facility displayed overtime policy stating that over time work is voluntary.

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

Details:

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

Any other comments: Nil

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

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

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

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

Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: 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' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

All the employees are allowed to participate and elect the committee members of their choice. There is no trade union in the facility, and it is not mandated by law. There is Participation Committee (PC) as parallel means for trade union. Last election was held on 24th September 2020. Verified and confirmed through records review and interview process that Participation Committee members are not treated less favorably than other employees. Participation Committee members are allowed to carry out their duties within working hours without affecting their pay.

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

Details:

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

Any other comments: Nil

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

	<p>In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and workers representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labor Law 2006)</p>	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has form safety committee. (Workers 6 & management 6) total 12. D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Participation committee (PC) meeting was held on regular basis. Last PC meeting was held on 26th February, 2022. PC meeting minutes recorded, and action taken.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>NA; This is a non-unionized factory.</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Participation Committee (PC) has been formed as a parallel means.</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>All workers were aware about their representatives.</p>
<p>I: Were worker representatives freely elected?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Date of last election: 24th September 2020.</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility workers know, what kind of topic can be raised with their representative.</p>	
<p>K: Were worker representatives/union representatives interviewed?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: 01</p>	
<p>L: Please describe any evidence that union/worker's committee is effective?</p>	<p>Participation Committee regularly conducts meeting. Last meeting was conducted on 26th February 2022 and minutes are given below:</p> <ul style="list-style-type: none"> ● Regarding previous meeting result. 	

Specify date of last meeting; topics covered; how minutes were communicated etc.	<ul style="list-style-type: none"> No to crowd in main gate before lunch time. Workers go to outside without gate pass. Not to take food in the stair. Regarding changing filter of drinking water. <p>Minutes were communicated through notice board.</p>	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: <u> 0 </u> % workers covered by Union CBA	M2: <u> 0 </u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA	

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

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

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

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

Current systems:

Facility has formed safety committee. Total number of the committee member is 12; 6 members are from management and 6 members are from workers.

Factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.

Emergency lights were installed with IPS back up.

Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box 59 & first aider was found 119 persons.

Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 5th to 6th February 2022 with 50 participants.

Facility has total 1203 fire fighters, among them 963 were trained from Bangladesh Civil Defence services. Last firefighting training was provided on 8th March 2022 with 12 participants by fire safety officer.

Facility conducts evacuation drill on monthly basis. Last evacuation drill was conducted on 20th February 2022 with 1837 participants.

PPE training provides regularly. Last PPE training provided on 12th & 13th February 2022 with 52 employees.

First aid training provided regularly to the first aider. Last first aid training was conducted on 15th to 17th February 2022 with 90 participants.

Workers toilet segregate male and female, adequate number as per law, wash facility provided. Total no. of male toilets 70 and female toilets 50.

The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed.

Factory has regular fire equipment maintenance system.

Drinking water facility was available at each floor with easy access.

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

Details:

1. Plant tour.

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

Any other comments: Nil

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: All Policies and procedures are included in workers manual or handbook.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: facility management has taken construction approval from local Chairman "Kutubpur Union Porishad, Fatullah, Narayanganj" instead of concern authority for building#1, 2, 3, 4, 5, 8,9,11,12 to 13 and shed#1 to 4.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are provided personal protective equipment where required.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Medical Facility is available for the workers and it meets the local legal requirements. Male and female rooms in medical are segregated with enough beds.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: 1. Factory has medical facility available with a fulltime Doctor named Dr. Farzana Yasmin, A.K.K.H Samius Sadi; also, Medical assistant- Md. Amir Hossain & Ruma Akter and first aid supplies are easily accessible and available. 2. Total no. of first aid box – 59 & internal first aider was found - 119 persons responsible for first aid.</p>

G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not applicable. Transport facility is not provided to the workers and it is not required 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 type="checkbox"/> No H1: Please give details: Not applicable. Dormitory facility is not provided to the workers and it is not required 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: Please give details: Facility conducted the risk assessment periodically, but they didn't identify specific hazard/risk for some area like: During plant tour it was noted that 03 out of 03 compressors were without fencing located at 1 st floor of building #4. However, facility management ensure back support chair for sewing section's employees and also free from any adjacent from exhaust fans in the facility.
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 has valid "Environmental Clearance Certificate" from concern authority.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility does not use any banned chemical.

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Issue title: Workers were not using sufficient PPE (Personal protective equipment).</p> <p>Description of non-compliance: Based on the plant tour following issues noted below:</p> <ol style="list-style-type: none"> 10% dyeing & washing section operators were not using respiratory mask, hand gloves. Randomly check 03 out of 03 colour mixing employees were not using respiratory mask, hand gloves & eye goggles etc. while working at AOP section. Moreover, 10% AOP section's employees were not using required PPE like respiratory mask, hand gloves & eye goggles etc. 	<p>Objective evidence observed:</p> <p>1. Plant tour (NC picture no- 01 to 13)</p>

- 3. 10% sewing section employees were not using head scarf while working at sewing section.
- 4. 01 out of 02 welding employees were not using hand gloves, mask, and helmet.
- 5. 5% knitting section employees were not using ear plug at knitting section during work.
- 6.15% overlock machine & finishing operators were not using face mask in sewing & finishing section during work located at 4th floor of building 1, 3rd to 4th floor of building 2, 6th to 7th floor of building 4 & 2nd floor of building 3.
- 7. 02 out of 02 snap button machine operators were not using eye goggle in sample section during work located at 2nd floor of building 3.
- 8.10% spot removing, dyeing and chemical store operators were not using respiratory mask, gloves & eye goggles in finishing, dyeing and chemical store located at shed1, 4th floor of building 1 & ground floor of building 3.

