




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 402644017	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 419907875
Business name (Company name):	Handz Clothing BD Limited		
Site name:	Handz Clothing BD Limited		
Site address: <i>(Please include full address)</i>	433/1, Nanduain, Masterbari, Gazipur Sadar, Gazipur	Country:	Bangladesh
Site contact and job title:	Yasin Islam Mondol (Asst. manager-HR & Compliance)		
Site phone:	+8801615110963	Site e-mail:	Hrd.handz@gmail.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	23 June, 2022		

<p>Audit Company Name & Logo:</p>  <p>GSCS International Ltd.</p>	<p>Report Owner (payer):</p> <p>Handz Clothing BD Limited</p>
---	--

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

 - 2-Pillar SMETA Audit
 - ETI Base Code
 - SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,
 - 4-Pillar SMETA
 - 2-Pillar requirements plus
 - Additional Pillar assessment of Environment
 - Additional Pillar assessment of Business Ethics
 - The Customer's Supplier Code (Appendix 1)
- (3)** Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4)** Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

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

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

Lead auditor: Aniruddha Paul (RA 21702514)

Lead auditor APSCA status: In Good Standard

Team auditor: Md. Shehab Uddin Sajeeb (ASCA 21705359)

Interviewers: Aniruddha Paul and Md. Shehab Uddin Sajeeb

Report writer: Aniruddha Paul

Report reviewer: Md. Anisur Rahman

Date of declaration: June 23rd, 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	None Observed
0B Management systems and code implementation		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	03	02	0	<p>Summary of Non- Compliances:</p> <p>1. Workers were not aware of the ETI code of conduct. Note that facility arranged the training on ETI code of conduct but which is not well effective to the workers.</p> <p>2. It was noted through documents review and management interview facility did not have permission for the generators. The facility had 2 diesel generators with (250+120) = 370KW capacity.</p> <p>3. i) The facility divided into 2 units and established in two premises within 250m away. In unit-1 there were 4 single storied sheds. However, in approved building construction plan fabric store and generator shed, knitting shed and wastage store shed was not included. ii) Factory extended 1st floor on the RMS building in unit-2 where there is an office. However, in approved factory layout plan this extended 1st floor was not included.</p>

									<p>Summary of Observations:</p> <p>1. It was noted that the SAQ was not completed. The factory management explained that they had not been aware how to fill up the SAQ. However, they started this work, and would finalise the SAQ within the next month.</p> <p>2. 01 out of 01 boiler operators' competency certificates were expired as per The Boiler Act 2022 published on April 11th, 2022 and as per the act the boiler operators' competency certificates should be validated for 5 years.</p>
1.	<u>Freely chosen Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
2	<u>Freedom of Association</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
3	<u>Safety and Hygienic Conditions</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	07	0	0	<p>Summary of Non- Compliances:</p> <p>1. The factory did not install the interconnected fire alarming and smoke detection system in the building. Note that only manual smoke detectors and fire alarming system are present in the production area.</p> <p>2. In unit-1 fabric store and generator shed, knitting shed and wastage store shed was not covered by the fire license. Note that facility management applied to include the mentioned area in the fire license.</p> <p>3. In medical room bellow required elements found missing: i) wheel chair ii) 2 buckets or pots with closely-fitted lids iii) 1 kettle for boiling water</p>

									<ul style="list-style-type: none"> iv) 6 woolen blankets v) 6 hand towels vi) 1 bottle of 1:20 carbolic lotion vii) Tetanus serum viii) 4 trays ix) Sterilizer <p>4. 3 out of 3 first aid boxes found with below missing elements:</p> <ul style="list-style-type: none"> i) 1 copy of leaflet regarding primary aid ii) analgesic and antacid type of tablets iii) ointments for eyes iv) first aid register v) 3 packs of edible saline vi) 3 large sized sterile bandages <p>5. Facility did not conduct night fire drill as the knitting section operated in day and night shift (08:00 PM to 05:00 AM)</p> <p>6. In dining and canteen room seating capacity was not adequate in line with law. Note that the facility had 47 seating capacity. However, in accordance to 450 workers facility had to provide 135 seating capacity in the dining and canteen room.</p> <p>7. Registration number plate was not posted on the boiler.</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	01	Summary of Good example:

