



# Sedex Members Ethical Trade Audit Report

Version 6.0



Sedex Company Reference: (only available on Sedex System)	ZC: 1055803		
Sedex Site Reference: (only available on Sedex System)	ZS: 1002964		
Business name (Company name):	Flex Foods Limited		
Site name:	Flex Foods Limited		
Site country:	<input type="checkbox"/> 2-Pillar	<input checked="" type="checkbox"/> 4-Pillar	
Site address: (Please include full address)	Lal Tappar, Haridwar Road , Dehradun ( UK ) India -248140		
Site contact and job title	Mr. Samir Gupta DGM-( QA & Technical )		
Site phone:	+91 135 2499234, 2499262		
Site e-mail:	sgupta@flexfoodsltd.com		
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input checked="" type="checkbox"/> Environment <input checked="" type="checkbox"/> Business Ethics
Date of Audit	13-11-2017 to 14-11-2017 ( 2.5 Man days with extended hours ) + 0.5 MAN day for Report writing		

<b>Audit Company Name &amp; Logo:</b> 	<b>Report Owner (payee):</b> Flex Foods Limited
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Audit Conducted By					
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
NGO	<input type="checkbox"/>	Retailer	<input type="checkbox"/>	Brand Owner	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

## 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 6.0 April 2017 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
  - Management systems and code implementation,
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

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

Lead auditor: : G.V RAYUDU

Team auditor: Sole Auditor

Interviewers: G.V RAYUDU

Report writer G.V RAYUDU

Report reviewer B. Sathiyarayanan

Date of declaration: 11-12-2017

*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.*

## Non-Compliance Table

<b>Issue</b> <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <b>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</b>		<b>Area of Non-Conformity</b> <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				<b>Record the number of issues by line*:</b>			<b>Summary of Findings</b> <i>(note to auditor, summarise in as few words as possible, all findings, NC, Obs &amp; GE's.)</i>
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Human Rights			<input type="checkbox"/>	<input type="checkbox"/>				•
0B	<u>Management systems and code implementation</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
2	<u>Freedom of Association</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
3	<u>Safety and Hygienic Conditions</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0			



10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0			

*\*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:	Flex Foods Limited																
B: Site name:	Flex Foods Limited																
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	<ul style="list-style-type: none"> <li>Factory Licence--Registration No.DDN 315--- , valid till---31-12-2017-,sanctioned strength for Employment of workers.250,,,Sanctioned Electricity load- 5000 HP .</li> </ul>																
D: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Manufacture of Freezed ,Dried / IQF ( Frozen ) /air Dried - Mushrooms, vegetables ,Fruits ,Herbs ,and spices . .																
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<ul style="list-style-type: none"> <li>Factory Licence--Registration No.---1286, GOA/ 1387- , valid till---31-12-2017-,sanctioned strength for Employment of workers.250,,,Sanctioned Electricity load- 2000 HP .</li> <li>Site Plan approval : no Doon valley special area dev</li> </ul> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Only Ground</td> <td>Made of cement and concreat covered by plastic sheet</td> </tr> <tr> <td>Floor 2</td> <td></td> <td></td> </tr> <tr> <td>Floor 3</td> <td></td> <td></td> </tr> <tr> <td>Is this a shared building?</td> <td>NO</td> <td></td> </tr> </tbody> </table> <p>Authority vide 1746/88/F/V.P/2014-15 Dated 18-06-2015 Total Area – 26220 SQ.Mtrs Covered Area –11109.5Sq. Mtrs .</p> <ul style="list-style-type: none"> <li>Approval of Factory Plant and Machinery layout Plan under The Factory Act ,1948 by Chief Inspector of Factories and Boilers no . 13/2016</li> <li>Building Stability certificate : No of Buildings -3. Main Building ,( Ground + 1<sup>st</sup> Floor t 2<sup>nd</sup> Building ( Ground + 1<sup>st</sup> Floor 3<sup>rd</sup> Building cold storage Building with 4 floors by Mr . V.C.GARG Chief inspection Engineer dated Competent Engineer Member ship no M-138342-0 dated 23/08/2013</li> <li>Fire NOC - No. 20/ fire safety ( 677/17-18 Dated 07-11-17 Valid till 06-11-2018 .by Chie05-11-2016Fire Safety officer</li> </ul>		Production Building no	Description	Remark, if any	Floor 1	Only Ground	Made of cement and concreat covered by plastic sheet	Floor 2			Floor 3			Is this a shared building?	NO	
Production Building no	Description	Remark, if any															
Floor 1	Only Ground	Made of cement and concreat covered by plastic sheet															
Floor 2																	
Floor 3																	
Is this a shared building?	NO																