Local law and/or ETI requirement:
In accordance with Bangladesh Labour Rules, 2015; Rule 67 (2) and ETI Base Code 3.1.

Bangladesh Labor Rules- 2015, Rule-67(2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

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

Recommended corrective action: It is recommended that factory management should ensure the use of PPE with the awareness program for the workers in the required sections.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

2. Description of non-compliance:

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

Issue title: Insufficient risk assessment.

Description of non-compliance:

2. Plant tour & document review (NC picture no- 14)

Based on the plant tour, document review and management interview it was noted that, Facility conducted the risk assessment periodically, but they didn't identify specific hazard/risk for some area like:

03 out 03 compressors were without fencing located at 1st floor of building #4.

However, facility management ensure back support chair for sewing section's employees and also free from any adjacent from exhaust fans in the facility.

Local law and/or ETI requirement:

In accordance with Bangladesh Labour Rules 2015, Schedule 4(2), B (1) and ETI Base code 3.1

Bangladesh Labour Rules 2015, Schedule 4(2), B (1):

In every (c) Following matters shall be included in the guideline prepared under clause (a),

namely: -

1. Risk and safety related management of the firm:

(a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc.).

(b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc.).

(c) Risk level (like high/medium/general/not satisfactory).

(d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure).

(e) Assessment of necessary protection system in different nature and levels of risk; and

(f) Assessment of technical and administrative liability.

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

Recommended corrective action: It is recommended that the facility management should assess risk assessment properly with identify specific hazard to eliminate the risk.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

3. Description of non-compliance:

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

Issue: Health centre is not found as per law.

Description of non-compliance:

Based on the plant our it was noted that, total 02 factories located in the same factory complex under same management and same owner with total manpower of 6589 workers where 4837 workers in the audited factory and

3. Workers & management interview and plant tour

around 1752 in the other factory (Be-con Knitwear Ltd.). Medical centre is used combine by both factories. As per current manpower of both factories, health centre is required but facility did not have health centre as per law. Moreover, 4 beds found instead of 06 in the medical centre of the facility.

Local law and/or ETI requirement: In accordance with ETI base code 3.1 and with Bangladesh Labour Rules- 2015, Rule-78-a (i) & b

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

Bangladesh Labor Rules- 2015, Rule-78-a (i) & b:

- 1) As per the regulations of Section 89(6), if minimum 5000 workers and employees work in the institute/s that is/are owned by the same Owner:
 - a) The Owner of the institute shall establish a Health Center. Following number of medical staff must be in the Health Center in order to provide treatment facilities to workers/employees:
 - i) At least 2 registered Physicians for 5000 to 7500 workers- employees.
 - b) As per Section 77, there is no need for separate medical room. However, minimum 6 beds must be in each Health Center.

Recommended corrective action: It is recommended that facility management should ensure health Centre as per law.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

4. Description of non-compliance:

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

Issue title: Building approval not taken from concern authority.

Description of non-compliance:

Noted through documents review, plant tour and management interview that facility management has taken construction approval from local Chairman "Kutubpur Union Porishad Fatullah, Narayanganj" instead of concern authority for building#1,2,3,4,5,8,9,11,12 to 13 and shed#1 to 4.

Local law and/or ETI requirement:

In accordance with ETI base code 3.1 and Building Construction Act 1952, Section-3(1).

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

4. Management interview and document review

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

Building Construction Act 1952, Section-3 (1):

There shall not be any construction or extension of any factory unless previous permission in writing is obtained from the Chief Inspector for such construction or extension.

Recommended corrective action: It is recommended that factory should collect approval plan from the concerned authority.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 60 days

5. Description of non-compliance:

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

Issue title: 01 side handrail was missing.

Description of non-compliance:

Based on the plant tour it was noted that, facility management did not ensure wall side hand for 01 out of 01 staircase located at ETP building# 12 from roof top to 2nd floor.

On the other hand, facility management installed both side handrail at 1st floor to ground floor of building# 12.

Local law and/or ETI requirement: In accordance with Bangladesh Labor Rules 2015, Rule-54(5) and ETI base code 3.1

Bangladesh Labor Rules 2015, Rule-54 (5):

If such staircase is made after these rules come into effect, handrails should be attached to both sides.

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

Recommended corrective action: It is recommended that facility should install both side handrail for mention staircases.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

5. Plant tour (NC picture no-15)

6. Description of non-compliance:

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

Issue title: No Generator license found.

