




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 411603774	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 412643799
Business name (Company name):	IMAANS SHOES PRIVATE LIMITED		
Site name:	IMAANS SHOES PRIVATE LIMITED		
Site address: <i>(Please include full address)</i>	#114, 115, 71 ST CROSS STREET, PWD BUNGALOW ROAD, NALLUR VILLAGE, SOLAVARAM, CHENNAI- 600 067	Country:	INDIA
Site contact and job title:	Mr. Irshad Ahmed Kaka – Managing Director		
Site phone:	+91 9176644197	Site e-mail:	irshad@imaansshoes.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	12-11-2020 & 13-11-2020		

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

[BSIV 739554](#) at [IMAANS-0047794186-000](#)

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: S. PADMANABHAN APSCA number: RA 21703124

Lead auditor APSCA status: In good Standing

Team auditor: APSCA number:

Interviewers: S. PADMANABHAN APSCA number: RA 21703124

Report writer: S. PADMANABHAN

Report reviewer: Mr. N. Bharathi

Date of declaration: 12-11-2020

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> Nil
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> Nil
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> Nil
2 Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> Nil
3 Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02		01	<ul style="list-style-type: none"> 1. Form 8 for Compressor not evidenced for the period 2nd Half – 2020 2. Noise level testing not done for the Generators 200 KVA and 45 KVA <p>Good Example: Organisation has well implemented the COVID 19 Requirements, evidenced through interviews, displays and training records</p>

4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• •
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01		01	On review of ESI and PF Remittances, delay in remittance of ESI is observed from April 2020 to September 2020 and delay in remittance of PF is observed from April 2020 to August 2020 . Good Example : Over time work is not offered to the employees, workers are free to leave the factory at the end of the working hours
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• Nil •
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				• Nil •
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• Nil •
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• Nil •
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• Nil

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

General observations and summary of the site:

Below is the summary of the site based on factory tour, workers interview, management interview and documentation review.

- The organisation is involved in the
- Manufacture and Export of Leather shoe upper and full shoes through the processes of Purchase of Raw material, Clicking, Closing, Full shoe, Finishing, Inspection, Packing and dispatch.
Outsourced Processes: Nil
Contracted Processes: Nil
- Overall responsibility for ETI Base Coded standards is taken by Mr. G. Mohammed Iliyas – Factory manager and Mr. V. Aftab Alam – Technical Manager is the Health and safety Representative
- There is a total of 82 employees on site out of which 13 are male and 69 are female and present on the day of audit is 75, Male 13 and Female 62
- The youngest worker on site is 21 years 10 Months, 11 days. Date of Joining of the employee 29.05.2017 and Date of Birth of the Employee is 06.01.1999. No young and child labour observed during the audit. No historical child labour noted.
- There is no union at this factory. Should there be any dissatisfaction and grievances, workers may have channelled their complaints through grievance mechanism /Suggestion boxes
- There is evidence of both male and female in management and among supervisor. The distribution of manpower is Male 15 %, Female 85 %.

- No discrimination, No Harsh treatment and No Forced labour identified in the factory. Workers are given equal opportunity in work distribution, enjoying benefits according to the legal requirement, promotions and move freely without any restriction.
- Site has orders throughout the year, there is no specific Peak or lean season
- 10 workers were randomly selected for interview covering 8 Female and 2 Male workers; they were interviewed as 2 group of 3 workers and 4 workers were interviewed individually. As per the outcome of the interview, they are equally treated and entitle to benefits as required by the local regulation. All workers said they were satisfied with their employment.
- Standard working hours in the facility is 8 hours a day, 48 hours per week and rest on Sunday. No Over Time work is offered to the employees in the facility. Workers are free to leave the premises on the end of the working hour
- All workers are paid above the Minimum wage notification (Please refer to clause 5 for more details) per month and provided with payslip at least one day before the salary day. No late salary payment noted.
- Fire-fighting equipment such as fire extinguishers, fire alarm are well maintained regularly. These equipment was found in good order and reachable at the time of audit. Exit doors and evacuation path are cleared without any obstruction.
- Safety training on use of PPE COVID 19 and fire drills were provided to workers.
- Drinking water and toilets were adequate and available for workers. No restriction was found imposed to the workers to access to such facilities.
- No Accommodation is provided by the organisation to the workers.

Policies implemented by the organisation are posted in the notice board and workers are provided training on ETI Base code.

**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:	IMAANS SHOES PRIVATE LIMITED	
B: Site name:	IMAANS SHOES PRIVATE LIMITED	
C: GPS location: (If available)	GPS Address: 13° 13' 14.53253" N 80° 9' 46.60632" E	Latitude: 13.2207 Longitude: 80.16295
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Legal Compliances:</p> <ol style="list-style-type: none"> 1. Verified Factory License No: TVR 10810, issued by Joint Director of Industrial Safety and Health, Thiruvottiyur, Chennai Maximum of 100 employees and 129 HP. Valid up to 31.12.2020, Submitted the original licence along with Form A2 for renewal on 06.10.2020. 2. Verified the Fire NOC No: 9707/B/2019 Dated 08.01.2020, Issued by Assistant District Officer – Fire rescue services Thiruvallur. 3. Verified the Sanitary certificate L. DIS. No.4239/E2/2020, dated 08.09.2020, issued by Deputy Director of Health Services Thiruvallur. 4. Verified GST 33AACCI9211J1ZP Dated 01.07.2017 5. Verified Import and Export License 0404029019 dated 21.02.2005, File No: 04/04/131/50379/AM19 dated 09.05.2018. Issued by Foreign trade development officer, Chennai. 6. Verified the Building complete plans are approved by the Joint Director of Industrial Safety and Health, Thiruvottiyur through Letter No. NIMU No E/1594/2018 Dated 27.09.2018 7. Verified the Building Stability done by Er. V. Ezhilarasan (DISH Approval No : H1/14688/2018 dated 11.09.2018) dated 18.12.2019. Valid for 3 years from the date of issue. 8. Verified the installation approval of 200 KVA Genset Vide letter No 1451/E1/PON/R32/2020 Dated 04.11/2020. And for 45 KVA Genset Vide letter No 1457/E1/PON/R 32/2020 Dated 04.11.2020, approved by Electrical Inspector , Ponneri Division. 09. Verified the Test certificate of lifting machines and lifting tackles prescribed under Rule 55(a) as per the section 29 of Factories Act 1950 for 2.0 tons of Hydraulic hand pallet truck Dated 28.10.2020 tested by Mr. T. V. Thuvivendhan , competent person under inspector of Factories No H1/24523/2019. 10. Verified the Drinking water test certificate done by CVR Labs private Limited Report No: 20110017.16 Dated 06.11.2020, concluded that the water sample is Physically, chemically and bacteriological potable. 11. verified the Noise level monitoring report done by CVR Labs private Limited Report No : 20110017.19. 07-08 Dated 04.11.2020 - tested at centre of full shoe area and centre of upper section 	