	<p>under Fire Force Act 1986.</p> <p>For below, please add any extra rows if appropriate.</p> <p>Visible structural integrity issues (large cracks) observed and without structural engineer evaluation</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Details:</p>
F: Site function:	<p><input type="checkbox"/> Agent</p> <p><input checked="" type="checkbox"/> Factory Processing/Manufacturer</p> <p><input type="checkbox"/> Finished Product Supplier</p> <p><input type="checkbox"/> Grower</p> <p><input type="checkbox"/> Homeworker</p> <p><input type="checkbox"/> Labour Provider</p> <p><input type="checkbox"/> Pack House</p> <p><input type="checkbox"/> Primary Producer</p> <p><input checked="" type="checkbox"/> Service Provider</p> <p><input type="checkbox"/> Sub-Contractor</p>
G: Month(s) of peak season: (if applicable)	March to June
H: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	. RM Receiving -washing-sorting-sizing -Freezing-FreezDrying-Sorting-Magnets -Metal Seperation -Packing -Storag and Despatch
I: What form of worker representation / union is there on site?	<p><input type="checkbox"/> Union (name)</p> <p><input checked="" type="checkbox"/> Worker Committee</p> <p><input type="checkbox"/> Other (specify)</p> <p><input type="checkbox"/> None</p>
J: Is there any night production work at the site?	<p><input type="checkbox"/> Yes NA</p> <p><input checked="" type="checkbox"/> No</p>
K: Are there any on site provided worker accommodation buildings e.g. dormitories	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If yes approx. % of workers in on site accommodation</p>
L: Are there any off site provided worker accommodation buildings	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If Yes approx. % of workers</p>
M: Were the site provided accommodation buildings included in this audit	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If No, please give details</p>



Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 21:00	Day 2 Time in: 09:00 Day 2 Time out: 17:00	
B: Number of Auditor Days Used:	2.5 Man days with extended hours ( on-site )+ Half day for report writing		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:      weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Samir Gupta		
H: Is further information available(if Y please contact audit company for details )	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	16 <sup>th</sup> to 18 <sup>th</sup> November ,2013, by SGS		
J: Previous audit type:	SMETA – 4 Pillar Audit Full Initial		
K: Was any previous audit reviewed during this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	NA
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No UNION

## 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 and where they do not intend to remain permanently 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	53	0	67	0	0	0	0	120
Worker numbers – female	5	0	3	0	0	0	00	8
Total	58	0	70	0	0	0	0	128
Number of Workers interviewed – male	10	0	15	0	0	0	0	25
Number of Workers interviewed – female	5	0	0	0	0	0	0	5
Total – interviewed sample size	15	0	15	0	0	0	0	30

A: Nationality of Management	Indian
B: Majority nationality of workers	Main countries: INDIA only Country 1: _____ approx % total workforce _____ Country 2: _____ approx % total workforce _____ Country 3: _____ approx % total workforce _____
C: Worker remuneration (management information)	_____% workers on piece rate _____% hourly paid workers 100_____% salaried workers  Payment cycle: _____% daily paid _____% weekly paid ____100_____% monthly paid _____% other – please give details

### Worker Interview Summary

A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes NA <input type="checkbox"/> No NA	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NA	
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>	4X5 WORKERS + 10 Individual	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 5	Female: 5
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 N, 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?	Nil	
I: What did the workers like the most about working at this site?	Good environment and good remuneration	
J: Any additional comment(s) regarding interviews:	NA	
K: Attitude of workers to hours worked:	good	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If Yes, please give details:</i>		
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>		
Coordial		
N: Attitude of worker's committee/union reps: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information</i>		

should be included) Note: Do not document any information that could put workers at risk

coordial

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

Cooperative and supplied the information and records

# Audit Results by Clause

## 0A: Human Rights

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

### 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 human rights responsibilities.

### Current Systems and Evidence Examined

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

#### Current systems:

All the policies were displayed on notice board . All the policies were available in workers information Manual

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

All the policies were displayed on notice board . All the policies were available in workers information Manual

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr Sunil Kamrani Job title AGM -QA



C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Findings-NIL		
<b>Finding: Observation</b> <input type="checkbox"/>	<b>Company NC</b> <input type="checkbox"/>	<b>Objective evidence observed:</b>
No Non conformity observed		Interview with anagers
<b>Local law or ETI/Additional elements / customer specific requirement:</b>		
<b>Comments:</b>		

