



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1000762	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1016583	
Business name (Company name):	ACS Textiles Bangladesh Ltd			
Site name:	ACS Textiles Bangladesh Ltd			
Site address:	Tetlabo, Ruppangj, Narayanganj Narayanganj 1461 BD	Country:	BD	
Site contact and job title:	Mr. Md. Ruhul Alam Sharif / General Manager (Compliance)			
Site phone:	+8809606500445	Site e-mail:	rasharifbd@gmail.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-02-20			

Audit Company Name:
Intertek Bangladesh

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)			

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 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Akter Hossain	APSCA Number:	21700574
Additional Auditors:	Nasrin Munny		21703703
	Amin Sharif		21703440
	Md. Imran Khan		32200256
	Hasan Tawhid A Rahim		32200525
	Monoarul Islam		32200615
Date of declaration:	2024-02-20		

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

Site Representation	
Full Name:	Mr. Md. Ruhul Alam Sharif
Title:	General Manager (Compliance)
Date of declaration:	2024-02-20
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
Nil	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1	§1 §2 §3 §4	4	0	0	NC - 48c0e8a9-342a-4ae4-94e2-0bd06ff337f5 NC - db6cedd0-4118-4e7f-8920-ed13bf3ce41 NC - d53069fc-4b29-405a-ae97-a5b9f7cd4290 NC - 2c427c88-af2f-4c1e-8b1f-9ecba03800d9
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid	5.1	§5	1	0	1	NC - cf99346a-4aa0-4546-9b45-29d4a23ca70d GE - 12c2c0e3-cd4b-40f6-bb3c-e2dcc0796061
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Bangladesh Labour Rules 2015, Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Subsection (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.
§2	In accordance with Bangladesh labour law 2006, Section 69 (5) : (5) every gate referred to in subsection (2) or (4) shall be fitted with interlocking or other efficient device to secure that the gate cannot be opened except when the cage is at the landing and that the cage cannot be moved unless the gate is closed.

§3	In accordance with Bangladesh Labor Law 2006, Section 63 (1): In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in a position while the part of machinery required to be fenced are in motion or in use, namely- (a) every moving part of a prime mover, and every fly wheel connected to a prime mover; (b) the head-race and tail-race of every water wheel and water turbine; (c) any part of a stock-bar which projects beyond the head stock of a lathe; and (d) unless they are in such position or of such construction as to be as safe to every person employed in the factory as they would be if they were securely fenced i. every part of an electric generator, a motor or rotary converter; (ii) every part of transmission machinery; and (iii) every dangerous part of any machinery.
§4	In accordance with Bangladesh labor rules 2015 rule 55 (d) A hose reel should be set up in a place approved by the inspector as per the specification of the fire service department on each floor for each 850 sqmt space of each building and there will be the arrangement of uninterrupted water supply in it and it should be tested at least once a year.
§5	In accordance with Bangladesh Labor Act 2006-Section 115: Casual leave. Every worker shall be entitled to casual leave for 10 (ten) days with full wages in a calendar year, and if such leave is not availed for any reason, it shall not be accumulated and the leave of any year shall not be availed in the succeeding year: Provided that nothing in this section shall apply to a worker employed in a tea plantation. In accordance with Bangladesh Labor Act 2006-Section 117 (1a): Annual leave with wages.(1) Every adult worker who has completed 1 (one) year of continuous service in an establishment shall be allowed during the following period of 12 (twelve) months' leave with wages for days calculated on the basis of the works of the preceding 12 (twelve) months at the following rate, namely:(a) 1 (one) day for every 18 (eighteen) days of work, in the case of a shop or commercial or industrial establishment or factory or road transport establishment.

Site Details

Site Details		
Company Name	ACS Textiles Bangladesh Ltd	
Site Name	ACS Textiles Bangladesh Ltd	
GPS location (if available)	GPS Address:	Tetlabo, Tarabo, Rupganj, Narayanganj, Bangladesh
	Coordinates:	Latitude: 23.7549173, Longitude: 90.545968
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License No: 12718/Na.ganj 'L' category, issued by Deputy Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30 June 2024. Fire License No: DD/Dhaka/18607//2004 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30 June 2024. Trade License No: 2020-00432, issued by Tarabo Pourashava which is valid till 30 June 2024.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kind of home textiles item.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	ACS Textiles (Bangladesh) Ltd. started its operation in 2004 which is located at Tetlabo, Tarabo, Rupganj, Narayanganj, Bangladesh. The main product manufactured at this site is all kind of home textiles item. The total land area of the facility is 1,118,554 square feet, total production area is 639,209 square feet, and the total warehouse area is 106,442 square feet. A sister concern facility named ACS Towel Ltd. is present in the same premises of the audited facility under same owner & same management. The audit scope covers only audited facility and common used area. The facility area consists of 15 Buildings. However, Details description is given below:	

Structure and number of buildings	Building Name:		Building # 1 [Accessories Building]-RCC
	Floor	Description	Remark
	Ground	Embroidery Section & Accessories store	None
	1st	Finished goods store	None
	2nd	Wastage store and Prayer room.	None
	3rd	Solar Panel	None
	Building Name:		Building # 2 [Weaving shed unit-1]-pre-fabricated still structure
	Floor	Description	Remark
	Ground	Sizing & Weaving	None
	1st	Cutting Section, Feeding section, Stitching section, Fabrics inspection area, Fabrics folding section, Packing section, Metal free zone.	None
	Building Name:		Building # 3 [Medical Room, Childcare Room, Fire Control Room]-RCC (For Common Use)
	Floor	Description	Remark
	Ground	Medical Center	None
	1st	Childcare Room, Fire Control Room.	None
	Building Name:		Building # 4 [Warping shed]-pre-fabricated still structure
	Floor	Description	Remark
	Ground	Warping section-1, Warping section-2, Twisting & Doubling	None
	1st	Finishing-Folding Section.	None
	Building Name:		Building # 5 [Utility 01]-RCC (For Common Use)
	Floor	Description	Remark
	Ground	Generator, Boiler, Compressor & Sub-station.	None
	1st	Office of Technical Section.	None
	2nd	Cooling Tower	None