	<p>area and it concluded that the noise level is within the permissible Noise level limits is 90Db(A) as per factories act.</p> <p>12. Verified the Ambient air Quality survey report done by CVR Labs private Limited Report No : 20110017.19.02 and 01 Dated 06.11.2020 , The SPM, SO₂, NO_x, Pb, CO, RSPM, Lead ammonia, Ozone, benzene, Arsenic, nickel, Benzo(A)pyrene - concluded that the above samples complies as per NAAQS limit .</p> <p>13.. verified the Lux level monitoring report done by CVR Labs private Limited Report No : 20110017.19-12 Dated 04.11.2020 - tested at various locations including full shoe- inspection area, full shoe- stitching area, upper section inspection area, upper section stitiching area. Lux Level ranges from minimum of 596 at upper section stitiching area and 787 at Full shoe inspection area.</p> <p>14. Verified the Internal Air Quality monitoring report done by CVR Labs private Limited Report No : 20110017.13 and .14 Dated 06.11.2020, Tested for RPM, SPM, SO_x, NO_x, Pb and CO% and concluded that results are within the limits</p> <p>15. Verified the DG Set stack monitoring for 200 KVA and 45 KVA done by CVR Labs private Limited Report No : 20110017.03 and .04 Dated 06.11.2020 , Tested for SO₂, NO_x, CO, CO₂, O₂ and PM and concluded that the results are with in the permissible limits.</p>												
<p>E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc</p>	<ul style="list-style-type: none"> • Manufacture and Export of Leather shoe upper and full shoes through the processes of Purchase of Raw material, Clicking, Closing, Full shoe, Finishing, Inspection, Packing and dispatch. Outsourced Processes: Nil Contracted Processes: Nil 												
<p>F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Shed 1 & 2</td> <td>650.44 Sq. Mt</td> <td>Clicking and closing</td> </tr> <tr> <td>Shed 3</td> <td>753.5 Sq. Mt</td> <td>Bottoming, MD cabin, full shoe material stores, chemical stores, PED, Finished goods storage, Gen set and compressor</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table>	Production Building no	Description	Remark, if any	Shed 1 & 2	650.44 Sq. Mt	Clicking and closing	Shed 3	753.5 Sq. Mt	Bottoming, MD cabin, full shoe material stores, chemical stores, PED, Finished goods storage, Gen set and compressor	Is this a shared building?	No	
Production Building no	Description	Remark, if any											
Shed 1 & 2	650.44 Sq. Mt	Clicking and closing											
Shed 3	753.5 Sq. Mt	Bottoming, MD cabin, full shoe material stores, chemical stores, PED, Finished goods storage, Gen set and compressor											
Is this a shared building?	No												

	<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Verified the Building Stability done by Er. V. Ezhilarasan (DISH Approval No : H1/14688/2018 dated 11.09.2018) dated 18.12.2019. Valid for 3 years from the date of issue</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Consistent throughout the year</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Organisation was established In the year 2003. It is Private Limited company</p> <p>Products being produced: Mens, Ladies, Kids formal and casual shoes, semi orthopaedic shoes, Dancing shoes</p> <p>Countries Exported – USA, UK and Netherlands.</p> <p>List of Machines: Cutting machine – 11Nos Beam cutting – 1 Nos Sewing machine – 40 Nos Fusing machine – 3 Nos Skiving machine – 4 Nos Stamping machine- 4 Nos Printing machine-1 No Crimping machine-1 No Toe lasting cemented machine – 2 Nos Toe lasting stitchdown construction-1 No Heel mulling machine- 2 Nos Roughing machine -2 Nos Founding machine-1 Nos</p>

	<p>Side Lasting machine- 2 Nos Heat setting machine-2 Nos Hot air blower machine-1 No Heel crowning machine-1 No Sole cutter-2 Nos Sole reactivator- 2 Nos Sole pressing machine-3 Nos Chiller- 2 Nos Sole trimming-2 Nos Spray booth – 1 No Counter moulding machine-2 Nos Strobbble machine- 3 Nos Side arm sole stitching machine-3 Nos Hot melt adhesive machine- 1 No Chain sole stitching machine-4 Nos Auto thread cut and auto lock post bed sewing- 2 Nos Genset -2 Nos Compressor-3 Nos Needle detector machine-1 No.</p> <p>Annual Turnover : 10 Crores</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details : No accommodation provided.</p>

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 08:30 A2: Day 1 Time out: 17:00	A3: Day 2 Time in: 08:30 A4: Day 2 Time out: 13:00	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	1 Auditor x 1.5 days		
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 If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Irshad Ahmed Kaka – Managing Director		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	N/A		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is NO Trade Union in the Facility		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	13	0	0	0	0	0	0	13
Worker numbers – female	69	0	0	0	0	0	0	69
Total	82	0	0	0	0	0	0	82
Number of Workers interviewed – male	2	0	0	0	0	0	0	2
Number of Workers interviewed – female	8	0	0	0	0	0	0	8
Total – interviewed sample size	10	0	0	0	0	0	0	10



A: Nationality of Management	Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: Indian B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 _100% C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate D1: _____% hourly paid workers D2: _100_% salaried workers</p> <p>Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: _100_% monthly paid D6: _____% other D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	2 group interview with 3 workers
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 01 D2: Female: 03
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	As per the workers interview, there is no complaints against the facility.
I: What did the workers like the most about working at this site?	Work environment and equal treatment, even if no work is there, the management is paying the full salary.
J: Any additional comment(s) regarding interviews:	Workers having good knowledge about the Emergency evacuation and the procedure
K: Attitude of workers to hours worked:	There is no specific issue with respect to working hours
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, please give details: Qualitative and Quantitative survey to calculate the living wages.	

M: Attitude of workers:

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

10 workers were selected for interview including 02 Male and 08 Female employees, they were interviewed as 2 group of 3 and 4 workers were interviewed individually; in the closed room without the presence of the factory management.

The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and with the current wages which in their view were in line with wages in the locality. They had good relationships with their supervisors and managers who treated them with respect.

Factory management and employees were found cooperative during the interview process without any signs of coaching. In general, workers have expressed their concern in both positive and negative constructive manner throughout their employment in the facility.

Through interview with workers, it was noted that all workers were satisfied with the factory and no negative comment was received.

Management is issuing appointment order and terms & Conditions of employment to all employees on the day of joining in the language understood by the workers.

Copy of Valid Age proof document is being submitted at the time of employment.

It was found that employees were aware of their rights and duties legal minimum wage and deductions. Employees had informed that Manual time card is used for in and out time punching and no complaints on the same.

During employee's interview noted that all of them receive wages on time and through cash on or before 7th of every month.

All the interviewed told they receive salary slip one day before Pay Day and understandable to them. They work voluntarily in the facility including overtime. No overtime work is provided to the employees. Workers are free to leave at the end of the working hours

No discrimination found in any form in facility, everyone was treated equally.