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

## 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)	Last year: ___8___ %	This year ___8___ %
B: % Quarterly (90 days) turnover # terminations from the first of the 90 day period through to the last day of the 90 day period / [(#	NIL	

employees on the 1 <sup>st</sup> of day of 90 day period + # employees on the last day of the 90 day period) / 2]		
C: % absenteeism # of days lost through job absence in the month / [(# employees on 1 <sup>st</sup> of the month + # employees on the last day of the month / 2] * # available workdays in the month	Last year: __25__ %	This year __26__ %
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe:	
F: # work related accidents and injuries per 100 workers [# work related accidents and injuries * 100) / # total workers]	Last year:2016 Number: NIL	This year:2017 Number:NIL
G: Lost day work cases per 100 workers [(# lost days due to work accidents and work related injuries * 100) / # total workers]	This year:NIL	Last year: NIL
H: % workers that work on average more than 48 hours / week in the last 6 / 12 months	6 months __0__% workers	12 months __0__% workers
I: % workers that work on average more than 60 hours / week in the last 6 / 12 months	6 months __0__% workers	12 months __0__% workers
J: % Workers report that they know what paid leave is due to them (I.e. is it communicated and understood)	__100__% workers	
K: % complaints resolved / grievances responded to.	__0__% complaints / grievances responded to	__0__% complaints / grievances resolved

### 0B: Management system and Code Implementation

[\(click here to return to NC Table\)](#)

- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

### Current Systems and Evidence Examined

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

#### Current systems:

1. Site visit
2. ETI base code communication
3. Appointment orders

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

Details: 1. Trainings on ETI base code has been conducted. I.

Any other comments:

### 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 Please describe:
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 Please describe:
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	No child Labor
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 Please describe:
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 Please describe:
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe:

G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe:
H: Is there a senior person /manager responsible for implementation of the Code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe:
I: Is there a policy to ensure all worker information is confidential	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe:
J: Is there an effective procedure to ensure confidential information is kept confidential	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe:
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details:
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: NA as the facility is a contractor
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 type="checkbox"/> Yes <input type="checkbox"/> No Details:NA
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: <b>Not Applicable</b>
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: <b>NOT Applicable</b>
R: Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or	<input type="checkbox"/> Yes <input type="checkbox"/> No Details:

minimize adverse impacts Please give details.	
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: NA

### Non-compliance: 0

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

- ☒ NC against ETI/Additional Elements  
☐ NC against customer code:

☐ NC against Local Law

No-non conformance Observed

Local law and/or ETI requirement: : na

Recommended corrective action:

NA

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

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

☐ NC against Local Law

Local law and/or ETI requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

By Verification of records

### Observation:nil

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

### Good Examples observed:nil

Description of Good Example (GE):

Objective evidence observed:

## 1: Freely Chosen Employment

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

### ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

### Current Systems and Evidence Examined

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

#### Current systems:

1. Personal Files of employees
2. Wage records of employees

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

1. Details: The facility does not hold any identification papers.
2. The facility does not limit the employees' freedom. Employees are free to leave the work place and manage their own time while not on duty. If employees are choosing to quit their job, they are free to do so.
3. No complaints or violations were raised by the employees against this clause. From the interview with the employees, interaction with the facility management, review of documents, it was noted that employees are working voluntarily and during the facility tour, employees did not appear to be under pressure. Interview with employees and tour of the facility did not show the evidence of prison labour in the facility.

Employees can leave employment after reasonable notice

Any other comments: NIL

A: Is there any evidence of retention of original documents, e.g. passports/ID's

- ☐ Yes  
☒ No

If Yes please give details and category of workers affected

B: Is there any evidence of a loan scheme in operation

- ☐ Yes  
☒ No

If yes please give details and category of worker affected

C: Is there Any evidence of retention of wages /deposits

- ☐ Yes  
☒ No

If yes please give details and category of worker affected



D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:
E: If any part of the business is UK based / registered & turnover is 36m+ there is a requirement to publish a 'modern day slavery statement'. Is there a modern day slavery statement published	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:   <input checked="" type="checkbox"/> Not applicable
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 Please describe finding:
F: Does the site understand the risks of forced / trafficked / bonded labour in it's supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:   <input type="checkbox"/> Not applicable If yes please give details and category of worker affected
G: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:

### Non-compliance: NIL

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

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

Local law and/or ETI requirement

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

**2. Description of non-compliance:**
☐ NC against ETI    ☐ NC against Local Law:    ☐ NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

**Observation:**

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

**Good Examples observed:**

Description of Good Example (GE):

Objective evidence observed:

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

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Facility Policy

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

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

1. Details: There is no works committee in place.
2. The facility has open door policy where the workers can meet the factory manager at any time.
3. A complaint /suggestion /box provided.