Description of non-compliance:

Based on the plant tour, document review and management interview it was noted that, facility is currently using 5 generators (3 gas generators and 02 Diesel generator) having total power generation capacity of 6.96 MW (900 KW + 2000 KW + 2000 KW + 2000 KW + 60 KW).

But facility did not take Captive power plant license for their use of these power generators.

However, facility has applied for obtaining the generator license only for 4.9 MW of power generation instead of 6.96 on 27 May 2021 to the concern authority, but not received the license.

Local law and/or ETI requirement: In accordance with Energy Regulatory Commission Act-2003, Rule-27(a) and ETI base code 3.1

Energy Regulatory Commission Act-2003, Rule-27(a):

No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as: -

(a) power generation

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

Recommended corrective action: It is recommended that factory should collect generator license from concern authority for using power generator.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 60 days

7. Description of non-compliance:

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

Issue title: MSDS, secondary containment and labeling was not ensured for chemical/machine oil.

Description of non-compliance:

Based on the plant tour it was noted that, 03 out of 03 machine oil drum found without secondary containment, labelling and MSDS located at knitting section 6th floor of building#7.

6. Documents review & management interview

7. Plant tour NC picture no-16 to 18)

Moreover, 60 out of 90 chemicals drums and printing colours were kept without MSDS, labelling and secondary containment in chemical store and production floor located at 6th floor of building 1, 1st floor of building 3 & shed 1.

Local law and/or ETI requirement: In accordance with Bangladesh Labour Rules, 2015; Rule 68 (10) and ETI Base Code 3.1:

Bangladesh Labour Rules, 2015; Rule 68 (10):

10) The owner shall place Material Safety Data Sheet (MSDS) of dangerous materials in an easily noticeable place so that the employed worker can be well informed about the possible hazards.

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

Recommended corrective action: It is recommended that factory management should ensure MSDS, secondary containment and labelling for all chemical drums, machine oil, diesel oil etc. where required.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

8. Description of non-compliance:

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

Issue title: Insufficient seating capacity in dining.

Description of non-compliance:

Based on the plant tour, workers, and management interview it was noted that, dining facility found insufficient as presently facility has 650 seating capacity in workers dining instead of 850 (as per shift) as per their present manpower.

Local law and/or ETI requirement: In accordance with Additional Elements 3.1 and Bangladesh Labour Rules-2015, Rule-92(1)

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

Bangladesh Labor Law 2006, Section 92 (1):

a) The Dining Room must accommodate at least 15% of total workers.

Recommended corrective action: It is recommended that facility management should ensure dining facility with sufficient seating capacity in the facility.

8. Plant tour and management & workers interview

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

9. Description of non-compliance:

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

Issue title: Few areas not included and mismatch in Floor layout plan.

Description of non-compliance:

Based on document review and management interview it was noted that, kitchen, compressor was not included in floor layout plan located at 4th floor of building#8 & 1st floor of building#1. Moreover, in addition, mismatch found in 3rd floor of building#5 (3rd floor is approved as knitting section but presently facility is using as grey fabric store). 4th floor of building#6 used as R&D office & store but approved as knitting section. And 6th floor of building#7 used as knitting but approved as store area, roof top & 1st floor building 1 using as printing section & finished goods store instead of open space and dining area and semi-finished goods kept instead of spot removing.

Local law and/or ETI requirement: In accordance with Bangladesh Labour Rules, 2015, Section-353 (1 & 3) and ETI code 3.1

353. Approval of factory's layout plan and extension lay-out plan: (1) Before use, change or expansion of any houses, building or premises as factory, approval in writing of the inspector general or any officer empowered by him shall be taken. Provided, however, that the inspector general or any officer empowered by him shall not sanction any approval without any inspection on the spot.
(3) If the Inspector General is satisfied then he will send back a copy of the submitted layout plan to the applicant as per sub-rule (2) and if he imposes any other conditions, then subject to said condition(s), he will approve the factory's lay-out plan in cases or will expand, change or amend the lay-out plan or will seek other details for approval of the lay-out plan.

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

Recommended corrective action: It is recommended that facility management should collect update floor layout plan from concern authority.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