Having good knowledge about their worker representatives and committee members.

Having good knowledge about emergency procedure

Emergency response team available and the members knows their responsibility.

Employees were satisfied with the working conditions inside facility.

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

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

Through interview with worker representative, that they are satisfied with the management and no negative comment raised by them.

O: Attitude of managers:

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

The factory management was found to be co-operative throughout the audit. Provided full access to auditor throughout the audit and they allowed to take photographs

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Description of current status:

Factory implements and maintains systems for delivering compliance to this code.

Mr. G. Mohammed Illiyas – Factory Manger has been made responsible for compliance with the code. Display of ETI Base code is evidenced in English and in local Language. The factory communicates this code to all employees by training as confirmed through training records and interviews conducted. The last training conducted on ETI base was on 30.09.2020 for all employees. ETI Base code requirements are communicated to their suppliers and stakeholders. Also, include direct and indirect suppliers. ETI code displayed in the facility, Displayed Human rights policy and Confidentiality policy. Internal Audit is conducted at a frequency of once in 6 months, last conducted on 08.10.2020. 2 Minor Nonconformances raised – Initiated action, verified and closed. Management Review Meeting is being conducted at a frequency of once in 6 months, last MRM conducted on 16.10.2020.

Details:

Company Policies

Site Tour

Management interview

Documents related to Control of suppliers and sub-contractor

Training records

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Policies are available for all the clauses of the ETI Base Code</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. G. Mohammed Illiyas Job title: Factory Manger</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: A transparent system for confidentially reporting is in place, 04 Confidential Suggestion boxes are available.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The organisation data procedures and its implementation do not have any deviation on the data privacy procedures for worker's information</p>

Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation:</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good examples observed:

Description of Good Example (GE):	Objective Evidence Observed:
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Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: (Oct 19- Dec19) _2.17_ %	A2: This year - (Jan 20-Oct20) _5.25_ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: (Oct 19- Dec19) _10.33_ %	C2: This year - (Jan 20-Oct20) 13_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	13 %	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident Register Maintained and Verified.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 0	F2: This year: Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0___% workers	I2: 12 months ___0___% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers
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0B: Management system and Code Implementation (Click here to return to summary of findings)
<p>0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with</p> <p>0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>

Current Systems and Evidence Examined
<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>Current systems:</p> <p>Factory implements and maintains systems for delivering compliance to this code. Mr. G. Mohammed Illiyas – Factory Manger has been made responsible for compliance with the code. Display of ETI Base code is evidenced in English and in Tamil. The factory communicates this code to all employees by training as confirmed through training records and interviews conducted. The last training conducted on ETI base was on 30.09.2020 for all employees. Total 10 Suppliers are available. The ETI Base code is communicated to the suppliers on 01.05.2019.</p> <p>Details: Company Policies Management interview Documents related to Control of suppliers and sub-contractors Training records</p>

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: No legal or regulations violations made by the organisation.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Policies are available and displayed in the notice board.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Training provided on policies to employees

<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Last training conducted on ETI base was on 30.09.2020 for all employees</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Verified the records of training and training Log.</p>
<p>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).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Mr. O.P Naveed Ahmed – Admin & HR Manager</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mr. G. Mohammed Iliyas – Factory manager</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Yes, Policy is made available and implemented. Verified policy dated 01.02.2020</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Yes, Procedure is made available and implemented. Verified procedure dated 01.02.2020</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessment is available and verified dated 06.07.2020</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1Please give details: Verified Risk assessment Dated 06.07.2020 for process & machines and for COVID 19, it was done on 28.05.2020, addresses the controls to reduce the identified risk.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, Facility have a policy/code which requires for implementation of its own suppliers. Refer policies dated 01.02.2020</p>

Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Verified the Land Rights Policy Dated 01.02.2020 and Displayed in the Facility Entrance also.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Verified the Land Rights Policy Dated 01.02.2020 and Displayed in the Facility Entrance also.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Yes, all legal licences and permissions were available
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The factory is functioning in the Rented Building, Verified the Rental agreement Dated 09.10.2019 Valid till 31.12.2020. All the approvals are verified and addressed in this report.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The factory is functioning in the Rented Building, Verified the Rental agreement Dated 09.10.2019 Valid till 31.12.2020. All the approvals are verified and addressed in this report.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: N/A

Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <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>2. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <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>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>
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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>

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Abstract of the act has been displayed in the local language. Worker interviews, security procedures/interviews, worker behaviour, management behaviour and the facility walkthrough did not evidence any area of concern.
2. No recruiting agents are employed; no deposits or original documents are collected and retained. The employees are free to leave employment on their own will after reasonable Notice.
3. Movement of employee within the premises is not restricted and they are free to leave the facility after work. 10 personnel files were reviewed; the personnel files do not include any original documentation for age verification.
4. The employment contract includes all the areas to be addressed with regard to the standards including working hours, remuneration and the benefits due to them.
5. People are free to leave after the work. Overtime is Voluntary. The company does not withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
6. All the personals who are working in the company have the right to leave the work place premises after completing the standard work day and free to terminate their employment provided that they give reasonable notice to the company.
7. The security Guards at the main gate perform their normal duties. They do not hold the workers inside the premises after end of the working hours.

Details:

- Policy documents (Modern Day Slavery Policy)
- Site Tour
- Worker Interviews (10 Workers)
- Personnel files reviewed (10 files)
- Contracts to establish notice periods

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

- Yes
- No

A1: If yes, please give details and category of workers affected:

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

- Yes
- No

B1: If yes, please give details and category of worker affected:

C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable E1: Please describe finding: Verified the modern day slavery Statement Dated 01.02.2020
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: workers are aware about the risks of forced / trafficked / bonded labour in its supply chain, As discussion with workers during interview, No one affected in the same.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The site and the suppliers do not encourage any form of forced / trafficked / bonded labour. Policies are made available.

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

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

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

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

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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. Laws of the land applicable are Trade Union Act 1926 and Industrial Disputes Act 1947.
- 2. The organization has documented the system for compliance to this requirement. The factory has a written policy which states that workers have the right to lawfully form unions or similar organizations which give them the opportunity to address worker grievances and workplace issues collectively.
- 3. The organization has no trade union. T. Pavithra – Full shoe is the elected worker representative; The Organization has constituted a worker's welfare committee constituted by 03 elected members. Verified the records of Election Dated 03.07.2020. The workers representatives elected on a free and confidential basis by the workers. All the employees participate in the workers welfare committee meeting. This worker welfare committee addresses the workers needs and represents to the management. The Workers welfare committee meets once in 2 months. Verified the Worker Welfare Committee meeting records Dated 09.11.2020 and previous to that on 11.09.2020, in which the workers needs and grievances are addressed.
- 4. Management has an open-door policy to address the employees' needs, as revealed during the interviews.
- 5. The Organisation does not discriminate, penalize, threaten, restrict or interfere with workers choosing to lawfully form or join unions or associations.
- 6. The worker interviews and document review confirm compliance to this standard.
- 7. The Organisation implements systems to establish better worker and management relations such as Health and Safety Committee, Workers welfare Committee and Internal complaints committee.
- 8. Workers Representative are aware about the roles and responsibilities during interview.