Any other comments:

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input checked="" 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	<input type="checkbox"/> Yes

worker's committee?	<input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) e.g. H&S, sexual harassment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Describe:  Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: Not Applicable	
F: Name of union and union representative, if applicable:	NA	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees? .	NA	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election NA
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA
K: Were worker representatives/union representatives interviewed	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: NA	
L: State any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	NA	
M: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
N: If <b>Yes</b> what percentage by trade Union/worker representation	____% workers covered by Union CBA	____% workers covered by worker rep CBA

O: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
--	---

Non-compliance: NIL	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  No Non Conformance observed <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>   <b>2. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>
<b>Good Examples observed:</b>	
Description of Good Example (GE):	<b>Objective evidence observed:</b>

### 3: Working Conditions are Safe and Hygienic

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

#### ETI

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

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

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

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

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

#### Current Systems and Evidence Examined

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

1. **Current systems:** Onsite emergency plan
2. Factory licence
3. Approved plant layout
4. Stability certificate
5. Water Potability Test Report
6. List of Chemicals
7. MSDS of chemicals
8. Training record of fire
9. Fire extinguisher service record
10. First aid training certificate
11. Fire Fighting & Evacuation Drill Record
12. Health & Safety committee meetings record
13. Training record
14. Risk Analysis document
15. Medical Check up report.

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

- Emergency Preparedness and Response-
- Contact Person Mr. Manoj Kumar Asst Manager -EHS
- On site emergency Preparedness plan- Made on 30-05-2001 and shared with Fire Department,
- Mock drill—being conducted every quarter , 31-10-17 at 23 .00 hrs ,night time, 11-09-17 at 11.00hrs .,17-04-17 at 11.30 hrs and 7-03 2017 at 15.00 hrs .
- Assembly point- 1
- Fire Alarm- 15, call points -8 Tested Monthly last done on 01-10-2017



- First Aid Boxes--7
- First Aid Training- 18- Employees were trained. / attended One day course conducted by the Safety circle approved by St Ambulance SAS NAGAR Mohali certificate issued by N K Saini Lecturer St John Ambulance .
- No of First Aid Trained personnel—18.
- Fire Fighting Training –12 –Employees were given /participated one day programme conducted by institute of Safety , Occupational Health & Environment on 29<sup>th</sup> Dec, 2016 recognised and certificate issued by the chief Inspector of Factories and Boilers-Goa.
- Internal Fire Fighting Training was given to all employees . 1 On 9-03-2017 2. 17-04-17 3. 11-09-2017 by Amit Fire Fighter Haridwar
- No of Fire Hydrant Points –.6, Being inspected every month , Last done 10-17 w
- No of Fire EXTINGUISHERS-68 yearly maintenance being done -last done in May /June 2017 Next due on may /june 2018 .
- Hydro Test done – By Amit Fire Fighter Haridwar on 05/06/2017
- Emergency Lights-15 being checked weekly .
- Safety committee- consisting 13 members. Mr. BP. Sharma Chairman, Worker participation seen-Meeting held last on 12-10-17, Quarterly meeting are conducted .

#### Mechanical / Production Details:-

PRESURE VESSEL -Test Reports—done on 05/07/2017 by M.M.S. Rawat Chartered Engineer & competent Person certificate ref no .643 F/ Uttarakhand as per rule no 28/29/31 and 21 ( 2 ) /6/20.

#### Electrical Department---

- Electrical Inspectors Inspection Report:- T S NO 505/15-16 Dated 3-9-16 by Asst Engineer , Electrify Dept Govt of Goa
- Test Certificate of 33KV Transformer oil –By Reliance Electricals dated 29-09--2017.
- Earth pit locations-- Total nos- 39 , Frequency of Testing - once in a year , Last done on 10/11//2017 BY Verma Electrical & Mechanical works .Haridwar.
- .
- Drinking water Report – FARELABS Food Analysis & Research Laboratory Test report no
- Accident Register --No of minor injuries Recorded-- NIL during 2016 and 2017 till September
- . Investigation reports---seen
- Medical check-up of all employees done including Audiometry test on 11-11-2017 by Himalayan Hospital JOLLY Grant , Dehradun . Frequency yearly ..
- Ambulance.—NA
- CANTEEN---NA . Dining Area verified
- PURCHASE--Communication of Health and safety policy to the vendors .as per para 6.4 of the manual made .
- Hazards Identification and Risk Assessment done on 20-03-2017.
- IMPROVEMENT POINTS\_  
The LUX MONITORING done as per IS 3646 / BRC Standard , for every year last done on 13/11/2017

<p>A: Does the facility have general Health &amp; Safety and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
<p>B: Are the policies included in worker's manual?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: NOT applicable
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: NA
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid</p>	<input type="checkbox"/> Yes Not Applicable <input type="checkbox"/> No Details:
<p>G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:
<p>H: Secure personal storage space is provided for workers in their living space and is fit for purpose</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Each worker is provided with Lockers