10. Description of non-compliance:

9. Documents review & management interview

<p><input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Issue title: Evacuation plan was not posted and mismatch</p> <p>Description of non-compliance: During plant tour, noted that evacuation plans of 4th floor of building 1, 1st to 4th floor, roof top of building 2 and 1st floor, of building 4 were mismatch with existing floor layout.</p> <p>for example, open space showing in evacuation plan, which is currently occupied by compressors as like semi-finished goods kept instead of spot removing, dining & colour room instead of open space, empty carton instead of finishing section, fabric stored instead of leftover, finished goods & re carton instead of dining area.</p> <p>Local law and/or ETI requirement: In accordance with Bangladesh labour Rules 2015, Rules 55 (8) and ETI Base code 3.1</p> <p>Bangladesh Labour Rules, 2015, Rule 55 (8): The arrangement should be made to show evacuation plan of exit in one or more places easily visible in each floor of each floor of the factory.</p> <p>ETI Base Code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: It is recommended that facility management should post evacuation plan as per as per floor layout.</p> <p>Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)</p> <p>Timescale: 30 days</p>	<p>10 Plant tour and management interview</p>
<p>11. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Issue title: Machine safety guard found displaced.</p> <p>Description of non-compliance: Based on plant tour following machine safety related issue noted below:</p> <p>a. Approximate 15 % of needle guards of sewing machine were displaced condition at sewing section & sample section in 4th floor of 6th to 7th floor of building 4 & 2nd floor of building 3.</p> <p>b. Approximate 10% eye guards of overlock machines & flatlock machines were displaced condition at sewing section & sample section in 4th floor of 6th to 7th floor of building 4 & 2nd floor of building 3.</p>	<p>11. Plant tour (NC picture no: 19 to 22)</p>

c.02 out 02 rubber mats were missing for snap button machines in sample section during work located at 2nd floor of building 3.

Local law and/or ETI requirement: In accordance with Bangladesh Labour Law 2006, Section 63 (1) D (iii) and ETI base code 3.1

Bangladesh Labour Law 2006, section-63 (1) D (iii):

Unless the following machinery are in such position or of such construction as to be safe to every person employed in the establishment as they would be if they were securely fenced (ii) every part of transmission machinery.

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

Recommended corrective action: It is recommended that the facility management should provide effective training to the employees on proper use of machine safety guard.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 30 days

12. Description of non-compliance:

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

Issue title: Aisles & workers were partially obstructed.

Description of non-compliance:

Randomly checked 15 out of 25 aisles were partially obstructed by raw materials, stand workers and semi-finished goods, box, trolley, fabric sacks, working table, carton at sewing, finishing & dyeing section in in ground floor of building 1, 3rd to 4th floor of building 2, 6th to 7th floor of building 4 & shed 1.

In addition, 06 out of 10 finishing section workers were partially blocked by co-worker, pillar & iron steam pipe at 4th floor of building 1.

Local law and/or ETI requirement: In accordance Bangladesh Labour Law 2006, Section 62 (6) & Bangladesh Labour Law 2006, Section 72 (c), amendment by of the Bangladesh Labour (Amendment) Act, 2013 and ETI Base code 3.1.

Bangladesh Labour Law 2006, Section 62 (6):

(6) A free passageway giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the establishment.

12. Plant tour (NC picture no: 23 to 26)

Bangladesh Labor Law 2006, Section 72 (c), amendment by section 24 (a) of the Bangladesh Labour (Amendment) Act, 2013: passages and stairways shall be clean, wide and clear of all obstructions

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

Recommended corrective action: It is recommended that factory management should keep all the aisles and passage obstacle free for emergency situation and provide enough working space for the worker to prevent congestion.

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Timescale: 60 days

13. Description of non-compliance:

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

Issue title: Boiler certificate expired.

Description of non-compliance:

01 out of 04 certificate of boiler operation has been expired from 3rd March 2022 noted through document review.

However, facility has applied for renewal on 7th February 2022 to get Boiler Certificate.

Local law and/or ETI requirement: In accordance with Boiler Act 1923, Section-8(1, a) & ETI base code 3.1

Boiler Act 1923, Section-8 (1, a):

Certificate authorizing the use of a boiler shall cease to be in force- (a) on the expiry of the period for which it was granted.

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

Recommended corrective action: It is recommended that the factory management should obtain the updated certificate of boiler operation

Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

13. Document review and management interview

<p>Timescale: 60 days</p> <p>14. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Issue title: Night fire drill was not held in a regular basis.</p> <p>Description of non-compliance: Facility has conducted fire drill, but night fire drill was not conducted in a regular basis as last night fire drill was conducted on 1/10/2020. After that, no night fire drill was conducted. Note that, day fire drill was conducted in a regular basis.</p> <p>Local law and/or ETI requirement: In accordance with Bangladesh Labour Rules, 2015, Rule: 55 (14) and ETI Base Code 3.1</p> <p>Bangladesh Labour Rules, 2015, Rule: 55 (14): As per Section 62(8), fire drills and emergency evacuation drills have to be arranged at least once in every six month period and the same has to be preserved in respective record books, in accordance with Form- 22. In addition, the concerned Inspector and nearby Fire Service Station have to be informed minimum 15 days before the drills are held.</p> <p>ETI Base Code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: It is recommended that factory management should conduct regular night fire drill in the facility</p> <p>Action taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)</p> <p>Timescale: 30 days</p>	<p>14. Document review, workers & management interview</p>
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Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good Examples observed:

Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable
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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' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

Facility established a policy which discourages the employment of child labour and no child labour found in the factory during the audit. Factory has strong recruitment process to verify the worker's age. 75 sampled workers' personal files were provided for review. In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age.

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

Details:

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

Any other comments: Nil.

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

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

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: 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' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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:

The facility is providing local legal minimum wage BDT 8000/month for all the employees.

Time keeping system is electronic (punch card).

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

Each employee was given a pay slip and signed for their wages.