Building Name:		Building # 6 [Processing & ETP]-pre-fabricated still structure
Floor	Description	Remark
Ground	Bleaching, Dyeing, Mercerizing, Dyeing Finishing, Color Kitchen, Chemical Sub-store and Printing sections, ETP(Common) etc.	None
Building Name:		Building # 7 [Canteen Building]-pre-fabricated still structure (Common use)
Floor	Description	Remark
Ground	Chemical store, Work shop.	None
1st	General store, Officer's Canteen & Dining Room.	None
2nd	Worker's Canteen.	None
Building Name:		Building # 8 [Staff Dormitory]-RCC (Common)
Floor	Description	Remark
Ground	Higher management Staff dormitory.	None
1st	Higher management Staff dormitory.	None
2nd	Higher management Staff dormitory.	None
Building Name:		Building # 9 [Security Dormitory]-RCC (Common)
Floor	Description	Remark
Ground	Security Dormitory.	None
1st	Security Dormitory.	None
2nd	Security Dormitory.	None
Building Name:		Building # 10 [Washing Unit]-pre-fabricated still structure
Floor	Description	Remark
Ground	Washing unit (Washing and Dryer Machine)	None

Building Name:		Building # 11 [Weaving Unit 04]-RCC
Floor	Description	Remark
Ground	Chemical Store & Quilting Machine room (02 Machines)	None
1st	Fabric Store	None
2nd	Mending.	None
Building Name:		Building # 12 [Weaving Unit 02]-pre-fabricated still structure
Floor	Description	Remark
Ground	Weaving section, sizing section, Warping section-2, Stenter Machine & Raising section.	None
1st	Quilting Section, Cutting Section, Feeding section, Stitching section, Fabrics inspection area, Fabrics folding section, Packing section, Metal free area, Finished goods area	None
Building Name:		Building # 13 [Utility 02]-RCC
Floor	Description	Remark
Ground	Compressor room, Generator room, Office of technical director.	None
Building Name:		Building # 14 [Digital printing & Tufting]-RCC
Floor	Description	Remark
Ground	Digital Printing	None
1st	Tufting	None
2nd	Tufting	None

	Building Name:		Building # 15 [Office Building]-RCC
	Floor	Description	Remark
	Ground	Admin & Compliance, Accounts & finance, Commercial (Export).	None
	1st	Show room & display centre, Marketing, Commercial (Import).	None
	2nd	Sample room & IT Room.	None
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such cracks observed during audit day.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The construction project of the facility has structural engineering evaluation from Tarabo Pourashava, Narayanganj on 31 March 2021. The Layout Plan of the facility was approved by the Department of Inspection for Factories and Establishments, Bangladesh on 25 January 2024.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" 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		
Months of peak season			

<p>Process overview</p>	<p>The main product manufactured at this site is all kind of home textiles item. The Main production process is Warping, Sizing, Weaving, Mending, Dyeing, Printing, Washing, Cutting, Embroidery, Sewing, Finishing, Packing. The number of production line is 28. The monthly production capacity of the facility is 3,000,000 meters. The main machines used by the facility are Benninger Warping m/c, Chaina Warping m/c, Savio Sirius-201A, SSM-CW3-D, Weaving Loom, Reconing m/c, Cutting m/c, Singeing and Desizing Machine, Bleaching Range, Mercerizing, Pad Steam, Printing machine, Sample Printing machine, Digital Printing machine, Stenter machine-1, Sunforizing machine, Thermo sole Dyeing, Curing m/c, Loop Steamer, Calander m/c, Printing & Washing m/c, Coating machine, CRP (Caustic Recovery Plant), Flat Bed Printing, Sample Flat Bed Printing, Thermo Oil Boiler No.1, Streching machine for Flat Bed Screen, End Ring machine, Polymizer, Climatizer, Folding Machine, Rolling Machine, Quilting, Delta, Bobin Winder, Over Lock 4 Thread, Double Feed, Kansai, Barteck, Washing & Dyeing Machine, Hydro Machine, Dryer Machine, 2 Niddle, Thread Trimer, Cloth Cutting, Niddle Detector, New Servo(plain), Over Lock, Button Stitch, Blind Stitch M/C, Picodin M/C, Baratto M/CKansai M/C, Cutting M/C, Thread Trimer, Snap Button, Blind Stitch M/C, Kansai M/C Rapling Zig Zag, Satel Stitch, Overlock M/C Pegasus, Blanket Stitch, Ilet Hole, Ilet, Plain M/C, Overlock-M/C, 2 Niddle M/C etc. And the chemicals used by the facility are J-POVAL Polyvinyl Alcohol Y-type, J Vanol 217, Textile Polymer (PVA)-Polyvinyl Alcohol, Softex (Textile Wax), PLYSTRAN KP, Tapioca Starch, Dropsol TR, Dropfil P10, Oxalic Acid, Soda Ash Light, Sodium Bi Carbonate, Sodium Hydrosulfite, HIDROKSI CLEAN HC 50, Leonil EH Liq, SOLOPOL LDE, ROSHWASH SA, Urea, Resist Salt, Acetic Acid, Sodium Hydroxide-98.5% (Caustic Soda), Hydrogen Peroxide 50%, Bleaching Powder(Local), Samwet BLF, Formic Acid, Ethyl Acetate, Aceton, Dust Adhasive 101, Tubi screen Gold, Tubi screen Silver, TUBIFIX P 70, TUBICOAT BO-W, Liquor Amonia, Seriprint-GT, Seriprint-T, Titanium Di Oxide(Korea), TUBIFIX ML 55, Layoprint RDHT 02, Sodium Alginate, ZAMOPRINT PT 360 E, Printech HV, REPRINT RST- N (Thickener), Eastizol WB Binder 1880, Magnesium Chloride, Umidol APY liq, ROSHSOFT CS, Rotacoat 326 Q Red, ROSHSOFT PS, Velustrol N liq, Fixapret F-ECO liq, Nebula HD Reactive Blue, Nebula HD Reactive Cyan, Nebula HD Reactive Deep Black, Nebula HD Reactive Magenta, Nebula HD Reactive Orange, Nebula HD Reactive Yellow, Drimarine Blue HFCD, NOVACRON® BRILLIANT RED FN-3GL, Novacron Olive Nc, Sunzol G/Yellow GRB, D-hydrd Urea (local), Reactive Blue P3R, Reactive Black PGR, Reactive Turquoise Blue G, Reactive Red-24, Reactive Black FNN, Reactive Megenta HB, Reactive Orange P2R, Reactive Golden Yellow P3R, Reactive Yellow H4G, Reactive Black PGR, Remazol Green 6BT 133%, Sunfix Navy Blue MF-RD, Sunzol Black GN Conc., Pigmaset Blue K-B, Suncion Black P-GR 150%, Suncion Red P-4B, Suncion Turquoise Blue P-GL, Sunfix Orange S2RN, Sunfix Supra Red S3B 150%, Sunfix Navy Blue SPD Conc. Sunfix Navy Blue MF-RD, Sunzol Turquoise Blue G 266%, Suncion Yellow P-6G, Levafix Amber CA-N, Levafix Blue CA, Levafix Fast Red CA, TEXCRON VIOLET MBHB, Texcron Orange PFG, Suncion Turquoise Blue P-GL, Terasil Black W-NS, TERASIL® BLUE W-BLS, TERASIL® GOLDEN YELLOW W-3R, Drimaren Orange PS-2RN g, Suncion Black P-GR 150%, FUCOZOL RED FGB, FUCOZOL BLACK CSG, FUCOZOL NAVY BLUE FGB, FUMOFIX NAVY BLUE FPD, FUMOFIX BLUE P3R, FUMOFIX YELLOW FPD, Pigmaset Blue KBG, Pigmaset Red KBY, Pigmaset Blue KB, Pigmaset Green K-G, Pigmaset Yellow K-3G, Pigmaset Brilliant Pink P3BL, Sodium Chloride (Industrial Salt), Liquid Chlorine,</p>
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	Cellusoft® CR, Dymathik DM-5288, Bactasol HP2E, POWERSOFT® 380, DLQ-1, Wetsoft 700, Katamin BW 3.0, ROSHTEX NC, Samper STB, Sodium Sulphate(Gluber Salt), Zamodye DTP, Zamosperse DL 107E, Terminox® Ultra 50 L, Leucophor BSBB liq, Kieralon XTRA liq c, Wacker SD 97, Optifix EC liq etc.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Elected Participation Committee.
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has living space only for for security and foreign management level employee. Secure personal storage space is provided in living space and it is fit for purpose. Note that living space is not provided to any production workers.
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