I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
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 Please describe
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 Please describe

### Non-compliance: 0

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

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

.No non- conformance observed

Local law and/or ETI requirement Not Applicable

Recommended corrective action: : Not Applicable

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

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

Local law and/or ETI requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:NIL

Description of observation:

Local law or ETI requirement:

Recommended corrective action:

Objective evidence observed:

Good Examples observed:NIL

Description of Good Example (GE):	Objective Evidence Observed:
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#### 4: Child Labour Shall Not Be Used

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

##### ETI

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

#### Current Systems and Evidence Examined

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

##### Current systems:

1. Personal Files of employees
2. Recruitment Policy

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

A: Legal age of employment	18 Years
B: Age of youngest worker found:	As per record all workers are above 18 years of age
C: Children present on workforce but not working at time of audit	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable as there was no site visit
D: % of under 18's at this site (of total workers)	%
E: Workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No If Y give details NOT Applicable

**Non-compliance:nil**

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

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



## 5: Living Wages are Paid

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

### ETI

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Employee Provident Fund Receipts
2. Profession tax receipts
3. Workmen Compensation policy
4. Pay slips
5. Bonus record

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

1. Details: The time in time out records
  2. Wage slips have been provided in the local language.
- ESI & EPF challans have been verified for the month of May, June 2017

### Non-compliance:0

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

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

No non-conformance observed

Local law and/or ETI requirement: Not Applicable .

Recommended corrective action: Not Applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

As per verification of records

<b>2. Description of non-compliance: No4</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	As per verification of records and discussion with the management.
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<b>Observation:</b>	
<b>Description of observation:</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

<b>Good Examples observed:</b>	
Description of Good Example (GE):	<b>Objective Evidence Observed:</b>

### Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum:  48 hours per week	48 hrs per week	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hrs per day / 12 hrs per a week / 50 hrs per quarter	Within legal limit	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
D: wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: As per the Notification of Karnataka Govt ,	Could not be verified as there is no time -in	<input type="checkbox"/> Yes <input type="checkbox"/> No

	minimum Un-Skilled—INR 400.00 pd, & Skilled -INR 425.00pd	and Time-out records	
E: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of the minimum wages	200 % of the minimum wages as prescribed by Govt	<input type="checkbox"/> Yes <input type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: If <b>No</b> , why not?		
C: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26	
D: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If <b>Yes</b> , please give details: As per the Notification of Goa Govt for Un- Skilled Workers INR 307/- Semi skilled INR 368/- and for Skilled workers –INR 423/-
E: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If <b>No</b> , please give details:
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: Note: full time employees and please state hour / week / month etc.	Please indicate the breakdown of workforce per earnings:
	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	____% of workforce earning under min wage ____% of workforce earning min wage __100__% of workforce earning above min wage
G: Bonus (amount specify)	Bonus Scheme found: Note: full time employees and please state hour / week / month etc.	

H: What deductions are required by law e.g. social insurance? Please state all types:	ESI, EPF & PT	
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please describe	
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                      Time-in and Time –out records not evidenced	
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input type="checkbox"/> Poor record keeping <input checked="" type="checkbox"/> No <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:	
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>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please specify amount/time: As notified by the Karnataka govt	
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: As per Govt of Goa notification	
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 Details: As per notification of the govt of Karnataka from time to time	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:	
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other explain:	

## 6: Working Hours are not Excessive

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

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

### ETI

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

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

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

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

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

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

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

## Current Systems and Evidence Examined

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

### Current systems:

1. In/ out time record of facility employees
2. Attendance record
3. Wage record

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

1. Facility works in general shift.and also in 3 shifts  
Time records of facility employees available

### Non-compliance:0

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

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

No non conformance observed

Local law and/or ETI requirement: . NA

Recommended corrective action: : NA

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

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

Local law and/or ETI requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

### Good Examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

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### 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: Face reading time keeping records														
B: Is sample size same as in wages section	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, please give details														
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Details													
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, please complete as appropriate: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <td style="width: 25%; text-align: center;"><input type="checkbox"/> 0 hrs</td> <td style="width: 25%; text-align: center;"><input type="checkbox"/> Part time</td> <td style="width: 25%; text-align: center;"><input type="checkbox"/> Variable hrs</td> <td style="width: 25%; text-align: center;"><input type="checkbox"/> Other</td> </tr> <tr> <td colspan="4" style="padding: 5px;">If "Other", Please define:</td> </tr> <tr> <td colspan="4" style="height: 30px;"></td> </tr> </table>		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other	If "Other", Please define:							
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other												
If "Other", Please define:															
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If Y please %detail hours, % and types of workers & affected and frequency  Details no contract employment were given													
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	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:	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):															