Details:

Details of Work force Committee & Workers Representative Interview:
 Policy documents (Freedom of Association Policy Dated 01.02.2020)
 Worker's Welfare committee
 Worker Interviews including Workers Representative (10 Workers)
 Suggestions from suggestion boxes and actions taken

<p>A: What form of worker representation/union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: Please give details: Health and Safety Committee, Workers Committee, and Internal complaints committee and 04 confidential suggestion boxes are available near Both Toilets. Committee's meets at once in 2 Months and suggestion boxes are opened once in 15 days, Last opened on 09.11.2020 and previous to that on 24.10.2020.</p> <p>D2: Is there evidence of free elections? Verified records of election dated 03.07.2020</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: Yes, committee meetings and its records are verified.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>No Trade Union Exits</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Health and Safety Committee, Workers Welfare Committee, and Internal complaints committee</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Date of last election: 03.07.2020</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Were worker representatives/union representatives interviewed?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>If Yes, please state how many: 4</p>	

<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>Yes, workers welfare committee meetings were conducted once in 2 months. Workers welfare committee Meeting conducted on 09.11.2020 and before that on 11.09.2020. The Minutes of workers welfare committee are recorded in the meeting note and signed by the employees. The topics covered are Working hours, Grievances Health and safety related and Remuneration.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If Yes, what percentage by trade Union/worker representation</p>	<p>M1: 0_% workers covered by Union CBA</p>	<p>M2: 0_% workers covered by worker rep CBA</p>
<p>M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No - Wages are paid as per the Tamil Nadu Minimum wages act, as detailed in clause No. 5</p>	

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

<p style="text-align: center;">Observation:</p>	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

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

3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Applicable law : The Factories Act, 1948 and TN factories Rules, 1950, The Environmental Protection Act, 1986, ILO Conventions 155 (Occupational Safety and Health convention), Certified standing orders
1. Organization has addressed all the requirements of Health and Safety in their procedure. Verified the procedure for Risk Analysis- Health and safety Rev No: 00 Dated 01.02.2020
 2. The Organization has a written Health and Safety plan that indicates how all Health and Safety issues are being managed at the factory. The plan includes what steps the factory is taking to ensure that health and safety risk areas are being identified and addressed
 3. Risk Assessment for the following locations reviewed, Verified the Health and safety risk assessment, Document reference No – LSPL/RAR Rev 00 Dated 06.07.2020. Verified the risk assessment for Leather receipt – Loading and unloading, storage of leather, cutting, Fusing, Stamping and screening, splitting, skiving, Latex spray, checking, Attaching, stitching, sole cleaning, front part mulling, upper pasting, heat setting, polishing, roughing, sole and upper reactivate, Air receiving, DG Set, compressor, Electricity, Natural disaster, Manmade disaster, new and expectant mothers, and risk assessment for COVID 19 Dated 28.05.2020.
 4. Mr. V. Aftab Alam – Technical Manger has been appointed as the Health & Safety representative. Organisation has a health and safety committee constitutes of 2 members from Management and 2 members from workers. The worker representatives are freely elected, Verified the records of Election Dated 03.07.2020.
 5. The organization has a health and safety committee; the frequency of Health and Safety committee meeting is once in two months. These committee monitors the fire and risk prevention and report to the Health and Safety Representative and also address during the meeting. Verified the records of the meeting dated 07.11.2020 and previous to that on 10.09.2020.
 6. Organisation has installed 23 Nos of Fire Extinguishers – Fire Extinguishers are checked at a frequency of once in a month by Maintenance incharge. Last checking done on 13.10.2020.

7. Firefighting training is provided by Wings fire Equipments Private limited, Avadi, Chennai for 17 employees on 10.11.2020. Frequency of training is once in 6 months. Training is provided on operation of Fire extinguishers.

8. Three Emergency evacuation plan is displayed at prominent location at production floor In which the location of fire extinguishers, Fire alarms, Smoke detectors and First aid box are identified. During workers interview it is evident that they could able to tell the month in which the fire drill was conducted and methodology to be adopted when emergency siren blows

9. Organisation has installed 12 Nos of Smoke detectors. This is checked at a frequency of once in a month by Maintenance in charge. Last checking done on 13.10.2020

10. Training to first aid was proved to 20 employees (8 Male and 12 Female) by St. Johns ambulance, Urapakkam on 05.09.2020. Certificate is valid for one year.

11. The emergency contact numbers are appropriately displayed near to the entrance.

12. 04 First aid Box with adequate medicines provided.

The first aid box is checked for the availability of first aid medicines at frequent interval by the H & S Representative and it is also discussed in the H & S Committee meeting. First Aid Box Used register available in each first aid box. The list of medicines to be available in the first aid box is displayed near to the FA Box. The medicines available in the first aid box

13. Exits and Emergency Exits have been displayed. Organisation has 5 Exit and 3 Emergency exits.

Assembly area is marked, workers are aware of assembling Point. Assembly area is identified near to the main entrance, which is spacious to accommodate all workers to get assemble.

14. All the workers were seen using the PPEs during working hours. PPE's at company cost provided to workers where ever is necessary. Face mask for all employees, Gloves for the employees working in Pasting section.

15. Health & Safety policy is communicated to workers through induction training, notice boards in English and Tamil

16. Mock Drill Details:

Mock Drill	Evacuation Time	Conducted by	Conducted on	Employees participated
I	160 Seconds	Wings fire Equipments Private limited, Avadi, Chennai	10.11.2020	71
H	155 Seconds	HSR	14.09.2020	47

17. Health & Safety education is provided to all workers during initial orientation and on an ongoing basis. Periodic trainings on Health & Safety are provided to staff & workers, and the same has been verified through records as well as worker interviews. Training was conducted on 24.10.2020 for 68 employees. Training on Fire Mock drill and firefighting is planned once in two months.

18. Pathways are marked with yellow lines and Red arrow marks which directs to the emergency exit and to the assembly point.

19. The organisation have the Anti-smoking policy, Needle policy implemented. Metal detector is used to ensue no needle pieces are available in the shoes before final packing.

20. The generic cabling system for building was designed according to local law. Permanent conduit wiring was in good conditions with no broken junctions or wires sticking out at the ends of the conduit.

21. All electrical wiring and wiring rails were cleaned regularly. Also storage of materials in and around all electrical panels, transformers, etc. were kept away to allow immediate access in the event of an emergency and prevent fire from arching parts.

22. verified the Form 26 - Register of Accidents and Form 26-A, Register of dangerous occurrences – No accidents or Dangerous occurrences happened so far. No evidences of First aid cases / Near Miss so far,

for the past one year. Organization has stated NIL Fire Case, Nil Fatal Accident, Nil Reportable Accident during last one year. No Near Miss recorded.