Audit Parameters		
Time in and time out	Day 1	
	In	09:01
	Out	17:55
Audit type:	PERIODIC	
Was the audit announced?	SEMI_ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Mr. Md. Ruhul Alam Sharif / General Manager (Compliance)	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	There is no trade union in this facility, and it is not mandated by law. However, the representative of the Participation Committee was present during the opening meeting.		
<i>Reason for absence during the audit</i>	There is no trade union in this facility, and it is not mandated by law. However, the representative of the Participation Committee was present during the audit.		
<i>Reason for absence at the closing meeting</i>	There is no trade union in this facility, and it is not mandated by law. However, the representative of the Participation Committee was present during the closing meeting.		

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	2717	0	0	0	0	0	0	2717
Worker numbers - female	1465	0	0	0	0	0	0	1465
Total	4182	0	0	0	0	0	0	4182
Number of Workers interviewed - male	45	0	0	0	0	0	0	45
Number of Workers interviewed - female	30	0	0	0	0	0	0	30
Total - interviewed sample size	75	0	0	0	0	0	0	75

Nationalities Structure	
Nationality of Management	Bangladeshi
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Bangladeshi approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has no definite peak season.
Worker remuneration	Workers on piece rate: 30%
	Paid hourly: 0%
	Salaried: 70%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: Not Applicable

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	09 groups of 05
Number of individual interviews:	Male: 18 Female: 12
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Facility workplace condition was comfortable. Good relationship with facility management. Wages are paid on time, working condition is hygienic, and management are very supportive and well behaved.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	Very favourable as total working hour is within their limit and overtime is fully voluntary.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
75 workers were selected for interview including 45 males and 30 females. Based on worker interview it was noted that workers were generally positive about their workplace and as per their statement management team was also positive and approachable. All the interviewed workers were assured of confidentiality, and they spoke freely of their views of the facility. Employees said that they were satisfied with their employment at the factory, and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. The facility management treated them with respect. They can complain directly to their supervisors or line manager and also felt free to give their general concerns to the member of Participation Committee who would take it to the next meeting of the Committee.
Attitude of worker's committee/union reps:
Based on the interview with Participation Committee member it was noted that they were positive about the facility practices and looking forward to developing relationships with the management team. Interview was conducted with the member Participation Committee in a separate place. They replied logically regarding their responsibilities, and they also informed that they can easily carryout their daily job without any difficulties. Also, note that vice-president of the participation committee was present during opening and closing meeting.
Attitude of managers:
Facility management showed a positive attitude during the whole audit process. Mr. Md. Ruhul Alam Sharif, General Manager (Compliance), along with his team was present and co-operated throughout the audit process. Facility management respected audit requirements and allowed auditor(s) to take photographs of all production and non-production areas, best practices, and non-conformities. They also provided the photocopy of required documents and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions. The factory management had a system in place to check their current practices against their client's requirements and the local law, and they took notice of the findings of the internal audit team and have a Safety committee to take care of health and safety concerns.

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

0A: Compliance Requirements

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human 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:

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Mr. Md. Ruhul Alam Sharif, General Manager (Compliance).
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.
- The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

Evidence examined:

- Written policies and procedure that being provided individually to employees.
- Facility code of conduct.
- All policies of facility.
- Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

Any other comments:

None

Policy statement that expresses commitment to respect human rights?