	NIL	
<b>Standard/Contracted Hours worked</b>		
G: Standard working hours over 48 per week found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, please give details
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	NIL
J: Combined hours (standard/contracted plus= total) 60 found?	NO	
K: Approximate percentage of total workers on highest overtime hours	___0___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:
<b>Overtime Premiums</b>		
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	Please give details of normal day overtime premium as a % of <b>standard</b> wages:
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe % of workers & frequency: As per law
O: ETI Code requires a prevailing standard to give greatest worker protection.	<input checked="" 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	



<p>If a site pays less than 125% OT premium <u>and</u> this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.</p>	<input type="checkbox"/> Other
	Please explain any checked boxes in N above e.g. detail of consolidated pay CBA or Other.
<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. Multi select is possible.</p>	<div> <input checked="" type="checkbox"/> <b>Overtime is voluntary</b>  <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week  <input type="checkbox"/> Safeguards are in place to protect worker's health and safety  <input type="checkbox"/> Site can demonstrate exceptional circumstances  <input type="checkbox"/> Other reasons (please specify) </div> <div> Please explain any checked boxes in R above </div>
<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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please describe
<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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 7: No Discrimination is Practiced

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

### ETI

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

### Current Systems and Evidence Examined

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

**Current systems: The facility is having no discrimination Policy**

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

Details: **The facility is having no discrimination Policy**

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: _100_ % Female _0_ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst	#: 0
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement         NO

### Professional Development

A: What type of training and development are available for workers?	Please give details ON the job training
---	---

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

Non-compliance: NIL	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>NO Non conformance observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p> <p><b>2. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>

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

### Good Examples observed:

Description of Good Example (GE):

Objective Evidence  
Observed:

## 8: Regular Employment Is Provided

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

### ETI

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

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

### Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

## Current Systems and Evidence Examined

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

### Current systems:

1. Personal records of employees
2. Work Order between facility and employee.

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

1. All the employees are working on a regular basis in the facility. And also provided by sub contractor
2. The factory does not engage any employee for home work.
3. No appointment orders have been provided

**Non-compliance: NIL**

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

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

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

## Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented  <input type="checkbox"/> Understood by workers  <input type="checkbox"/> Same as actual conditions</p> <p>If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>

C: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes Please describe details and specific category(ies) of workers affected
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:	Personnel files of the employees

### Migrant Workers:

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 and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

B: Type of work undertaken by migrant workers:	No Migrant workers	
C: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used	
D: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:	Observations Not Applicable
E: Are Any migrant workers in skilled, technical, or management roles  <b>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal)</b>	#: NA <input type="checkbox"/> Yes <input type="checkbox"/> No  If Yes number and example of roles	

workers)

## NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other
C: If any checked, give details:	

Agency Workers (if applicable)	
(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):	3 And names if available
B: Were agency workers' age/pay/hours included within scope of this audit	<input checked="" type="checkbox"/> Yes NA <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes NA <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input checked="" type="checkbox"/> Yes NA <input type="checkbox"/> No



	Details
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input checked="" type="checkbox"/> Yes NA <input type="checkbox"/> No  Please describe:

### Contractors:

*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,*

A: Any contractors on site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: If Y, how many contractors are present
B: If <b>Yes</b> , how many workers supplied by contractors	70
C: Do all contractor workers understand their terms of employment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:
If <b>Yes</b> , please give evidence for contractor workers being paid per law:	Checking the wage bills and wage slips

## 8A: Sub-Contracting and Homeworking:

**8A: Sub-Contracting and Homeworking**
[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

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

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

*Note to auditor on homeworking:*
*Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.*
*Note to auditor on subcontracting : auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers*
**Current Systems and Evidence Examined**

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

**Current systems:**

NOT APPLICABLE

**Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):**
**If any processes are sub-contracted – please populate below boxes**

Process Subcontracted	Process 1	Process 2
Name of factory		
Address		

Process Subcontracted	Process 3	Process 4
Name of factory		
Address		

Process Subcontracted	Process 5	Process 6
Name of factory		
Address		

Details:

**Non-compliance: NIL**

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

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

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

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please describe:</p>

B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes NA <input type="checkbox"/> No If <b>Yes</b> , summarise details:
C: Number of sub-contractors/agents used	NIL
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes NA <input type="checkbox"/> No If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	Age proff records verification

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
F: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , summarise details:		
G: Number of homeworkers	Male:	Female:	Total:
H: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		
I: If through agents, number of agents			
J: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
K: How does site ensure worker hours and pay meet local laws for homeworkers?			
L: What processes are carried out by homeworkers?			
M: Do any contracts exist for homeworkers	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
N: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