23. Good Ventilation, Illumination and Work Environment evidenced.

24. Water soluble chemicals are used. MSDS were displayed at the storage area. Medical checkup was done for the employees handling chemicals.

25. Separate Wash Rooms are available in the factory for Ladies(8 No) and Gents(3 No) & are in good condition,

26. 03 Fire alarms are available. This is are checked at a frequency of once in a month by Maintenance In charge. Last checking done on 13.10.2020.

27. Total 03 Nos of Emergency lights are available. This is are checked at a frequency of once in a month by Maintenance InCharge. Last checking done on 13.10.2020

28. COVID 19 Awareness Training Conducted on 08.06.2020 for all employees. Organisation has displayed the awareness posters at notice board, Temperature scanning is done at the entrance by security for all employees and visitors. Sanitizers are provided. Social distancing maintained at work place.

Details:

Health & Safety Policies

Site Tour

Inspection Record / Drill Records

Legal Requirement and Permits

Health & Safety Trainings

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Communicated to all workers through monthly training and policies are displayed in the notice board</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Policies are the part of organisation manual. Policies are available in organisation manual and it is communicated to workers through training programs and through notice board</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Approved building plan was verified with the existing facility and found in order.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are informed about the H & S requirements at the gate by the Management Staff</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: No Medical room present in the facility. But the 04 first aid box and 20 first aid trained persons were available.</p>

F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: All workers are staying nearby to the facility
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: All workers are staying nearby to the facility
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Workers are provided with personal storage space
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: verified the Risk Assessment dated 06.07.2020
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: All the required permits are available and addressed in this report
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: No banned chemicals were used in the facility according to facility tour and document review

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Form 8 for Compressor not evidenced for the period 2nd Half - 2020</p> <p>Local law and/or ETI requirement</p> <p>As per Section 31 in The Factories Act, 1948. Every pressure vessel or plant in service shall be thoroughly examined by a competent person. externally, once in every period of six months</p> <p>Recommended corrective action:</p> <p>It is recommended to apply and get the Form 8 for compressor</p> <p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Noise level testing not done for the Generators 200 KVA and 45 KVA</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>1, Form 8 for First Half - 2020</p> <p>2. Noise level test reports</p>

<p>Local law and/or ETI requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: It is recommended to test the Noise level of Genset at periodic intervals</p>	
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Observation:	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed:</p>

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

4: Child Labour Shall Not Be Used

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ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The factory has hiring policies and procedures that ensured that the minimum age of workers corresponds to all local laws, ILO Standards and other requirements.
2. The age of each worker is verified prior to his or her employment.
3. Updated personnel files are maintained for each worker. Such files have copies of basic worker information such as an identification card, School leaving certificate for age proof, Nomination forms, Appointment order and service records.
4. The factory ensures that these workers are not working beyond the restricted hours and comply with all applicable laws governing minimum working age. No one is under 18 is permitted to work in this factory, however the minimum age for work as per law is set at 15 years
5. There were no young workers. Child labour remediation is established. Worker interviews confirmed the absence of child labour or young workers in the factory.
6. The organization has communicated the requirement by displaying outside the main gate
7. All the workers, staff confirmed that there is no child labour working in the organization.

Details:

- Review of Policy (Health & Safety Policy)
- Site Tour
- Worker interview (10 Workers)
- Management interview
- Document review (10 files)

A: Legal age of employment:	18 Years
B: Age of youngest worker found:	21 years, 10 Months and 11 days
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <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>Objective evidence observed: <i>(where relevant please add photo numbers)</i></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>

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Applicable Laws : Factories Act 1948, The employees provident funds and Miscellaneous provisions Act - 1952, Payment of wages Act - 1936, Tamil Nadu Labour welfare fund act 1972 , Workmen's Compensation Act 1923 , Payment of Bonus act 1965, Payment of gratuity Act 1972, Tamil Nadu industrial establishments(National and festival Holidays Act) 1958, Indian Equal remuneration Act 1958, Industrial employment standing orders Act 1946, Tamil Nadu payment of subsistence allowance Act 1981, Tamil Nadu Manual workers(Regulation of employment and conditions of work act 1982 and Tamil Nadu Industrial establishment (Conferment of permanent status to workmen) Act 1981

1. This facility is categorised in to Employment of Footwear Making Industry under the Minimum Wages Act. G.O. (2D) No. 40, Dated 24/07/2014 Notification No. II (2)/LE/556/2014, Published in T.N. Government Gazette Part II, Section II, Dated 17/09/2014.

2. The dearness Allowance is calculated every month based on the latest price index of Chennai city.

3. The dearness allowance is linked to the Average Chennai City Consumer Price Index for the year 2010, that is 161 points (with base 2001=100) and for every rise of one point over and above 161 points, an increase of Rs.24.25 (Rupees twenty four and paise twenty five only) per month shall be paid as dearness allowance. Below is the Minimum wages (Basic + DA) for Skilled, semi skilled and unskilled workers for the period from November 2019 to Oct 2020

Month	Skilled			Semi Skilled			Un skilled		
	Basic	VDA	Total	Basic	VDA	Total	Basic	VDA	Total
Nov-19	4476	2958.5	7434.5	4191	2958.5	7149.5	3906	2958.5	6864.5
Dec-19	4476	3079.75	7555.75	4191	3079.75	7270.75	3906	3079.75	6985.75
Jan-20	4476	3249.5	7725.5	4191	3249.5	7440.5	3906	3249.5	7155.5
Feb-20	4476	3176.75	7652.75	4191	3176.75	7367.75	3906	3176.75	7082.75
Mar-20	4476	3104	7580	4191	3104	7295	3906	3104	7010
Apr-20	4476	3007	7483	4191	3007	7198	3906	3007	6913
May-20	4476	3104	7580	4191	3104	7295	3906	3104	7010
Jun-20	4476	3152.5	7628.5	4191	3152.5	7343.5	3906	3152.5	7058.5

Jul-20	4476	3273.75	7749.75	4191	3273.75	7464.75	3906	3273.75	7179.75
Aug-20	4476	3346.5	7822.5	4191	3346.5	7537.5	3906	3346.5	7252.5
Sep-20	4476	3346.5	7822.5	4191	3346.5	7537.5	3906	3346.5	7252.5
Oct-20	4476	3371	7847	4191	3371	7562	3906	3371	7277

4. The payroll records reviewed for the last 12 months and details of the following months are recorded on sample basis.

Skilled	Jan-20	Mar-20	Apr-20	Jul-20	Aug-20	Sep-20	Oct-20
No of days attended	24.5	25	26	19.5	24	20	23
FH/NH	2	0	0	0	1	0	1
Wage paid by Organisation	7750	7604	7507	7774	7847	7847	7871
Wage per day	287	292	289	288	302	302	292
HRA Earned	1570	1679	1843	1138	790	1156	1365
Production Incentive	120	316	0	180	0	0	0
OT Hrs	0	0	0	0	0	0	0
OT Salary	0	0	0	0	0	0	0
Gross Salary	9297	9307	9350	6933	8365	7193	8311
PF	913	877	901	674	905	724	840
ESIC	70	70	70	52	63	54	62
Professional tax	115	115	115	115	115	115	115
Nett Salary	8199	8245	8264	6092	7282	6300	7294