Yes No

Please give details:

The facility has a social compliance policy which is a commitment to respect human rights.

Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provides workers manual to the workers where all the policies and applicable govt. law are included.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a designated person who responsible for implementing standards concerning Human Rights. Name: Md. Ruhul Alam Sharif, Job title: General Manager (Compliance).
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility uses worker register and software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 3.5% This year 4.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	4.1%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 2.5% This year 3.0%

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	3.2%	
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All injury recorded in injury register and last injury recorded on 10 February 2024 which was Minor injury to the left hand index finger from roller.	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	1.8%
	This year	1.3%
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)	1.2%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

OB - Management Systems and code Implementation
[Summary of Findings]

OB: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Responsibility for meeting the legal and client code requirements is taken by Mr. Md. Ruhul Alam Sharif, General Manager (Compliance).
- The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- The ETI based code was posted on-site for employee's review.
- The facility had set up policy and pointed one staff to update labour law requirements.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.
- The facility conducts orientation training for all new employees and last orientation training was conducted on 04 February 2024.

Evidence examined:

- Employee handbook.
- All policies of facility.
- Legal license
- Internal audit records.
- Management employee training, training attendance record
- Meeting records.

Any other comments:

None

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: At the last 12 months the site has not been subjected to any fine or prosecution for non-compliance to any regulations.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted through documentation review, facility has policies, and procedure for force labour, child labour, discrimination harassment and abuse.

<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>It was noted through management and worker interview that overtime is voluntary for all employees. No child labour is found in the facility during the facility tour. And age verification certificate found in all the reviewed personal file.</p>
<p>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</p> <p>Please give details:</p> <p>Managers were provided training for forced labour, child labour, discrimination, harassment & abuse though Mid-level Management training. Last training was held on 15 February 2024 with 12 participants.</p>
<p>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</p> <p>Please give details:</p> <p>Training record were found including pictures and attendance sheet.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has BSCI certification which is valid till 29 January 2026. The facility has ISO 9001 certification which is valid till 10 July 2025. And the facility has ISO 14001 certification which is valid till 12 September 2026.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Facility has a dedicated Human Resources department consisting of 40 members and is headed by Mr. Md. Ruhul Alam Sharif, General Manager (Compliance).</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a designated person who responsible for implementing the code. Name: Name: Md. Ruhul Alam Sharif, Job title: General Manager (Compliance).</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has an IT security policy which ensures worker information is confidential.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has an effective key control procedure to keep the information confidential.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility conducts risk assessment which evaluates effectiveness of every policy and procedure department wise. Last risk assessment conducted on 10 January 2024.</p>

<p>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</p> <p>Please give details:</p> <p>The facility has an internal system to raise the issue found in risk assessment and to implement the way of reducing it.</p>
<p>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</p> <p>Please give details:</p> <p>Facility has a supplier selection policy which ensures labour standard of its own supplier.</p>
<p>Land Rights</p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has all the required licenses and permissions as per legal requirements.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not Applicable</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has ownership of the building maintaining all legal procedure and no expansion was conducted.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No illegal appropriation of land for facility building or expansion of footprint.</p>

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility has a policy which prohibits forced labour, and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employee interview.

Evidence examined:

- Facility policy and procedure
- Sample employee personal files.
- Service book
- Employee handbook
- Time record

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has a policy mentioning Workers are free to terminate employment from the facility.

<p>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?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The facility has yearly production turnover 64 million USD and facility has not published modern day slavery statement.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No there is no such restriction.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Facility has established forced labour and bonded labour policy; even though they have no such type of labour.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.</p>

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

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union in the facility but there is a Participation Committee formed by election process on 15 November 2022.
- Regular meeting of Participation Committee is held, last meeting was held on 13 January 2024.
- Meeting minutes are posted in notice board and recorded in a register.
- Total Participation committee member is 24 where 19 members from worker side and 05 from management side.
- Members of Participation Committee are not treated less favourably than other workers.
- Members of Participation Committee are allowed to carry out their duties within working hours without affecting their pay.

Evidence examined:

- Freedom of association policy review.
- Participation committee formation records
- Participation committee member list
- Participation committee meeting register
- Participation committee meeting minutes
- Participation committee meeting attendance register.

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union	<input checked="" type="checkbox"/> Worker Committee
	<input type="checkbox"/> Other	<input type="checkbox"/> None
Other details:	Elected Participation Committee.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through Welfare Officer or complain box. Moreover, facility has formed Safety Committee on 07 April 2022. The safety committee consists of 12 members where 06 are from employee side. Last meeting held on 28 January 2024.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has a policy regarding Freedom of Association. Regular Participation Committee meeting is held, and meeting minutes are posted on notice board.
Name of union and union representative, if applicable:	Not applicable
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation committee consist of 24 members (19 members on behalf of employees and 05 members from management side)
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Participation committee members name with picture are posted in the notice board.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-11-15
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	3.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Participation committee meeting held in every month. Last meeting held on 13 January 2024 and meeting topic was as below: 1. Discussion on exhaust fan in toilet 2. Discussion on broken tiles in production floor
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. General Health and Safety management

- Mr. Md. Abu Solayman- AGM (Compliance) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and last test was done by Department of Public Health Engineering (DPHE) on 26 October 2023.
- Tested parameters were pH, TDS, Iron, Arsenic, Total coliform etc. where all the parameters were within acceptable limit as per ECR 2023 and WHO guideline for drinking water.
- Sufficient clean toilets segregated by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that Safety committee meeting held once every three months.