## 9: No Harsh or Inhumane Treatment is Allowed

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

### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: complaints and grievances box
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Yes . suggestion box available
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion and com plaints box
D: Is there a grievance mechanism is place for:	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other Details:
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details
F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms (e.g., help lines or whistle blowing mechanism	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No Please give details

H: Is there a published and transparent disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No please explain
I: If yes, are workers aware of these the disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no please give details
J: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details

### Current Systems and Evidence Examined

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

#### Current systems:

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

Details:

### Non-compliance: NIL

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

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

No non conformances observed

#### Local law and/or ETI requirement:

#### Recommended corrective action:

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

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

#### Objective evidence observed:

(where relevant please add photo numbers)

<p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	
--	--

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

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

10. Other Issue areas: 10A: Entitlement to Work and Immigration <i>(Click here to return to NC-table)</i>
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>

Current Systems and Evidence Examined
<p><i>To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.</i></p>
<p><b>Current systems:</b></p> <p>NOT APPLICABLE</p>

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

Details:

### Non-compliance: NIL

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

No non compliances observed

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

**Recommended corrective action:**

#### Objective evidence observed:

(where relevant please add photo numbers)

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

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

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

**Recommended corrective action:**

### Observation: NIL

**Description of observation:**

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

**Comments:**

**Objective evidence observed:**

### Good examples observed: NIL

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

**Objective Evidence Observed:**



### 10. Other issue areas 10B2: Environment 2-Pillar

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

### Current Systems and Evidence Examined

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

#### Current systems:

NOT APPLICABLE

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

### Non-compliance:NIL

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

**Observation: NIL**

Description of observation:

Local law or ETI/additional elements requirement:

Comments:

Objective evidence observed:

**Good examples observed: NIL**

Description of Good Example (GE):

Objective Evidence Observed:

## 10. Other issue areas 10B4: Environment 4-Pillar

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

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

### B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

### B4. Guidance for Observations

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

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

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

## Current Systems and Evidence Examined

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

### Current systems:

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

Details: 1. Environmental Details:-

Legal and other Requirements:-Contact Person--Mr.B.P Sharma DGM –Sales & Commercial and Head of EHS COMMITTEE.

- Register of Regulations-Status as on 01-01-2017. Doc.no. nil verified.
  - Renewal of Combined consent under U/S.25/26 Of the water ( Prevention & Control of Pollution ) Act ,1974- Consent-Consent U/S 21 of the Air ( PREVENTION & Control of Pollution) Act 1981 and Renewal of Authorization under Rule 6( i) of Hazardous waste management & handling rules –NO UEPPCB/HO/CON-F-1/2018/233 Dated 04/05/2017 valid till.31-03--2017..
  - Water cess---Payment of water cess paid as per Assessment order no UEPPCB/HO/Cess-172/2016-17/6072-1209 dated 21-09-2016 for Rs. 78, 544/- through Bank draft no 804247 dated 12-10-2016
  - Annual Report in Form –V for the year 2016-17 submitted vide no nil Dated 28<sup>th</sup> September 17.
  - TEST REPORTS---
  - DG Set –on3 ( 1010 KVA x2 + 750 KVA )
    - Inspection Report of Asst Engineer , uttarakhand Admininstration letter no 289/c-7 dated 10-11-2017 for 3 DG Sets
    - Stack Emmission Report of DG 1010 KVA ( 1 ) Report no UK10/014817 Dated 26-06-17
    - Stack Emmission Report of DG 1010 KVA ( 2 ) Report no UK10/014717 Dated 26-06-17
    - Stack Emmission Report of DG 750 KVA ( 1 ) Report no UK10/014917 Dated 26-06-17
  - Inspection Report of Asst Engineer , uttarakhand Admininstration letter no 288/c-1 dated 10-11-2017 for 2000 KVA And Transformer 2500KVA + 1000 KVA ransformer
  - ETP Inlet EFFLUENT WATER test report no UK06/025217 dated 26-06- 17 by Sophisticated Industrial Materials Analytic vt Lab.
  - Ambient Air monitoring Test Report no uk06/024917 dated 26-06 2017 by SIMALab at locations 1. Main Gate -2. Behind IQF/AD3. Infrot of FD
- Work place Noise Monitoring Report –No. AACPL/TE/DD/1872.35 Dated 10-08-17
  - , Locations – Near Security Surrounding area , FD Plant room,Boiler area FD Production FD Production AREA ,IQF Plant room , during day time and night time .
  - Risk Assessment on the Environment Impact—Doc no Env /Doc/01 dated 22-04-2016.