Semi skilled	Jan-20	Mar-20	Apr-20	Jul-20	Aug-20	Sep-20	Oct-20
No of days attended	21	25	26	14	21	23.5	23
FH/NH	2	0	0	0	1	0	1
Wage paid by Organisation	7500	7354	7257	7524	7597	7597	7621
Wage per day	278	283	279	279	292	292	282
Prod Incentive	103	33	0	125	0	0	0
OT Hrs	0	0	0	0	0	0	0
OT Salary	0	0	0	0	0	0	0
Gross Salary	6492	7104	7257	4026	6428	6867	6774
PF	767	849	871	468	771	824	813
ESIC	49	53	54	30	48	51	51
Professional tax	53	53	53	115	115	115	115
Nett Salary	5623	6148	6279	3414	5494	5876	5795

Un skilled	Jan-20	Mar-20	Apr-20	Jul-20	Aug-20	Sep-20	Oct-20
No of days attended	19	26	26	18.5	22.5	15	25
FH/NH	2	0	0	0	1	0	1
Wage paid by Organisation	7200	7054	6957	7224	7297	7297	7321
Wage per day	267	271	268	268	281	281	271
Wage per month	5600	7054	6957	4950	6595	4210	7050
Prod Incentive	116	477	0	186	0	0	0
OT Hrs	0	0	0	0	0	0	0
OT Salary	0	0	0	0	0	0	0
Gross Salary	5716	7531	6957	5136	6595	4210	7050
PF	672	846	835	594	791	505	846
ESIC	43	56	52	39	49	32	53
Professional tax	53	53	53	53	53	53	53
Nett Salary	4948	6576	6017	4449	5702	3620	6098

5. Verified the salary slips and wage register. Verified the Salary given to the employees for the past 12 months and found that organisation is paying above the Minimum Wage.

6. The organization remits the ESIC & EPF contributions. Verified the ESI and PF paid challan for the past 12 months and the following month's details are recorded on sample basis from April 2020 to Sept 2020. Delay in remittance of ESI is observed from April 2020 to September 2020 and delay in remittance of PF is observed from April 2020 to August 2020 – Raised as a Minor NC

Month & Year	TRRN No	Remittance Date	ESI Challan No	Remittance Date
Apr-20	4102009018574	23-09-2020	5120131574711	24-10-2020
May-20	4102009018590	23-09-2020	5120131574722	24-10-2020
Jun-20	4102009018832	23-09-2020	5120131574733	24-10-2020
Jul-20	4102009018840	23-09-2020	5120131574744	24-10-2020
Aug-20	4102009019001	23-09-2020	5120131621691	24-10-2020
Sep-20	4102010012954	15-10-2020	5120131574755	24-10-2020

7. Workers are aware of their leave policy, leave wages and bonus.

8. The management has paid 12 % Bonus to the employees for the year 2018-19 on 23.10.2019

Category	Total earned wages	Bonus Amount
Skilled	75586	9070
Semi skilled	70707	8485
Un skilled	72238	8669

9. The management has encashed the Balance EL to the employees on 28.05.2019

Category	Total Worked days	EL Days	EL Amount
Skilled	262	13	4451
Semi skilled	278	14	3783
Un skilled	277	14	3609

10. BNW calculated by BSI for Tamil Nadu Rural is INR 5722.26 as the organisation is located in Vijayanallur panchayat. BNW BY Client based on the Qualitative and Quantitative method is 4978. The Minimum wages paid by the company is 7276.75 and take-home salary is Rs. 6276.20. Hence the take home salary is more than the BNW by BSI and client.

During the worker's interview, it is revealed that workers could able to save at least 10% of the income.

11. The workers are paid through cash on or before 7th of every month. A pay-slip with the details of the payment is provided to the workers one day before they receive their pay.

12. Verified left Employees Settlement Files.

Designation	Stitcher
Date of Join	01.12.2019
Date of Left	17.06.2020
Gratuity	0
EI Days	0
Bonus	5478
Total Paid	5478
Paid Date	27.06.2020

13. There are no piece rate workers employed. And also, no Home workers involved.

14. No Contract employees are engaged in the organisation.

15. No deduction or fine charged on any of worker participating in committee meetings.

16. There is no payroll agency deployed by the organization.

17. No one receives wages on behalf of a worker.

Details:

Wages Record (12 Months)

Time card, Payslips

Living Wage

Worker interview (10 Workers)

Management interview

Document review (10 files)

Non-compliance:

1. Description of non-compliance:

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

On review of ESI and PF Remittances, delay in remittance of ESI is observed from April 2020 to September 2020 and delay in remittance of PF is observed from April 2020 to August 2020 .

Local law and/or ETI requirement:

ESI ACT 1948 - Manner and Time Limit for making Payment of contribution The total amount of contribution (employee's share and employer's share) is to be deposited with the authorised bank through a challan in the prescribed form in quadruplicate on or Before 15th of month following the calendar month in which the wages fall due.

EMPLOYEES' PROVIDENT FUNDS & MISC. PROVISIONS ACT,1952 - PF payment of the employees has to be remitted on or before 15th of following Month

Recommended corrective action:

It is recommended to remit the ESI and PF before 15th of next month

Objective evidence observed:

(where relevant please add photo numbers)

ESI and PF Remittance challans

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:

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day 6 days per week and 26 days per month.	A1: 8 hours per day 6 days per week and 26 days per month.	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 Hours per day and 50 hours per quarter.	B1: No over time work is offered to the employees	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Listed in the tabular column provided in Page No. 41	C1: Listed in the tabular column provided in Page No. 41	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i></p>	<p>Legal minimum: Double salary as premium</p>	<p>D1: No over time work is offered to the employees, Management and employees are aware that Double salary as premium to be paid in case of over time.</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
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<p align="center">Wages analysis: (Click here to return to Key Information)</p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If No, why not?</p>	
<p>B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i></p>	<p>10 Samples from Jan 2020 March 2020, April 2020, July 2020, Aug 2020, Sept 2020 and Oct 2020</p>
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>C1: If Yes, please give details:</p>
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>D1: If No, please give details:</p>
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<p><input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above</p> <p>E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. Minimum Paid to Semiskilled –7276.75 per Month / 279.87 Per Day</p>
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: __100__% of workforce earning above minimum wage</p>
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: Bonus Paid 12 % dated 23.10.2020 Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</p>