Employees are aware of their minimum wage.

Wages have been recorded according to documents checked.

There is good practice by the facility; see below GE section.

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

Details:

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

2. Worker interview

3. Management interview

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

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

None Observed

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <ol style="list-style-type: none"> 1. Facility provides attendance bonus BDT 400 for all workers as per company policy. 2. Facility provides education scholarship for the workers children. 3. Facility arranges annual picnic. 	<p>Objective Evidence Observed:</p> <p>Management, workers interview and document review, and salary sheet review.</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day and 48 hours per week.	A1: 8 hours/ day 48 hours/ week	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided	B1: Maximum 02 hours/ day and 12 hours per week in February 2022 (current month), September 2021 (random month) and March 2021	B2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA

	<p>that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56 (fifty-six) hours per week in any year.</p> <p>Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent.</p> <p><u>Exception for 06 months:</u> This exemption has been extended several times in last few years and latest extension was on October 14, 2021 and it will be in effect from October 16, 2021 to April 17, 2022.</p>	(random month)	
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<p>C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: (As per Garments Gadget 2019). BDT. 8000 per month (Basic BDT 4100, House rent 50% of the Basic which is BDT.2050, Medical allowance BDT. 600, Conveyance allowance. BDT.350, Food Allowance BDT.900.) For Grade 7 (Assistant operator).</p>	<p>C1: BDT 8000 / month</p>	<p>C2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>
<p>D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: 200% of the basic wage rate per hour.</p>	<p>D1: 200% of the basic wage rate per hour.</p>	<p>D2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>

<p style="text-align: center;">Wages analysis: (Click here to return to Key Information)</p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If No, why not?</p>	<p>NA</p>
<p>B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i></p>	<p>75 attendance records and payroll records from February 2022 (Current month). 75 attendance records and payroll records from September 2021 (random month). 75 attendance records and payroll records from March 2021 (random month).</p>

<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If Yes, please give details: The Government has announced the new pay structure which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on 25th November 2018 and amendment was done on 24 January 2019. There are two separate pay structures: for the garment workers (Schedule A), For the staff (Schedule B). Schedule A is as follows:</p> <table border="1" data-bbox="587 515 1476 1075"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk.10938</td> <td>Tk.5469</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 18257</td> </tr> <tr> <td>Grade 2</td> <td>Tk. 9044</td> <td>Tk. 4522</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 15416</td> </tr> <tr> <td>Grade 3</td> <td>Tk. 5330</td> <td>Tk. 2665</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9845</td> </tr> <tr> <td>Grade 4</td> <td>Tk. 4998</td> <td>Tk. 2499</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9347</td> </tr> <tr> <td>Grade 5</td> <td>Tk. 4683</td> <td>Tk. 2342</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8875</td> </tr> <tr> <td>Grade 6</td> <td>Tk. 4380</td> <td>Tk. 2190</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8420</td> </tr> <tr> <td>Grade 7</td> <td>Tk. 4100</td> <td>Tk. 2050</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8000</td> </tr> <tr> <td>Apprentice</td> <td>Tk. 2750</td> <td>Tk. 1375</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 5975</td> </tr> </tbody> </table>	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk.10938	Tk.5469	Tk.600	Tk.350	Tk.900	Tk. 18257	Grade 2	Tk. 9044	Tk. 4522	Tk.600	Tk.350	Tk.900	Tk. 15416	Grade 3	Tk. 5330	Tk. 2665	Tk.600	Tk.350	Tk.900	Tk. 9845	Grade 4	Tk. 4998	Tk. 2499	Tk.600	Tk.350	Tk.900	Tk. 9347	Grade 5	Tk. 4683	Tk. 2342	Tk.600	Tk.350	Tk.900	Tk. 8875	Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk. 8420	Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk. 8000	Apprentice	Tk. 2750	Tk. 1375	Tk.600	Tk.350	Tk.900	Tk. 5975
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<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If No, please give details:</p>																																																															
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BDT 8000 / month.</p>																																																															
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage F2: _6___% of workforce earning minimum wage F3: _94___% of workforce earning above minimum wage</p>																																																																
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc.</i></p> <p>➤ Facility provides attendance bonus BDT. 400 to all workers for full presence in a month.</p>																																																																

<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc..</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>a. Unauthorised absence Please describe: Facility deduct only Unauthorised absence and revenue stamp.</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>a. Fines, b. Housing facility, c. Advance payments, d. Loans, e. Income tax, f. Provident fund Please describe: Facility does not deduct the above mention factors.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:</p>	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Workers' time record was consistent with provided documents.		
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as Minimum Wages Gazette for Readymade Garments Sector published on 24 th January 2019".		
<p>M2: If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions		

	<input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: NA
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: Facility management is annually reviewed the wages as per local law. Facility increase minimum 5% on basic wages as increment for workers of all grades annually.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All workers are paid within 7 th working days of the completion of month.
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: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer (100%) <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

Current systems:

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

1. Standard working hours found 48 hours in the facility.
2. Through employees' interview it was noted that they were aware about voluntary overtime policy.
3. As per the company policy all overtime will be compensated at a premium rate (200% of basic wage).
4. Casual leave, sick leave, festival leave was provided as per local law.
5. Mr. Gaur Nitai Datta, AGM (Admin, HR and Compliance) is responsible for Human Resource Management (Daily attendance, manpower reports, absenteeism, salary administration, leave, promotion etc.).