									The factory provides monthly attendance bonus BDT 400 to the helpers and BDT 600 to the operators as per factory policy.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	None Observed
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	0	0	Summary of Non- Compliance: 1. Facility management did not provide leave book to the workers. However, facility management maintain leave register in software.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	None Observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	0	0	Summary of Non- Compliance: 1. The test result of air emission, noise level, light, temperature was expired on June 1st, 2022.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not Applicable as it is 2- Pillar Audit
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not Applicable as it is 2- Pillar Audit

General observations and summary of the site:

Handz Clothing BD Limited is located at 433/1, Nanduain, Masterbari, Gazipur Sadar-1700, Gazipur, Bangladesh. The Site was established in the year of 2017. This initial audit was conducted by two auditors and they assessed the factory operation against ETI base code and local law requirements on a sampling basis in one day. The scope of this audit was based on 2-Pillar SMETA systems.

The factory specialized in manufacturing all kinds of knit items. The main production process is Knitting, Cutting, Sewing, Finishing & Packing. The total factory area was 45,800 square feet and the production area was 42,000 square feet. The factory has no obvious peak/ off-peak season. Production capacity is around 7,80,000 Pcs per month.

In view of facilities, the factory is established in 03 buildings & 04 different Sheds.

The total manpower of the Factory is 450. On the day of audit, there were 410 workers (Male-164 & Female- 246) in the factory. Among them 425 were production workers and 25 were non-production workers. All workers were local. The weekend of the factory was Friday. The general working hours for all sections were running in one shift from 08:00 to 17:00 including a one-hour lunch break from 13:00 to 14:00. And knitting section running in two shifts 8:00 hours to 17:00 hours and 20:00 hours to 5:00 hours including 01 hour lunch/diner break. Only, security personnel were doing three shifts per eight hours in each with rostering schedule off-break & weekends.

Overview of opening meeting, facility management responses:

Auditors entered the facility at 09:35 on June 23rd, 2022 and conducted an opening meeting with facility management as per the ETI Base Code, SMETA audit procedure and requirements. During the opening meeting, **the Workers' representative** was present along with the factory management and they assured full co-operation with this audit.

Based on documents review, employees' interview and site tour, the positive and negative findings are as follows:

1. The factory provided company registration no. C- 110871/13 with lifetime validity started from August 21st 2013.
2. All employees were recruited directly by the factory. The employees were provided a copy of their personal ID cards, birth certificate, and educational certificate (if any) and characterize certificate to the factory before starting their work. Both copies of ID cards, birth certificate, educational certificates, character certificate and latest individual photos were kept properly in their personnel files.
3. The emergency evacuation floor plan was posted on the wall of each floor.
4. No child labour or young worker was found during the audit.
5. Neither migrant workers nor agency workers were found in the facility.
6. No forced labour, discrimination & harsh or inhumane treatment were found during the audit.
7. Suggestion boxes were hung at the concealed part of the facility for workers to complain or give feedback on their working condition and grievances. Also, they could communicate with their supervisors and top management directly and through worker representatives.
8. Total 26 workers: Six (06) individual workers and twenty (20) four groups of five workers were interviewed **in the confidential room**. Employees' attitude was positive and polite during the audit. And employees showed a favourable attitude toward the factory via worker interviews. Note: Although nowadays Covid-19 pandemic situation has been reduced all over the world. Moreover, we had to manage our activities by maintaining safety when we conducted workers interview, facility visit and other auditing activities maintaining social distance. We also observed that the following measure has been taken by the site while starting the operation in every day to prevent their employees from Covid-19:

- Ensuring facemask for each employee.
- Ensuring facemask and safety precautions for visitors.
- Arranging a hand-washing facility for all employees while entering the factory.
- Facility has posted awareness posters of Covid-19.
- Having a reporting system to medical person or management if a suspected case is observed.
- Facility has taken different steps for creating awareness for covid-19

9. Fire-fighting facilities were well equipped.

10. Drinking water and toilet were available and accessed easily.

11. As per payroll record review and interviews with management all workers were paid monthly. Wages were paid within the first 7 working days of the following pay period. All the employees' wages were paid through bank.

Negative findings:

Three non-compliances were identified in the area of "Management systems and Code implementation", seven non-compliances were identified in the area of "Safety and Hygienic Conditions", one non-compliance was found in the area of "Regular Employment" and one non-compliance was found in the area of "Environment 2-Pillar", for other areas, no violations were noted.

Observation:

Two Observations were found in the area of "Management systems and Code implementation" for others areas, no observations were found.

Good examples:

One Good Example was found in the area of "Living wages and benefits".

The closing meeting was started at 17:40 and the corrective action plan was discussed with the management representatives and workers representative. A copy of the CAPR was given to Yasin Islam Mondol, Assistant Manager- (HR & Compliance). Finally, auditors thanked the management for organizing a professional working environment and good cooperation & support to all and left the company at 18:20 on June 23rd, 2022.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details																										
A: Company Name:	Handz Clothing BD Limited																									
B: Site name:	Handz Clothing BD Limited																									
C: GPS location: (If available)	GPS Address: 433/1, Nanduin, Masterbari, Gazipur Sadar-1700, Gazipur	Latitude: 24.06829 Longitude: 90.38352																								
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Factory License No. 19909/Gazipur, issued by Bangladesh Government, which is valid till June 30, 2022.</p> <p>Trade License No. 141, is issued by Gazipur City Corporation, Which is valid till June 30, 2022.</p> <p>Fire License No. DD/Dhaka/31982/2021, issued by Bangladesh Fire Service & Civil Defence authority which is valid till June 30, 2022.</p> <p>Certificate of Incorporation No. C-115310/14, with life time validity started from April 13, 2014.</p>																									
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	<p>The factory specialized in manufacturing of all kinds of knit garments.</p> <p>The main production process is Knitting, Cutting, Sewing, Finishing & Packing.</p>																									
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Handz Clothing BD Limited was located at GPS Address: 433/1, Nanduin, Masterbari, Gazipur Sadar- 1700, Gazipur, Bangladesh. The site was established in year 2017. The factory specialized in manufacturing of all kinds of knit garments. The total factory area was around 45,800 square feet and the production area was around 42,000 square feet.</p> <p>Building Description:</p> <table border="1"> <thead> <tr> <th>Building No. 01</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Compressor room & Boiler room</td> <td>(Unit-2)</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Building No. 02</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Generator room, Sub-station room & RMS Room</td> <td>(Unit-2)</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Building No. 03</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Security room</td> <td>(Unit-2)</td> </tr> </tbody> </table>		Building No. 01	Description	Remark, if any	Ground Floor	Compressor room & Boiler room	(Unit-2)	Is this a shared building?	No	Nil	Building No. 02	Description	Remark, if any	Ground Floor	Generator room, Sub-station room & RMS Room	(Unit-2)	Is this a shared building?	No	Nil	Building No. 03	Description	Remark, if any	Ground Floor	Security room	(Unit-2)
Building No. 01	Description	Remark, if any																								
Ground Floor	Compressor room & Boiler room	(Unit-2)																								
Is this a shared building?	No	Nil																								
Building No. 02	Description	Remark, if any																								
Ground Floor	Generator room, Sub-station room & RMS Room	(Unit-2)																								
Is this a shared building?	No	Nil																								
Building No. 03	Description	Remark, if any																								
Ground Floor	Security room	(Unit-2)																								