2. Fire Safety

- There are 02 or more exit in each room which were open throughout the working hour.
- Assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up to date. Facility checked all fire equipment schedules wise. Fire equipment last checking was done on 12 February 2024.
- The facility management posted the evacuation plans on every production floors/shed with local language.
- Public Address system and fire hose found active throughout the facility.
- Facility installed addressable smoke detection system in the production building.
- Facility has an emergency response team of 1024 members where all members are trained.
- The facility conducts internal and external fire drill regularly. Last internal day time fire drill was conducted on 29 January 2024. The duration of the fire drill was 2 minutes 25 Seconds which was monitored by Fire Safety Officer. Total 962 employees were present in this drill. Last internal night time fire drill was conducted on 28 January 2024. The duration of the fire drill was 02 minutes which was monitored by Fire safety officer. Total 181 employees were present in this drill. Last external day time fire drill was conducted on 17 December 2023. The duration of the fire drill was 02 minutes 05 seconds which was monitored by Fire service and Civil Defense. Total 835 employees were present in this drill.
- The facility has adequate fire-fighting equipment such as Fire extinguisher, Fire Hose, Fire Alarm Switch, Fire sounder, Smoke Detector, Heat Detector, Fire Door, Lock Cutter, Helmet, Gum Boot, Stretcher, Gas Mask, Blanket, Hand Gloves etc.

3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 40 certified electrician who check and do inspection for whole facility.
- Facility checks all electric channels, distribution board and electric connection as required. The last inspection record of some equipment are given below,
 - Last inspection date of Panel Board is 11 February 2024, done by Engineer.
 - Last maintenance date of Machine is 19 February 2023, done by Mechanical Officer.
 - Last inspection date of Boiler is 30 January 2024, done by Boiler In-charge.
 - Last inspection date of Compressor is 23 January 2024, done by Engineer.
 - Last inspection date of Generator 01 February 2024, done by AGM (Power Plant).

4. Medical services:

- There were 36 first aid boxes with sufficient kits in the full facility.
- There were 339 internal first aider.
- Facility has appointed 03 Doctors who sits in the facility six days in a week, including 05 nurse, and 06 Medical Assistant.
- They also arranged first aid training with first aider.
- In the medical room they have 08 beds where 05 beds for male and 03 beds for females.

5. Dormitory:

- Facility provides living space or rest room for security and management employee.

6. Training

The facility provides below training to the employees. The last training records are given below.

- Last Orientation Training to factory rules was arranged on 04 February 2024 with 19 participants, trained by Welfare Officer.
- Last Mid-level management Training was arranged on 15 February 2024 with 12 participants, trained by the AGM - Compliance).
- Last Fire Fighting Training (internal) was arranged on 19 February 2024 with 09 participants, trained by Fire safety officer.
- Last Fire Fighting Training (External) was arranged on 27 & 28 January 2024 with 40 participants, trained by Fire Safety and Civil Defense (FSCD).
- Last PPE Training was arranged on 14 February 2024 with 20 participants, trained by Compliance officer.

- Last First aid Training was arranged on 13 February 2024 with 11 participants, trained by medical officer.
- Last Health & Safety Training was arranged on 17 February 2024 with 24 participants, trained by Assistant Manager- Compliance.
- Last training on anti-harassment was arranged on 13 February 2024 with 22 participants, trained by Welfare Officer.
- Last training on Wastage management was arranged on 11 February 2024 with 14 participants, trained by Assistant Manager- Compliance.
- Last training on Chemical handling was arranged on 04 January 2024 with 09 participants, trained by Assistant Manager- Compliance.
- Last training on Environmental awareness was arranged on 31 January 2024 with 15 participants, trained by Assistant Manager- Compliance.

7. Reports

The facility tests their air, noise and drinking water quality from third party. The last test records are given below:

- Last Drinking water was tested from Department of Public Health Engineering (DPHE) on 26 October 2023.
- Last Air, Light, Stack air emission, Noise test were conducted by Qtex Solution Ltd. on 06 September 2023.
- Last waste water was conducted on 02 February 2024 by DoE.
- Environmental impact assessment was conducted in September 2023.

Evidence examined:

- License review
- Building approval plan
- Group insurance
- Water test report
- Air, light, noise, stack emission test report, GHG Emission, and EIA.
- Injury record and analysis report
- Machine and electric maintenance record
- Risk assessment report
- Training records
- Safety committee record
- Electric installation checking record
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Accident reports
- Chemical list and MSDS for each chemical
- Health and safety policy
- Potable water testing certificates

Any other comments:

None

<p>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</p> <p>Please give details:</p> <p>The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility provides workers manual to the workers where all the policies and applicable govt. law are included.</p>




<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No additional structures were found with building construction approval.</p>
<p>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</p> <p>Please give details:</p> <p>All the visitors to the site are informed on H&S and provided with personal protective equipment where necessary.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has medical facility for the employees. Equipment's are provided as per legal requirements.</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has 03 Doctors, 05 nurse, and 06 medical assistants for the treatment of the employees. Separate bed for male and female are also available in the medical room.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility provide transportation to workers free of cost. The facility has agreement with Fatema enterprise, located at Rupganj, Narayanjanj, for providing three buses. All the bus has valid fitness certificates, permits and the drivers have valid driving license from Bangladesh Road Transport Authority.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has living space only for for security and foreign management level employee. Secure personal storage space is provided in living space and it is fit for purpose. Note that living space is not provided to any production workers.</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility conducts risk assessment for their people to reduce identified risk. last risk assessment conduct on 10 January 2024.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.</p>

Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?


Yes No



Please give details:

The facility does not use banned chemicals and follows all the customer and legal requirement on environmental standard.


Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	48c0e8a9-342a-4ae4-94e2-0bd06ff337f5	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring.	
Local law issue	In accordance with Bangladesh Labour Rules 2015, Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Subsection (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.	 <p>Loading unloading employees not wearing safety shoes.png</p>
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	 <p>Employees not using ear plug.jpg</p>
Explanation to the non compliance	It was noted from facility tour, employees and management interview that employees were not using relevant PPE (Personal Protective Equipment) as follows: a. Randomly checked 03 out of 08 employees were not using relevant PPE ear plug while working in the Weaving and Twisting section located on the ground floor of building- 02 & building- 04. b. Randomly checked 02 out of 02 maintenance employees were not wearing safety helmets or safety belts while working at height located at building- 06. c. Randomly checked 05 out of 20 employees were not using ear plugs at Tufting section on the 2nd and 1st floor of building- 14. d. Randomly checked 06 out of 14 employees were not using relevant PPE head scarf while working in Weaving section located at ground floor of building-	 <p>Employees not using head scarf.jpg</p>

	02. e) Randomly checked 4 out of 10 employees engaged in loading and unloading heavy beams on the facility premises were not wearing proper safety shoes.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should provide awareness training regarding proper usage of PPE for the mentioned employees.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	db6cedd0-4118-4e7f-8920-ed13fbf3ce41	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	274 - Proper safeguards not used to prohibit unauthorised access/use of dangerous machinery (e.g. panels left open / keys left in forklift etc.)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring.	
Local law issue	In accordance with Bangladesh labour law 2006, Section 69 (5) : (5) every gate referred to in subsection (2) or (4) shall be fitted with interlocking or other efficient device to secure that the gate cannot be opened except when the cage is at the landing and that the cage cannot be moved unless the gate is closed.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted through the facility visit that randomly checked 2 (two) cargo lifts found inside the facility premises with interlocked gates, but the interlocks were found non-functional at the time of the audit.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should ensure interlocks on all lifts/hoists as per the law.	
		 Non-functional interlocks of cargo lift.jpg

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	d53069fc-4b29-405a-ae97-a5b9f7cd4290	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring.	
Local law issue	In accordance with Bangladesh Labor Law 2006, Section 63 (1): In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in a position while the part of machinery required to be fenced are in motion or in use, namely- (a) every moving part of a prime mover, and every fly wheel connected to a prime mover; (b) the head-race and tail-race of every water wheel and water turbine; (c) any part of a stock-bar which projects beyond the head stock of a lathe; and (d) unless they are in such position or of such construction as to be as safe to every person employed in the factory as they would be if they were securely fenced i. every part of an electric generator, a motor or rotary converter; (ii) every part of transmission machinery; and (iii) every dangerous part of any machinery.	 No locking mechanism for platform ladder.jpg
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	 No working alarms or indicators for forklift.jpg
Explanation to the non compliance	It was noted through the facility visit that the following cases of lack of appropriate safeguards were found: a) One platform ladder where two employees were working for maintenance did not have a locking mechanism on any of the 4 wheels. b) One randomly checked forklift did not have any working alarms/indicators.	
Follow up	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

method		
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should ensure appropriate safeguards for the mentioned equipment/machinery.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	2c427c88-af2f-4c1e-8b1f-9ecba03800d9	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	189 - Inadequate hose reel installation and maintenance	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring.	
Local law issue	In accordance with Bangladesh labor rules 2015 rule 55 (d) A hose reel should be set up in a place approved by the inspector as per the specification of the fire service department on each floor for each 850 sqmt space of each building and there will be the arrangement of uninterrupted water supply in it and it should be tested at least once a year.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted from the facility tour that, water dispensing nozzle found missing at 11 of 12 fire hoses on the ground, 1st and 2nd floor of building- 11, and 02 of 02 at building- 13.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should take the necessary action for all mentioned fire hoses.	
		 <p><u>Fire hose without nozzle.JPG</u></p>

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

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctors.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photocopied national identification card and other documents.
- There was no child or young employee observed in the facility.

Evidence examined:

- Recruitment policy.
- Policy on No-Child labour.
- Personal file including Birth certificate, primary/secondary education certificate, National ID card etc. of sample employees.
- Age verification documents.

Any other comments:

None

Legal age of employment:	14
Age of youngest worker found:	19
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
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as the facility does not have any workers under the age of 18 years.

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility is providing local legal minimum wage for all the employees. All workforce earning above minimum wage.
- Time keeping systems is Face Detection.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Benefits are paid such as festival bonus, maternity benefit to appropriate workers.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- All employees were paid within 07 working days after completion of each month through Bank Transfer.
- Each employee was given a pay slip.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- Salary sheet and timecard review: January 2024 (Current paid month), October 2023 (Random paid month), July 2023 (Random paid month).

Evidence examined:

- Salary sheet review
- Overtime payment record review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review

Any other comments:

None

Summary Information

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

Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: null Per Week: null Per Month: null	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 5710	Actual Per Day: null Per Week: null Per Month: 7464	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: null Per Week: null Per Month: null	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	75 samples from the month of January 2024 (Current paid month), October 2023 (Random paid month), and July 2023 (Random paid month).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The minimum wage is BDT 5710/ for the cotton textile industrial sector in Bangladesh. Minimum wage gazette published on 03 May 2018, SRO Number 116-Law/2016 (RMG Sector): Minimum wage of Grade 1: 8977 BDT, Grade 2: 8275 BDT, Grade 3: 7924 BDT, Grade 4: 7303 BDT, Grade 5: 7033 BDT, Grade 6: 6763 BDT, Grade 7: 6520 BDT, Grade 8: 6250 BDT, Grade 9: 6061, Grade 10: 5710 BDT.		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Lowest monthly gross salary was found 7464 BDT from sample employees. All workforce earning above minimum wage.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:• Facility provides festival bonus as per legal requirement. • Facility provides attendance bonus to all employees as per company policy. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	• As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. • As per Bangladesh Finance Act 2022 factory may deduct BDT 20 for Government Revenue Stamp.		

Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Deduction is made for un-authorized absent
Please list all deductions that have not been made.	1. Housing facility 2. Revenue Stamp 3. Income tax 4. Loans Facility does not deduct the above as they are not required.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility shows all real records which reflect all scenarios.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other - please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the legal requirement facility provides yearly increment on basic wage.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through payroll records review and employees' interviews, it was confirmed that equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	cf99346a-4aa0-4546-9b45-29d4a23ca70d	
Clause	5 - Living Wages are Paid	
Issue Title	420 - Failure to pay legally required leave entitlements (e.g. annual, maternity, paternity, sick leave) correctly - systemic	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness & monitoring.	
Local law issue	<p>In accordance with Bangladesh Labor Act 2006-Section 115: Casual leave. Every worker shall be entitled to casual leave for 10 (ten) days with full wages in a calendar year, and if such leave is not availed for any reason, it shall not be accumulated and the leave of any year shall not be availed in the succeeding year: Provided that nothing in this section shall apply to a worker employed in a tea plantation. In accordance with Bangladesh Labor Act 2006-Section 117 (1a): Annual leave with wages.(1) Every adult worker who has completed 1 (one) year of continuous service in an establishment shall be allowed during the following period of 12 (twelve) months' leave with wages for days calculated on the basis of the works of the preceding 12 (twelve) months at the following rate, namely:(a) 1 (one) day for every 18 (eighteen) days of work, in the case of a shop or commercial or industrial establishment or factory or road transport establishment.</p>	
ETI code	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.	
Explanation to the non compliance	It was noted from employees leave records application review, management and employees that, 15 employees leave applications were reviewed randomly where 10 of those employees applied for casual leave due to familial issues, but the facility management approved/considered these leave as earned leave instead of casual leave for these employees. Note that as per records review and	

	employees' interview, at least 5-10 days un-availed casual leave were found remain balance for these employees.	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that all employees' leave should be granted or considered as per local law.	

Good Example	Evidence																		
[Back to findings summary]																			
<table border="1" style="width: 100%;"> <thead> <tr> <th colspan="2" style="text-align: center;">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>12c2c0e3-cd4b-40f6-bb3c-e2dcc0796061</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>The facility is providing free schooling for its staffs and worker's children. The facility continues to pay employees last month gross salary in every month for the lifetime to the employees' nominee if employee dies when serving in this company. The facility is providing transportation for its all employees free of cost. The facility is providing Iftar (food for breaking fast) at Ramadan time for all employees present during iftar time.</td> </tr> <tr> <td>Evidence</td> <td>Documents review, management & employees' interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	12c2c0e3-cd4b-40f6-bb3c-e2dcc0796061	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	The facility is providing free schooling for its staffs and worker's children. The facility continues to pay employees last month gross salary in every month for the lifetime to the employees' nominee if employee dies when serving in this company. The facility is providing transportation for its all employees free of cost. The facility is providing Iftar (food for breaking fast) at Ramadan time for all employees present during iftar time.	Evidence	Documents review, management & employees' interview.
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New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																		
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Evidence	Documents review, management & employees' interview.																		

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

6: Compliance Requirements

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current Systems:

- In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either.
- Through employees' interview it was noted that, overtime is voluntary.
- Time keeping systems is Face Detection.
- All overtime is compensated at a premium rate for all employees.
- Facility provides 1 rest day in every week.

Evidence examined:

- Employees' interviews
- Management interview
- Facility policy on working hours
- Salary sheet
- Payslip
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours

Any other comments:

None

Working hours' analysis

Systems & Processes

What timekeeping systems are used? Face Detection

Is sample size same as in wages section? Yes No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	No overtime hours observed in the sample months of January 2024 (Current paid month), October 2023 (Random paid month), and July 2023 (Random paid month).
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The highest combined working hour was found 48 hours per week.
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime. However, no overtime was observed in the sample months.
Overtime premium	

<p>Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p> <p>Please give details: Based on policy review, and employee interview the Overtime is paid at a premium as per legal requirement (200% of standard wage). However no overtime was observed in the sample months.</p>
<p>Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Based on policy review, and employee interview the Overtime is paid at a premium as per legal requirement. However no overtime was observed in the sample months.</p>
<p>If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements</p> <p><input checked="" type="checkbox"/> Other</p>
<p>Please give details</p>	<p>Not applicable</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. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<p><input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)</p>
<p>Please give details</p>	<p>Not Applicable as the highest weekly working hour was found 48 hours.</p>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>Not applicable</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

Evidence examined:

- Policy of Anti-Discrimination.
- Recruitment policy.
- Training record.
- Termination records.
- Female employee rights

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 90.0%	Female: 10.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	No such women working in the facility.	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	No such evidence found	
Professional Development		
What type of training and development are available for workers?	<ul style="list-style-type: none"> • Orientation Training • Fire Fighting Training • First Aid Training • PPE Training • Health & Safety Training • MSDS/ Chemical Handling training • Environment related training 	

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)

Yes No

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All employees are getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees.

Evidence examined:

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.

Any other comments:

None

Responsible Recruitment

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- | | |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions | |

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- Yes No

Migrant Workers	
Type of work undertaken by migrant workers:	Not Applicable as there is no migrant worker in the facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable as there is no migrant worker in the facility.
Is there any observation on this finding?	None
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable as there was no agency worker in the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. There were no migrant agency workers in the facility.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable, site does not use agencies.
Contractors (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.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Site does not have any contractors on site.

Do all contractor workers understand their terms of employment?

Yes No

Please give details:

Not applicable. There are no workers supplied by contractors in the facility.

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

8A: Compliance Requirements

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

Current 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:

- No sub-contracting and homeworking were used by this facility.
- All workers getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all workers.

Evidence examined:

- Shipment record.
- Goods in and out register.
- Production record.
- Goods in and out gate pass / records.

Any other comments:

None

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? Yes No

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

<p>Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p>
<p>Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p>
<p>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>Please give details:</p>

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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Only employees with a legal right to work shall be employed or used by the facility.
- The age of the youngest worker was found 19 years.

Evidence examined:

- Factory recruitment policy.
- Employees personal file.

Any other comments:

None

10B4 - Environment 4–Pillar
[Summary of Findings]

10B4: Compliance Requirements

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

10.B4.2 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.

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

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

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

10.B4.6 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).

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

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

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

10B4: Guidance for Observations

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

10.B4.11 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:

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
- The facility also provides awareness training to all related personnel.
- The facility has an agreement with DKMC Hospital Ltd. located at Rupganj, Narayanganj, for emergency treatment of the employees and medical waste disposal which is valid till 09 March 2025.
- The facility has Wastage agreement with four third party for collecting and disposal solid wastage.
- Air emission and Noise level test was conducted by the facility and all the parameter of those report was found within the acceptable limit.
- The facility conducted EIA in September 2023.