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

Details:

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

Any other comments: Nil.

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements NC against Local Law

NC against customer code:

None observed

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE): None Observed

None observed

Objective Evidence Observed:

Not Applicable

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

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: NA
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 46 Hours in the month of February 2022 (Current Month) 52 Hours in the Month of September 2021 (Random Month) 52 Hours in the Month of March 2021 (Random Month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	22.5%	
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: It was noted from appointment letter, handbook review and interview with the workers that overtime is voluntary.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: Facility has a policy to pay 200% of basic per hour for overtime work.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Workers who work overtime get premium rate per month.

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

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

Current systems:

There is 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.

No gender discrimination was found in the facility; both female and male employees were distributed in all types of work.

The facility provides the same wage amount to male/female employees of the same rank.

No complaint or records found for pregnancy test.

There is no restriction for formation of trade union in the facility.

Mr. Gaur Nitai Datta -AGM (Admin & Compliance is responsible for ensuring compliance with this code.

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

Details:

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

Any other comments: Nil.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:99 % A2: Female 01 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Nil

<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: Nil</p>
---	---

Professional Development

<p>A: What type of training and development are available for workers?</p>	<p>Workers receive regular and recorded health & safety training.</p> <p>Last Health & Safety training was provided on 5th & 6th February 2022 with 50 participants.</p> <p>Last firefighting training provided on 8th March 2022 with 12 participants.</p> <p>Last PPE training provided on 12th & 13th February 2022 with 52 employees.</p> <p>Last first aid training was conducted on 15th to 17th February 2022 with 90 participants.</p>
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<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If no, please give details:</p>
---	--

Non-compliance:	
<p>1. Description of non-compliance:</p> <p> <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>Local law and/or ETI requirement: Not Applicable.</p> <p>Recommended corrective action: Not Applicable.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Not Applicable.</p>

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

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

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

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

Details:

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

Any other comments: Nil.

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

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed:</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 & 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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

purpose of recruitment/placement?	B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:NA
D: If any checked, give details:	Nil

Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>		
A: Type of work undertaken by migrant workers:	No migrant workers employed by the factory.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used: No migrant workers employed by the factory.	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA. No migrant workers employed by the factory. <table border="1" data-bbox="933 1648 1505 1904" style="float: right; margin-left: 20px;"> <tr> <td data-bbox="933 1648 1505 1904">C2: Observations:</td> </tr> </table>	C2: Observations:
C2: Observations:		

<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: No migrant workers employed by the factory.</p>
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NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
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
C: If any checked, give details:	B1 – If other, please give details: NA

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Nil
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: NA
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: NA

Contractors:	
<i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	NA
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA
D: If Yes , please give evidence for contractor workers being paid per law:	NA

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

Current systems:

There is 01 subcontract process found in the factory, noted through document review, factory tour, management and employee interview. Facility does subcontract for embroidery.

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	Embroidery	Nil
Name of factory	Mercer Knitting & Design Mills Ltd	Void
Address	Charabagh, Ashulia, Savar, Dhaka	Void

Details:

1. Document review.
2. Management interview
3. Facility tour.
4. Worker interview.

Non-compliance:	
<p>1. Description of non-compliance:</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>Local law and/or ETI /Additional Elements requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

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

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

Summary of sub-contracting – if applicable	
<input type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please describe: No unrecorded work was identified.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: If Yes, summarise details: The subcontracting facility is authorised by client.</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>01 subcontractor is used for one process (Embroidery).</p>
<p>D: Is there a site policy on sub-contracting?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If Yes, summarise details: Facility has a detail subcontracting policy.</p>

E: What checks are in place to ensure no child labour is being used and work is safe?	Internal audit.
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Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details: NA		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents NA		C1: If through agents, number of agents:
			NA
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	NA		
F: What processes are carried out by homeworkers?	NA		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:NA		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Factory has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Factory has fixed some complaint boxes in workers' toilet area. No complaint records found regarding physical abuse or harassment.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other <p>D1: Please give details: Facility has grievance mechanism for the workers, communities and supplies.</p>
<p>E: Are there any open disputes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>F1: If no, please give details:</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>H1: If no, please give details</p>

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>II: If yes, please give details</p>	

Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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:

The facility has established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Through the facility management and employee interview, it was noted that no physical or verbal abuse happened in the facility.

There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the employee in question.

Mr. Gaur Nitai Datta-AGM (Admin & Compliance) is responsible for ensuring compliance with this code and human rights.

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

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

Any other comments: Nil.

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

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: 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' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

It was noted through documents review and workers interview that there are no agency staffs, employment agencies and immigration workers in the factory. Mr. Gaur Nitai Datta-AGM (Admin & Compliance is responsible for ensuring compliance with this code.