	<table border="1" data-bbox="657 219 1484 286"> <tr> <td data-bbox="657 219 932 286">Is this a shared building?</td> <td data-bbox="932 219 1209 286">No</td> <td data-bbox="1209 219 1484 286">Nil</td> </tr> </table> <p><u>Shed 01 located in (Unit-2):</u> Ground Floor - Cutting section (proposed), sewing section, finishing section, Spot removing room, Finished goods storage & Accessories storage Mezzanine Floor - Finished goods storage, Sample room & Office room</p> <p><u>Shed 02 (Unit-2)::</u> Workers' dining room, Medical room & Childcare room</p> <p><u>Shed 03 (Unit-1)::</u> GF - Fabric store, Generator room & Compressor room Mezzanine Floor- Office</p> <p><u>Shed 04 (Unit-1):</u> Wastage store</p> <p><u>Shed 05 (Unit-1):</u> Knitting section</p> <p><u>Shed 06 (Unit-1):</u> Ground Floor - Cutting section Mezzanine- Office</p> <p><u>Shed 05 (Unit-1):</u> Security shed</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No cracks were observed on the day of audit.</p> <p>F3: Does the site have a structural engineer evaluation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: The site has not a structural engineer evaluation.</p>	Is this a shared building?	No	Nil
Is this a shared building?	No	Nil		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor			

<p>H: Month(s) of peak season: (if applicable)</p>	<p>Same round the year.</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Production Capacity: The production capacity is around 7,80,000 pieces per month.</p> <p>Main Product: The factory specialized in manufacturing of all kinds of knit garments.</p> <p>The main production process: The main production process is Knitting, Cutting, Sewing, Finishing & Packing.</p> <p>Main Equipment: Knitting Machine= 18 sets, Fabric Inspection= 1 set, Doi sting Machine= 01 set, Cutting Machine= 05 sets, Thread Sucker Machine= 02 sets, Auto stepping Machine= 03 sets, Single Needle Plane Machine= 135 sets, 4 Thread Over lock Machine= 133 sets, Flat Lock Cylinder Bed Machine= 47 sets, Flat Lock Flat Bed Machine= 14 sets, Button hole stitch Machine= 05 sets, Button Stitch Machine= 04 sets, Bar-tack Machine= 01 sets, Vertical Machine= 15 sets, Snap Button Machine= 04 sets, Rib-Cutting Machine= 05 sets, Chain Stich Machine= 01 set, Feed of The Arm machine= 04 sets, 2 Needle Lock stitch Machine= 02 sets, PMD= 01 set.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details: Not Applicable</p>

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:35 A2: Day 1 Time out: 18:20	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	2 Man days (2 Auditors X 1 Day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If No, why not: The factory did not complete the Self-Assessment Questionnaire.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Yasin Islam Mondol (Asst. manager-HR & Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not applicable as Worker Representatives was present.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no trade union at this facility and it is not mandatory by law.		

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	180	0	0	0	0	0	0	180
Worker numbers – female	270	0	0	0	0	0	0	270
Total	450	0	0	0	0	0	0	450
Number of Workers interviewed – male	10	0	0	0	0	0	0	10
Number of Workers interviewed – female	16	0	0	0	0	0	0	16
Total – interviewed sample size	26	0	0	0	0	0	0	26