**Non-compliance:nil**

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

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

Environmental Analysis	
(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)	
A: Responsible for Environmental issues (Name and Position):	Mr. B.P Sharma DGM –Sales & Commercial and Head of EHS COMMITTEE.
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 Details:
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please detail.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, is it publicly available?
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 Details:
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please detail. (For guidance, please see Measurement criteria)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:
H: Have all legally required permits been shown? Please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A Details:
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 Details:
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Reduction of water and electricity consumption by 5 %
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input type="checkbox"/> No NA Details:
M: Facility has a system in place for accurately	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards	Details:	
N: Facility has checked that any Sub-Contracting agencies or business partners operating on the premises have 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 Details:	
<b>Usage/Discharge analysis</b>		
Criteria	Current year: Please state period:12 Months _____	Previous Year: Please state period: _12 months _____
Electricity Usage: Kw/hrs	3659460KW	3716616 KW
Renewable Energy Usage: Kw/hrs	NIL	NIL
Gas Usage: Kw/hrs	NIL	NIL
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	NA	NA
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> <li>• Bore well</li> </ul>	<ul style="list-style-type: none"> <li>• Bore well</li> <li>• </li> <li>• </li> </ul>
Water Volume Used: (m <sup>3</sup> )	1438cu.mtr	1652cu mtr
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> <li>• Gardening</li> <li>• </li> </ul>	<ul style="list-style-type: none"> <li>• Gardening</li> <li>• </li> <li>• </li> </ul>
Water Volume Discharged: (m <sup>3</sup> )	1652cu mtr	1336 cu.mtr
Water Volume Recycled: (m <sup>3</sup> )	500	550
Total waste Produced (please state units)	NIL	NIL
Total hazardous waste Produced: (please state units)	NIL	NIL
Waste to Recycling: (please state units)	NIL	NIL
Waste to Landfill:	NIL	

(please state units)			
Waste to other: (please give details and state units)	NIL	NIL	
Total Product Produced (please state units)	7200Tonnes ( Paper conversion )	6500Tonnes ( Paper conversion )	



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

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

To be completed for a 4-Pillar SMETA Audit

#### 10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

#### 10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. .

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

#### Current Systems and Evidence Examined

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

#### Current systems:

The Company is following the Business Ethics policy of their head office /corporate office

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

Details: 1. Business policy 2. Whistle Blower policy 3. Gifts policy 4.Bribery Policy

The facility communicated all the policies to their suppliers

### Non-compliance: NIL

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

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

☐ NC against Local

No Non compliance observed

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

**Recommended corrective action:**

#### Objective evidence observed:

(where relevant please add photo numbers)

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

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

☐ NC against Local

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

**Recommended corrective action:**

### Observation

**Description of observation:**

**Objective evidence observed:**

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

**Comments:**

### Good examples observed:

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

**Objective Evidence Observed:**

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  Please give details: Head office guide lines are being followed
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues	yes
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:
D: Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:

#### Other Findings Outside the Scope of the Code

nil

#### 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)*

nil

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code.</b> Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Human Rights	0.A. Human Rights
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for</p>	

<p>compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the</p>	

workers. 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.	
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
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.	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
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.	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
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	

<p>following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use</p>	

<p>of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	
10B2.1 Suppliers must comply with the requirements	



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

### 10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

### 10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.

## Photo Form









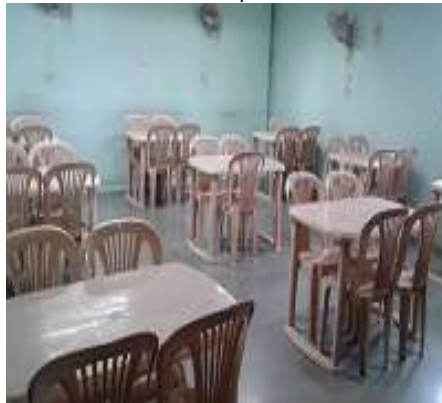
**Adding Images** To help keep the size of the Report as small as possible for ease of sending and saving the document we recommend that you use Microsoft Paint to resize your photos. To do so please follow these instructions:

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

Save As jpeg (this provides compression to make the file smaller).

6) Please delete this text once complete.

The principle Employer did not allow to take photos

<p>Inse</p>  <p>rt p hoto</p>	<p>Ins</p>  <p>ert photo</p>	<p>Insert</p>  <p>photo</p>
Entrance to Factory	Environmental Data Board	Transformer area
<p>Insert p</p>  <p>hoto</p>	<p>InsertP</p>  <p>t photo</p>	<p>Insert</p>  <p>photo</p>
Evacuation Plan	Assembly point	Display of Policies
<p>Insert</p>  <p>t poto</p>	<p>Insert</p>  <p>photo</p>	<p>Insert ph</p>  <p>oto</p>
Face reading Time Keeping	Neat Production Dept	Dining Room



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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5Iw_3d_3d)

**[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)