Evidence examined:

- Facility environment policy and procedure
- Environment management system documents
- Air and noise test report, EIA, and GHG Emission Inventory.
- Water and energy consumption register
- Wastage register
- Water and energy consumption register
- Contract for wastage disposal

Any other comments:

None

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	The facility has a responsible person for environmental issues. The responsible person is Md Md. Abu Solayman- AGM (Compliance).
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 Please give details: The site has conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks. The facility also conducted environmental impact assessment (EIA) in September 2023.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has ISO 14001 which is valid till 12 September 2026.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Facility has an environmental policy to reduce negative environmental impact. The policy also addresses the proper waste management. The policy addresses the key impacts from their operations and their commitment to improvement.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None Observed
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has all legally required permits. The facility have all permit to use energy and water. The facility has also valid environmental clearance certificate (ECC) from Department of Environment.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Facility keep the records of hazardous chemicals used in their manufacturing process. Facility has a chemical inventory covering for all the chemicals used in the facility.
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 Please give details: There are system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.

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 Please give details: The facility has a reduction target for Energy Consumption, Water Consumption, Wastage, up to year of 2024.
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provides yarn and fabric waste to third party for recycling and monitor the amount of waste that is recycled. Total 816708 kg was recycled in 2023.
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 Please give details: Facility has a measuring system to monitor the water and, energy consumption. Facility has meters to accurately measure and monitor energy consumption, and water consumption.
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 Please give details: Not Applicable. No Sub-Contracting agencies or business partners operating on the premises.

Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	134425	12170
Renewable Energy Usage: Kw/hrs	6627	233
Gas Energy Usage: Kw/hrs	11641265	2483174
Has site completed any carbon Footprint Analysis?	Yes	Yes
If Yes, please state result	59723528.55 kg CO2	4999091.45 kg CO2
Water Sources	Ground Water	Ground Water
Water Volume Used	904669	74696
Water Discharged	Nearby waterbody	Nearby waterbody
Water Volume Discharged	850492	70762
Water Volume Recycled	0	0
Total waste produced	1359554.05 kg	103296 kg
Total hazardous waste produced	138414 kg	12248 kg
Waste to recycling	816708 kg	56830 kg
Waste to landfill	0	0
Waste to other	1359554.05 kg Handed over to third party	103296 kg Handed over to third party
Total Product Produced	31128269 meters	2262120 meters

10C - Business Ethics – 4-Pillar Audit
[Summary of Findings]

10C: Compliance Requirements

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
 - 10.C.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.
 - 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
 - 10.C.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.
 - 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
 - 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
 - 10.C.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**
- 10.C.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.
 - 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current Systems:

- The integrity policy of Intertek was given to the facility prior to start the audit. The management acknowledged this, signed it and kept a photocopy.
- The company manual contains the details of Business Ethics; moreover, they have anti-bribery and anti-corruption policy. The Business integrity policy was established and communicated to all employees by company manual, employee handbook and orientation and regular training.
- Based on facility's management interview, the facility was familiar on local regulations/laws concerning business integrity standards.
- Mr. Md. Ruhul Alam Sharif, General Manager (Compliance) is the responsible person for business integrity.
- The employees have their orientation training on business ethics when they first start their job. The Admin and Compliance department determines all job roles and responsibility categorized by section.

Evidence examined:

- The company business ethics policy including bribery, corruption
- Training records

Any other comments:

None

<p>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 type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: Facility has business ethics policy and the policy communicated internally & externally.</p>
<p>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: The site gives training to relevant personnel on business ethics issues.</p>
<p>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: The policy gets updated on a regular basis.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: The site does not require third parties including suppliers to complete their own business ethics training.</p>

Attachments



Facility main gate.JPG



Security check room.JPG



Facility Name Plate.JPG



Facility building.JPG



Assembly point.JPG



Chemical Store.JPG



Accessories Store.JPG



Gray fabric store.JPG



Finished goods Store.JPG



Tufting Section.JPG



Drying section.JPG



Finishing Section.JPG



Weaving Section.JPG



Quilting Section.JPG



Finishing Folding Section.JPG



Spot removing section.JPG



Packing Section.JPG



Embroidery Section.JPG



Dyeing Section.JPG



Washing section.JPG



Warping Section.JPG



Sewing section.JPG



Ironing Section.JPG



Cutting section.JPG



Sizing Section.JPG



Twisting Section.JPG



Aisles Mark.JPG



ETP area.JPG



Fire control panel.JPG



Fire alarm switch.JPG



Toilet Area.JPG



Fire pump room.JPG



Grievance box.JPG



Medical room.JPG



Illuminated exit sign.JPG



Fog Light.JPG



Hose Reel Check.JPG



Fire alarm.JPG



First aider.JPG



Childcare room.JPG



No Smoking Sign.JPG



Notice board.JPG



Dining area.JPG



Staircase.JPG



Fire rescuer.JPG



Policy board.JPG



Electric distribution board.JPG



Electric sub-station.JPG



Boiler room.JPG



Fire fighter.JPG



Fire hose cabinet.JPG



Fire Extinguisher.JPG



Public Address System.JPG



First aid Box.JPG



Generator room.JPG



Evacuation plan.JPG



Time recording system..JPG



Smoke detector.JPG



Firefighting equipment.JPG



Compressor room.JPG



Eye Wash station.JPG



Canteen.JPG



Fire Exit Door.JPG



Drinking water station.JPG



Waste keeping area.JPG



NC Photo-No working alarms or indicators for forklift.jpg



NC Photo-Non-functional interlocks of cargo lift.jpg



NC Photo-Employees not using ear plug.jpg



NC Photo-Loading unloading employees not wearing safety shoes.png



NC Photo-No locking mechanism for platform ladder.jpg



NC Photo-Employees not using head scarf.jpg



NC Photo-Fire hose without nozzle.JPG



Security Dormitory.jpg



Signed CAPR.pdf



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

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

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