A: Nationality of Management	Bangladeshi	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: ___ Bangladeshi ___ B2: Nationality 2: ___NA___ B3: Nationality 3: ___NA___</p>	<p>Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: Not applicable</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx. % total workforce: Nationality 1 ___100%___ Bangladeshi ___ C1: approx. % total workforce: Nationality 2 ___0%___ C2: approx. % total workforce: Nationality 3 ___0%___</p>	
D: Worker remuneration (management information)	<p>D: ___0___% workers on piece rate D1: ___0___% hourly paid workers D2: ___100___% salaried workers</p> <p>Payment cycle: D3: ___0___% daily paid D4: ___0___% weekly paid D5: ___100___% monthly paid D6: ___0___% other D7: If other, please give details: Not applicable</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	Total group interviews 20 workers (04 group of 05 workers)	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 02	D2: Female: 04
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: Not Applicable	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	No complaint was raised by any sample workers against facility because they were happy with their working environment.	
I: What did the workers like the most about working at this site?	Facility workplace condition is comfortable, timely payment of wages and benefit. Good relationship with facility management.	
J: Any additional comment(s) regarding interviews:	Nothing to Report.	
K: Attitude of workers to hours worked:	Total working hour is within standard and overtime is fully voluntary.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: Not applicable.		
M: Attitude of workers:		

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

The factory allowed the auditor from GSCS International Ltd. to conduct confidential worker interviews. The workers were chosen freely without any influence by the factory management; 26 workers (04 group of 05 workers and 06 individuals) were randomly selected by auditor from different sections for interview. The workers showed a cooperative attitude during the interview process. Based on worker's interview, they expressed their positive attitude to the management and also payment system. All workers were satisfied with working conditions and benefits.

The effective evidences were collected by workers interview; the following information was summarized:

1. Workers said that they were not required to lodge "deposits" or their identity cards at the recruitment and were free to leave or resign after reasonable notice.
2. All interviewees reflected that worker could complain to management & worker committee representatives directly or by writing letters through suggestion box and all interviewed workers were aware of workers' representatives.
3. All workers stated that factory provided induction training for new workers and regular safety training for all workers.
4. All interviewees confirmed that the factory had checked their ID cards or birth certificate to verify their ages. They never seen or heard any child labour less than 18 years old employed in this factory.
5. All interviewed workers said that they were paid by monthly wage system. Wages were paid once a month within first 7 working days of the following pay period. All the employees' wages were paid by cash. No delay of wage was identified through worker interview and management interview.
6. All employees work for 06 days in a week. Weekend of the factory was Friday. The general working hours for all sections in the factory is operating in one shift. This shift starts from 08:00 to 17:00 with one-hour lunch break from 13:00 to 14:00. Only security has three shifts per eight hours each with roster schedule of break & weekend.
7. The interviewed workers said that they could obtain the job based on their working experiences and abilities. The female workers or male workers' wages were calculated at the same for the same work based on their performance.

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

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

During Interview, worker's committee representative expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary. No negative information was observed during the audit.

O: Attitude of managers:

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

The management was found to be well versed with the requirements of social audit, management was very co-operative and transparent during the audit. They were receptive towards findings. The management approach was found to be positive.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it was communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Md. Shafiqul Islam, Senior Executive (HR, & 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.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

1. Documentation files were reviewed. It stipulates complying with Human Rights, written policies and procedure that being provided individually to employees.
2. Letter of Authorization on implementing Human Rights
3. Impact for Human Rights assessment report
4. Management interview and employee interview

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility had posted the policy about respecting Human Rights in the policy board stated that child labour shall not be used, Forced Labour shall not be used, no discrimination was practised, no harsh or inhumane treatment is allowed, disciplinary action taken, working hours etc.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Md. Shafiqul Islam Job title: Senior Executive (HR & Compliance)</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility had established a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter by means of suggestion box, making the contact way of</p>

	management in policy board and public areas in the facility.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: Not Applicable
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility established an effective data privacy procedure for workers' information to protect the workers' privacy information.