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

Details:

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

Any other comments: Nil.

Non-compliance:

1. Description of non-compliance:

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

None observed.

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

Recommended corrective action: Not Applicable.

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable.

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

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

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility has an environmental policy which covers all the System and comply the legal requirement.
2. Factory surrounding environment found acceptable.
3. Factory has waste management policy regarding solid as well as hard waste.
4. Md. Nur Bahadur, Sr. Manager-ECR is Environmental responsible person of the facility.
5. Environmental Impact Assessment conducted by Qtex Solutions Ltd on June 2018.

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

Details:

1. Document review
2. Factory tour

- 3. Management interview
- 4. Environmental Clearance certificate review
- 5. Air emission & noise level test review

Any other comments: Nil.

Non-compliance:

1. Description of non-compliance:

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

Issue title: Improper waste management.

Description of non-compliance:

Based on the plant tour it was noted that, wastage (such a used plastic, leftover materials, construction material etc.) stacked up in the open area without proper segregation & weather protection of ground floor of facility premises.

Local law and/or ETI/Additional Elements requirement:

In accordance with Additional Elements 10B4.1 and Bangladesh Labour Law 2006, section 54

Environment 4-Pillar, 10B4.1: Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

Bangladesh Bangladesh Labour Law 2006, section 54: Effective arrangements shall be made in every establishment for disposal of wastes and effluents due to the manufacturing process carried on therein.

Recommended corrective action: It is recommended that facility management should keep the wastes in designated place with proper segregation and weather protection.

Action Taken by: Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance)

Time scale: 30 days

Objective evidence observed:

(where relevant please add photo numbers)

- 1. Plant tour (NC picture no-27)

Observation:

Description of observation: None observed

Local law or ETI/Additional elements requirements: 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

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Md. Nur Bahadur, Sr. Manager-ECR is responsible person to look after environmental issues of the facility.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility has conducted risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No environmental system certification is available in the facility.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Facility has a publicly available environmental policy relevant with production process and surrounding environment.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility management identified key impacts by their operation through EIA on June 2018 and facility management provided environment training to the employee on 26 th February 2022 & participation was 22 employees.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Facility has no other sustainability systems in place.
H: Have all legally required permits been shown? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Environmental clearance certificate (ECC) of the facility expired on 3 rd May 2020 and applied for renewal on 30 th June 2020.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Facility has chemical inventory and has record of hazardous chemicals used in the facility.

J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: This is included in their management system.	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: Please give details: Facility does not recycle wastage. Facility waste is disposed by licensed vendor.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has measuring system regarding consumption of electricity, water and natural resources.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has system to monitor sub-contract facility and they keep the sub-contract factory's legal license or permits. Also, facility conducts internal audit in the sub-contracting business partner facilities.	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: 2020	Current Year: Please state period: 2021
Electricity Usage: <i>Kw/hrs</i>	3312102 kw/hrs	3190562 kw/hrs
Renewable Energy Usage: <i>Kw/hrs</i>	None	None
Gas Usage: <i>Kw/hrs</i>	20707380 m3	22468733 m3
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	None	None

Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	Ground Water	Ground Water
Water Volume Used: <i>(m³)</i>	1832495 m3	2357265 m3
Water Discharged: <i>Please list all receiving waters/recipients.</i>	Drainage system	Drainage system
Water Volume Discharged: <i>(m³)</i>	1025510 m3	1319711 m3
Water Volume Recycled: <i>(m³)</i>	No water recycled	No water recycled
Total waste Produced <i>(please state units)</i>	2489399 kg	3369543 kg
Total hazardous waste Produced: <i>(please state units)</i>	229241 kg	258743 kg
Waste to Recycling: <i>(please state units)</i>	None	None
Waste to Landfill: <i>(please state units)</i>	None	None
Waste to other: <i>(please give details and state units)</i>	Facility total waste is disposed by licensed vendor named "Azmot Traders".	Facility total wastage is disposed by licensed vendor named "Azmot Traders".
Total Product Produced <i>(please state units)</i>	15155841 kg	18257479 kg

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

10C. Guidance for Observations

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

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

Current Systems and Evidence Examined

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresin conjunction withrelevantmanagers, 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:

The factory management has business policy, anti-corruption and anti-bribery policy. Facility has access to a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter. Facility has a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice. Mr. Gaur Nitai Datta, AGM- (Admin, HR and Compliance) is responsible for look after Business Ethics Section.

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

- Details:
- 1. Document review
 - 2. Management interview

3. Site tour

Any other comments: Nil

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

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers A1: Please give details: Facility has their own business ethics policy which they communicated and applied internally, externally with their total supply chain.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility has provided training on business ethics to the relevant personnel and last training was held on 11 th January 2022 with participation of 13 relevant employees.