<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>12% - Provident Fund 0.75% - Employees state insurance</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>12% - Provident Fund 0.75% - Employees state insurance</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. 2. Please describe:</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:		
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please specify amount/time: Organisation has calculated the BNW.		
<p>M2: If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: please give details: please give details: Organization has calculated the BNW on Qualitative and Quantitative method by means of conducting a survey among the workers. Based on which BNW calculated by the Client is INR 4978		
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Organisation has calculated the Living wage		

<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: As per the National floor level wage</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The organization continued to work on single shift basis. Working hours of the organizations is as follows: 08:30 to 17:00 Hrs Lunch Break – 12:30 – 13:00 and 13:00 – 13:30 Hrs, Sunday is a holiday
2. Over time is voluntary. Verified for the past 12 months,
3. Working hours are recorded in the Manual time card and signed by the workers daily.
4. Holidays are being provided as per the law requirement, Form V displayed in the notice board- Totally 9 Holidays declared for the year 2020.
5. Time records for the last 12 months were reviewed for compliance.
6. Verified the attendance register (Form 12 & 15) – Register of Adult workers (Form 12) combined with Muster roll (Form 25) – for the last 12 months

7. Legal standard work week (hours): 48 Hours and maximum OT per Quarter should not exceed 50 Hrs. Verified and found that working hours are 48 and the organization is aware of that overtime should not exceed 50 hrs per quarter. On verification of the Pay roll records, Wage records and Interview with workers. No overtime work is offered to the workers.

Details:

- Payroll records for the past 12 working months.
- Time cards for the past 12 working months
- Pay slips for the past 12 working months
- Attendance register
- Worker Interview (10 Workers)

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

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:

Working hours' analysis	
Please include time e.g. hour/week/month <i>(Go back to Key information)</i>	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	Describe: Manual Time card
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
	If "Other", Please define:
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:

F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	Nil	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Nil, No over time work is provided to the workers	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	__0__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Terms and conditions of employment
Overtime Premiums		

<p>M: Are the correct legal overtime premiums paid?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of standard wages: 200%</p>
<p>N: Is overtime paid at a premium?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency: No overtime work is offered to the workers</p>
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other Factories act 1948 and Tamil Nadu Factory rules 1950	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
	<p>As per the Factories act 1948 and Tamil Nadu Factory rules 1950 the overtime to be paid double salary.</p>	
	<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
<p>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 <p>Q1: If yes, please give details:</p>	
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Description of current status:

1. The company has documented their Non-Discriminatory Policy.
2. Laws of the land: Equal Remuneration Act 1976, Factories Act 1948, and Industrial Employment (standing orders) Act 1946. Worker interviews did not raise any area of concern.
3. There are both female and male workers in the organization.
4. The company does not interfere with the right of employees to observe tenets or practices that meet religion, race, national or social origin disability, gender sexual orientation, family responsibilities, caste union membership or political.
5. The company does not allow any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language, and physical contact, in the workplace and, where applicable in residences and other facilities provided by the company for use by personnel.
6. The workers interview clearly established that there is Non-discrimination policy prevalent in the organization. Workers reported they are free to observe religious holidays.
7. Company, in their Manual has defined "No Discrimination" related to age, cast, creed, race, sex, nationality etc. to be considered.
8. The company does not entertain any type of pregnancy or virginity test under any circumstances for any female employee.
9. Anti-discrimination policy is documented & communicated to workers.
10. The Organization has constituted a Internal complaints committee constituted by 04 elected members. Election conducted on 03.07.2020. Committee meets once in two months, Verified the meeting minutes Dated 07.11.2020 and previous to that on 26.09.2020. Mrs. Shyamala baby – NGO from Forum for Womens rights and development, chennai

Details:

Worker interview (10 Workers)

Document review

Management interview

Worker personnel records – Application form, appointment letter, Salary Increment records

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _15_ % A2: Female _85_ %
B: Number of women who are in skilled or technical roles e.g. where specific	05

<p>qualifications are needed i.e. machine engineer / laboratory analyst:</p>	
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: N/A</p>

Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>Health, Hygienic & Safety, Usage of Personal Protective Equipment's, Firefighting, COVID 19 and ETI Base Code.</p>

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If no, please give details:</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>2. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Work performed is on the basis of recognised employment relationship established through national law and practice.

2. The factory signs labour contract with the employees at the time of employment, labour contractor is provided in local language, which workers understand, and workers are provided with copy of contract letters.

3. No home workers /apprentices/student's workers are employed by the facility.

4. Facility does not use 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.

5. 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.

6. Workers do not pay no recruitment fee at any stage of the recruitment process.

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

8. Interviewed workers confirm that have a contract of employment detailing all terms, including their rights and obligations, as well as notice and grievance procedures. The contracts are in in languages understood by them and all workers have a copy of their contract signed by themselves (not a third party) and the

employer. Workers are not asked to sign any blank / unofficial documents. The original contract terms are not replaced or changed without the Worker's knowledge / consent. No extended probationary periods are used to prevent Regular Employment. Workers are not kept on temporary contracts to avoid regular employment or other benefits.

Details:

Worker interview (10 Workers)

Document review

Management interview

Worker personnel records – Application form, appointment letter, Salary Increment records (10 employees)

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

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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Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category (ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category (ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	

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

NON-EMPLOYEE WORKERS

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

	<input type="checkbox"/> Other B1 – If other, please give details:
C: If any checked, give details:	

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	

<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

NA – NO Sub Contracting and Home Working

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:

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

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

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 or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:</p>

B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

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

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

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
 Additional elements:
 9.2 companies should provide access to a confidential grievance mechanism for all workers

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Committees are available and Suggestion boxes are also placed at 2 places. No such violations evidenced.
B: If Yes , are workers aware of these channels and have access? Please give details.	Yes, confirmed during the workers interview
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box and Committees
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details:
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details</p>
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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 has a documented disciplinary practice and follows the laws of the land on this matter (Industrial Disputes Act and the Industrial Employment Standing Orders Act).
- The disciplinary practices are detailed in the Factories Act 1948 and the abstract of the same is displayed
- No Case of any Disciplinary Action taken against any worker the same was verified through the sampled worker interview.
- No deductions for disciplinary purpose are imposed anytime within the facility. Confirmed through worker's interview.
- The Organisation treats all its personnel with dignity and respect. The company does not engage in or Tolerate the use of corporal punishment.
- Facility provide access to a confidential grievance mechanism for all workers and the grievance mechanism include a provision for non-retaliation and does it allow workers to report issues anonymously

Details:
 Policy review
 Worker Interview (10 workers)
 Management interview

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

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

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

1. No immigrant workers employed in the facility.
2. Country's legal system does not permit outside workers to be employed without permit

Details:

Factory walk through
 Document review
 Worker interview (10 Workers)
 Management interview

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

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:

Objective evidence observed:
(where relevant please add photo numbers)

Observation:

<p>Description of observation:</p> <p>Local law or ETI/Additional Elements requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>
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<p>Good examples observed:</p>	
<p>Description of Good Example (GE):</p>	<p>Objective Evidence Observed:</p>