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 __3.7__ %	A2: This year: 2022 __2.2__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	3%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 __04__ %	C2: This year: 2022 __5__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	6%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: The facility had maintained injury/ accident records, which were prescribed by the doctors or nurses in medical room, but no injury/ accident & sickness records were maintained during the first aid treatment provided by first aiders in the production floors.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021- 20 Number: 4.44%	F2: This year: 2022- 10 Number: 2.22%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	2.22%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers
---	----------------------------------	-----------------------------------

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- Responsibility for meeting the legal and client code requirements is taken by Yeasin Islam Mondol, Assistant Manager- (HR & Compliance).
- The facility communicated this code of conduct (COC) to the suppliers and employees.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- The facility conducts orientation training for all new employees.
- The facility conducted training to the employees on ETI base code.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.

Three non-compliances were found in the area of "Management system & Code implementation". For details please refer to the contents of 'Non-compliance' and two observations were found in the area of "Management system & Code implementation. For details, please refer to contents of Observation.

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

Details:

- Employee handbook
- Facility Code of Conduct (COC)
- All policies of facility
- Legal license (Factory, Fire, Trade)
- Internal audit records
- Management employee training, training attendance record
- Meeting records

Any other comments: None

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: It was noted through documentation review, facility has policies and procedures for reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Through documents review and workers interview, the written policies (no forced labour, no child labour, non-discrimination, working hours, health & safety, harassment and abuse) were communicated to the workers as much as factory mid-level management & workers were informed by training via notification board and training.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the managers and workers in the facility have received orientation training where standards for forced labour, child labour discrimination, harassment & abuse are covered.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training records were found including picture and attendance sheet.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The site have internationally recognised system certifications e.g. BSCI, OEKOTEX.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has a dedicated Human Resources department consisting 5 members and is headed by Md. Jahangir Hossain, (Head of HR & Payroll).
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Responsibility for meeting the legal and client code requirements is taken

	by Yeasin Islam Mondol, Assistant Manager- (HR & Compliance).
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The factory had adopted a policy decision where by all employees of the company will be required to maintain confidentiality with regard to the affairs of the company & it's greater.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility conducted risk assessment evaluates effectiveness of every policy and procedure department wise.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1Please give details: The facility has an internal system to raise the issue found the risk assessment and to implement the way of reduction it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility established a policy/code which requires labour standards of its own suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has building approval from Gazipur City Corporation.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Not Applicable

<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: Please give details: The facility land is owned by the facility owner.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: Not applicable as the facility are using own land and buildings.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: It was noted through land ownership agreement review and management interview that the facility does not go through illegal appropriation of land for facility building.</p>

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted through training records review, workers & management interview disclosed that workers were not aware of the ETI code of conduct. Note that facility arranged the training on ETI code of conduct but which is not well effective to the workers.</p> <p>Local law and/or ETI requirement: In accordance with Additional Elements 0.B.4: 0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>Recommended corrective action: It is recommended that the factory management should conduct effective training to the workers.</p> <p>Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)</p> <p>Timescale: 60 days.</p>	<p>Objective evidence observed: 1. Based on documents review & management interview</p>
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted through documents review and management interview facility did not have permission for the generators. The facility had 2 diesel generators with (250+120) = 370KW capacity.</p> <p>Local law and/or ETI requirement: In accordance with Additional Elements 0.B.2: 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and</p>	<p>2. Based on documents review & management interview</p>

<p>permissions and to have systems to ensure that all relevant land rights have been complied with</p> <p>The Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1): No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as:- (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.</p> <p>Recommended corrective action: It is recommended that the factory management should obtain the updated licenses and certificate from the concern authorities.</p> <p>Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)</p> <p>Timescale: 60 days.</p> <p>3. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was observed through document review and facility tour that: i) The facility divided into 2 units and established in two premises within 250 meter away. In unit-1 there were 4 single storied sheds. However, in approved building construction plan fabric store and generator shed, knitting shed and wastage store shed was not included. ii) Factory extended 1st floor on the RMS building in unit-2 where there is an office. However, in approved factory layout plan this extended 1st floor was not included.</p> <p>Local law and/or ETI requirement: In accordance with Building Construction Act 1952, 3 (a): No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction.</p> <p>Bangladesh Labour Rule 2015 Rule 353(1): Before use, change or expansion of any houses, building or premises as factory, approval in writing of the inspector general or any officer empowered by him shall be taken. Provided, however, that the inspector general or any officer empowered by him shall not sanction any approval without any inspection on the spot.</p> <p>Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)</p> <p>Timescale: 30 days.</p>	<p>3. Based on documents review & facility tour</p>
--	---