<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details: Facility updates their policy as per the requirement.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details:</p> <p>Facility communicated their business ethics policy and procedure to their third parties as well their suppliers and monitors both the party's training record during conduction of internal audit.</p>

Other findings

Other Findings Outside the Scope of the Code

None observed

Community Benefits

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

None observed

Photo Form

Non-Conformity Pictures:



NC Picture 01: Dyeing section operators were not using respiratory mask, hand gloves



NC Picture 02: Washing section operators were not using respiratory mask, hand gloves



NC Picture 03: Colour mixing employees were not using respiratory mask, hand gloves & eye goggles while working.



NC Picture 04: All over print section's employees were not using respiratory mask, hand gloves & eye goggles.



NC Picture 05: Sewing section employees were not using head scarf while working at sewing section.



NC Picture 06: welding employees were not using hand gloves, mask, and helmet.



<p>NC picture no 07: Knitting section employees were not using ear plug at knitting section during work.</p>	<p>NC Picture 08: Overlock machine operators were not using face mask in sewing section during work</p>	<p>NC Picture 09: Finishing section operators were not using face mask in finishing section during work</p>
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<p>NC Picture 10: Snap button machine operators were not using eye goggle</p>	<p>NC Picture 11: Spot removing operators were not using respiratory mask, gloves & eye goggles in finishing section.</p>	<p>NC Picture 12: Dyeing section operators were not using respiratory mask, gloves & eye goggles in dyeing section.</p>
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<p>NC Picture 13: Chemical store operators were not using respiratory mask, gloves & eye goggles in chemical store</p>	<p>NC Picture 14: 03 out 03 compressors were without fencing located at 1st floor of building #4.</p>	<p>NC Picture 15: One side handrail was missing.</p>
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<p>NC Picture 16: Machine oil drum found without secondary</p>	<p>NC Picture 17: Chemicals drums were kept without MSDS, labelling</p>	<p>NC Picture 18: Printing colours were kept without MSDS, labelling</p>
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<p>containment, labelling and MSDS located at knitting section</p>	<p>and secondary containment in chemical store</p>	<p>and secondary containment in production floor</p>
		
<p>NC Picture 19: Needle guards of sewing machine were displaced condition at sewing section</p>	<p>NC Picture 20: Eye guards of overlock machines were displaced condition at sewing section</p>	<p>NC Picture 21: Eye guards of flatlock machines were displaced condition at sewing section</p>
		
<p>NC Picture 22: Rubber mats were missing for snap button machines in sample section during work</p>	<p>NC Picture 23: Aisles were partially obstructed by raw materials, and semi-finished goods, fabric sacks, carton at sewing section</p>	<p>NC Picture 24: Aisles were partially obstructed by raw materials, stand workers and semi-finished goods, box, fabric sacks, carton at finishing section</p>
		
<p>NC Picture 25: Aisles were partially obstructed by raw materials, trolley, fabric sacks at dyeing section</p>	<p>NC Picture 26: Finishing section workers were partially blocked by co-worker, pillar & iron steam pipe</p>	<p>NC Picture 27: Facility's wastage (such a used plastic, leftover materials, construction material etc.) stacked up in the open area without proper segregation & weather protection</p>

Good Example Pictures:

	<p>Void</p>	<p>void</p>
<p>Facility arranges annual picnic.</p>	<p>Nil</p>	<p>Nil</p>

General Photo:

<p>Factory nameplate</p>	<p>Factory gate</p>	<p>Factory building view</p>

<p>Security post</p>	<p>Roof Top</p>	<p>Electronic time keeping machine</p>

<p>Knitting Section</p>	<p>Dyeing Section</p>	<p>Dyeing Finishing Section</p>

<p>Washing Section</p>	<p>All Over Printing</p>	<p>Cutting Section</p>

<p>Sewing Section</p>	<p>Pressing Section</p>	<p>Folding section</p>

<p>Quality check Section</p>	<p>Needle detection area</p>	<p>Packing Section</p>

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<p>Yarn storage area.</p>	<p>Finished goods area</p>	<p>Grey fabric Store</p>
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<p>Chemical Storage area</p>	<p>Spot Removing area</p>	<p>Eye wash station</p>
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<p>Emergency Light</p>	<p>Fire alarm switch</p>	<p>Fire alarm bell</p>

		
<p>Smoke detector</p>	<p>Illuminated exit light</p>	<p>Fire extinguisher</p>

		
<p>Addressable fire control panel</p>	<p>Fire hose demonstration</p>	<p>Fire hose cabinet</p>

<p>Fire door</p>	<p>Public Addressing System (PA)</p>	<p>Staircase</p>

<p>Sprinkler</p>	<p>No smoking sign</p>	<p>Electrical panel board</p>

<p>Fire fighting equipment</p>	<p>ETI Base Code posted</p>	<p>Exhaust fan</p>

<p>Drinking water point</p>	<p>Evacuation plan posted</p>	<p>First aid box</p>

<p>Medical room</p>	<p>Patient bed</p>	<p>Childcare room</p>

<p>Canteen</p>	<p>Workers dining</p>	<p>Workers toilet</p>

<p>Complaint box</p>	<p>Generator</p>	<p>Boiler</p>

		<p>Void</p>
<p>Effluent Treatment Plant</p>	<p>Compressor</p>	<p>Nil</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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