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Verified the Drinking water test certificate done by CVR Labs private Limited Report No: 20110017.16 Dated 06.11.2020 - concluded that the water sample is Physically, chemically and bacteriological potable.
2. verified the Noise level monitoring report done by CVR Labs private Limited Report No: 20110017.19. 07-08 Dated 04.11.2020 - tested at centre of full shoe area and centre of upper section area and it concluded that the noise level is within the permissible Noise level limits is 90Db(A) as per factories act.
3. Verified the Ambient air Quality survey report done by CVR Labs private Limited Report No : 20110017.19.02 and 01 Dated 06.11.2020 , The SPM, SO₂, NO_x, Pb, CO, RSPM, Lead ammonia, Ozone, benzene, Arsenic, nickel, Benzo(A)pyrene - concluded that the above samples complies as per NAAQS limit .
4. verified the Lux level monitoring report done by CVR Labs private Limited Report No: 20110017.19-12 Dated 04.11.2020 - tested at various locations including full shoe- inspection area, full shoe- stitching area, upper section inspection area, upper section stitching area. Lux Level ranges from minimum of 596 at upper section stitching area and 787 at Full shoe inspection area.
5. Verified the Internal Air Quality monitoring report done by CVR Labs private Limited Report No: 20110017.13 and .14 Dated 06.11.2020, Tested for RPM, SPM, SO_x, NO_x, Pb and CO% and concluded that results are within the limits
6. Verified the DG Set stack monitoring for 200 KVA and 45 KVA done by CVR Labs private Limited Report No : 20110017.03 and .04 Dated 06.11.2020 , Tested for SO₂, NO_x, CO, CO₂, O₂ and PM and concluded that the results are within the permissible limits.
- 7.Verified the Sanitary certificate L. DIS. No.4239/E2/2020, dated 08.09.2020, issued by Deputy Director of Health Services Thiruvallur.
- 8.Verified the installation approval of 200 KVA Genset Vide letter No 1451/E1/PON/R32/2020 Dated 04.11/2020. And for 45 KVA Genset Vide letter No 1457/E1/PON/R 32/2020 Dated 04.11.2020, approved by Electrical Inspector, Ponneri Division.

Details:

Any other comments:

Environmental test certificates

Non-compliance:

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

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

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Documents checked & comments:

Verified and found complied with all the Environment Laws

1.Organisation is under the White Category as per the PCB Act ,Hence Air and water consent is not required

2. Mr. V. Aftab Alam – Technical Manager is appointed as the Environmental representative.

3. The Organisation has Environmental policy Dated 02.01.2020 and is displayed in local language in the notice board.

4. The Environmental awareness is conducted to all employees on 24.10.2020

5. verified the Environmental Aspect Impact Analysis- Document No ISPL/ ENV/EAI Issue No: 01 Dated 06.07.2020

Any other comments:
 Environmental Policy
 Environmental Awareness training
 Environmental Aspect impact analysis

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

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

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

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. V. Aftab Alam – Technical Manager
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: verified the Environmental Aspect Impact Analysis ISPL/ ENV/EAI Issue No: 01 Dated 06.07.2020
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, is it publicly available? Verified the Environmental Policy Dated 01.02.2020
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: SOP 1.0 – Environmental Aspects Evaluation Criteria for Environmental Aspects- EVT-TAD Environmental Aspect Impact Analysis ISPL/ ENV/EAI Issue No: 01 Dated 06.07.2020
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not Applicable for this type of industry
H: Have all legally required permits been shown? Please give details.	<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: Not applicable for this type of industry
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: Organisation has formulated Environmental objectives and targets in line with the established policy
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not applicable for this type of industry
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Verified the records of water and power consumption
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not applicable for this facility, No subcontracting agencies or business partners operating in this facility

Usage/Discharge analysis

Criteria	Previous year: Please state period: (Oct 19- Dec 19)	Current Year: Please state period: (Jan 20- Oct 20)
Electricity Usage: <i>Kw/hrs</i>	28086 Units	74774 Units
Renewable Energy Usage: <i>Kw/hrs</i>	Nil	Nil
Gas Usage: <i>Kw/hrs</i>	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 Yes , please state result		
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> • Underground • From Panchayat 	<ul style="list-style-type: none"> • Underground • From Panchayat
Water Volume Used: <i>(m³)</i>	9.5	24.5
Water Discharged: <i>Please list all receiving waters/recipients.</i>	Waster Water <ul style="list-style-type: none"> • 	Waste Water <ul style="list-style-type: none"> •
Water Volume Discharged: <i>(m³)</i>	8.8	22.7
Water Volume Recycled: <i>(m³)</i>	Nil	Nil

Total waste Produced <i>(please state units)</i>	4832 Sq. Feet	6721 Sq. Feet
Total hazardous waste Produced: <i>(please state units)</i>	Nil	Nil
Waste to Recycling: <i>(please state units)</i>	Nil	Nil
Waste to Landfill: <i>(please state units)</i>	Nil	Nil
Waste to other: <i>(please give details and state units)</i>	Nil	Nil
Total Product Produced <i>(please state units)</i>	93073 Sq Feet	136213 Sq Feet

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Verified the Anti Bribery and corruption Policy Dated 01.02.2020
2. Verified the Ethical Business practices policy Dated 01.02.2020
3. Mr. V. Aftab Alam – Technical manager, responsible for implementing standards concerning Business Ethics
4. Anti-bribery policy and Ethical Business practices are displayed in the notice board.
5. Training on Business Ethics was provided to the employees on 30.09.2020
6. Training on Anti bribery & Corruption is provided to the employees engaged in Sales, Purchase, marketing, business development, Administration and logistics, on 30.09.2020

Any other comments:

Anti-Bribery and corruption Policy

Ethical Business Practices Policy

Workers / Staff interview

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

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

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

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<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: Verified the policy dated 01.02.2020 and training to the employees on 30.09.2020</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Verified the records of training dated 30.09.2020</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Policy Dated 01.02.2020</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: communicated to suppliers on 01.05.2019</p>

Other findings

Other Findings Outside the Scope of the Code

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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)

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Appendix 1

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

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

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

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

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p>Environment Section</p>	<p>Environment Section</p>
<p>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.</p>	
<p>Business Practices Section</p>	

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.

		
<p>Facility view from Entrance</p>	<p>Working Hours and Emergency contact Number Display</p>	<p>Temperature checking at entrance</p>
		
<p>Fire Cylinder</p>	<p>First Aid Box</p>	<p>200 KVA Generator</p>

		
<p>Evacuation plan</p>	<p>Smoke detector</p>	<p>Path way marking</p>
		
<p>Leather Store</p>	<p>Cutting Section</p>	<p>Hot Melt Adhesive machine</p>
		
<p>Side arm Machine</p>	<p>Toe Lasting Stitch down</p>	<p>chain stitch sole stitching machine</p>

		
<p>Production floor</p>	<p>Printing Machine</p>	<p>Needle Detector</p>



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

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

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