Observation:	
Description of observation:	Objective evidence observed:

<p>1. It was noted that the SAQ was not completed. The factory management explained that they had not been aware how to fill up the SAQ. However, they started this work, and would finalise the SAQ within the next month.</p> <p>Local law or ETI requirement: In accordance with Additional Elements 0.B.1: Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>Comments: The site would finalise the SAQ within the next month.</p> <p>2. It was noted through documents review and management interview that 01 out of 01 boiler operators' competency certificates were expired as per The Boiler Act 2022 published on April 11th, 2022 and as per the act the boiler operators' competency certificates should be validated for 5 years.</p> <p>Local law or ETI requirement: In accordance with Boiler act, 2022, Act- 09(1,6): 1) No person can operate the boiler unless he is licensed to operate the boiler. 6) The boiler operating license will be valid for 5 years and will be renewable.</p> <p>Comments: The site need to collect updated competency certificates for their boiler operators immediately.</p>	<p>1. Based on SAQ onsite review and management interview</p> <p>2. Based on SAQ onsite review and management interview</p>
--	---

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- The factory 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 was voluntary.
- The terms and conditions of employment state that the workers 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 did not use any prison labour.
- The above was confirmed in management and employees' interviews.

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

Details:

1. Personnel files
2. Factory policy, rules and regulations, and training records etc.
3. Resignation records
4. Factory rules
5. Employee handbook
6. Management and worker interview

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected: Not Applicable.</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected: Not Applicable.</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	C1: If yes, please give details and category of worker affected: Not Applicable.
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Facility has a policy mentioning workers are free to terminate employment from the facility with 02 months' notice period.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Not Applicable.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: No evidence of any restrictions on workers freedoms to leave the site at the end of the workday.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility established a policy about forbidden of forced / trafficked /bonded labour and implemented strict management system to control the risk of forced / trafficked / bonded labour in its supply chain. The facility sent agreement of commitment to its suppliers, and operated social responsibility audit on suppliers to control the risk of forced / trafficked / bonded labour in its supply chain.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Factory had provided training and awareness session to all employees to reduce the risk of forced / trafficked labour.

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

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

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

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- All the employees are allowed to form or join the trade union of their choice.
- There was no trade union in the facility but there is a Participation Committee formed by election.
- Participation Committee was formed by election on November 4th, 2021.
- Last meeting of the committee was held on May15th, 2022.
- Meeting minutes are posted in notice board and recorded in a register.
- There are 05 members from workers' side and 05 from management side with a total of 10 members.
- PC members were not treated less favourably than other workers.
- PC members were allowed to carry out their duties within working hours without affecting their pay.

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

Details:

1. Freedom of association policy review
2. Facility management interviews
3. Worker interview
4. Complain box register (Suggestions from the complaint box and actions taken)
5. Participation Committee formation record review and its meeting records review, grievance handling policy & procedure.

Any other comments: None

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

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has an effective handling procedure. Workers can submit their grievance verbally or in written through welfare officer, PC members or complain box. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The PC members able to perform their responsibility without any management intervention though the factory had formed participation committee by election process.	
F: Name of union and union representative, if applicable:	Not Applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation Committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All workers are well aware of their representatives.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: November 4 th , 2021
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please state how many: One representative from the workers participation committee had been interviewed.	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	10 worker representatives were elected by the workers among the workers to represent each section of the facility. The last communication meeting was held on May 4 th , 2021 with topic of discussion of last meeting agenda, Change of President, nomination of worker representatives for vacant posts etc. Meeting minutes was shared with all workers through posting the meeting minutes on communication board.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes, what percentage by trade Union/worker representation	M1: __N/A__% workers covered by Union CBA	M2: __N/A__% workers covered by worker rep CBA

M3: If Yes, does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--

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

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

To complete 'current systems' 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

- Md. Safiqul Islam, Sr. Executive (HR & Compliance) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets 30 (12 for male and 18 for female) 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 there are every three months Health and Safety meeting held. Last meeting was held on May 22th, 2022.

2. Fire Safety

- Sufficient assembly area was found in front of the facility building.
- Firefighting equipment was adequate and checks were up-to-date.
- The facility management posted the evacuation plans on production floors with local language.

3. Fire Drill information

Type of Fire Drill	Date	Time Duration	No. of Participant	Conducted by
Day (External)	12.06.2022	01:07 minutes	438	Yeasin Islam Mondol Assistant Manager-(HR & Compliance)
Day (Internal)	03.05.2022	01:09 minutes	436	Md. Enaet Uddin- Senior Station officer (FSCDS), Gazipur.

Facility provide bellow training to employees:

Training Name	Date	Participant	Name of Trainer
1. New Workers Orientation Training	14.05.2022	07	Md. Shafiqul Islam, Senior Executive (HR & Compliance)
2. First aid training	07.06.2022	14	Mst. Afsana Akter, Factory Medical Officer

3. Fire Fighting & Rescue Training	09.06.2022	11	Md. Shafiqul Islam, Senior Executive (HR & Compliance)
4. Mid-Level Management Training	18.06.2022	09	Md. Shafiqul Islam, Senior Executive (HR & Compliance)
5. Occupational Health & Safety Training	08.06.2022	04	Md. Salim Hossain, Officer (Human Resouce)
6. Grievance Submission & Handling Training	15.06.2022	07	Md. Shafiqul Islam, Senior Executive (HR & Compliance)
8. P.P.E Training	05.06.2022	06	Md. Shafiqul Islam, Senior Executive (HR & Compliance)
9. Anti-harassment training	19.06.2022	07	Md. Shafiqul Islam, Senior Executive (HR & Compliance)
10. Code of Conduct	04.06.2022	06	Md. Shafiqul Islam, Senior Executive (HR & Compliance)

4. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
- Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

5. Chemical safety

- Facility uses chemical for their production process and provided training and Personal Protection Equipment. MSDS, label and secondary containment were found with all the chemicals.

6. Medical services

- There were 05 first aid boxes in the facility.
- Facility has appointed 01 doctor and 01 nurse who are available in working time of the facility. They also arranged monthly first aid training with first aiders.
- Facility has a medical room.

7. Dormitory

- Facility didn't provide dormitory facilities to any employees.

Seven non-compliances were found in the area of "Working Conditions are Safe and Hygienic". For details, please refer to contents of 'Non-compliances'.

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

Details:

1. License review (Fire license, Trade license, Factory license)
2. Building approval plan and layout approval plan
3. Group insurance
4. Drinking water test report
5. Injury record and analysis report
6. Machine and electric maintenance record
7. Risk assessment report
8. Training record (Fire training, First aid training, PPE training and Health and safety training)
9. Fire drill record
10. Health and safety committee register
11. Fire equipment and electric equipment checking record

Any other comments: None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Factory had adopted health & safety policy which covers PPE, machine safety device, fire safety (fire extinguisher, firefighting equipment, hose pipe etc.), emergency pathway, evacuation drill, housekeeping, first aid, electrical safety etc. Last training was conducted on June 8th, 2022.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable government law are included.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There were no structural additions without prior permits/ inspections.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The site kept dedicated PPE(s) for visitors. While any visitor visits in the factory generally, they brief the visitor about H&S policy and provide PPE(s) as and when required.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has a medical room dedicated for workers with doctor & nurse. The room does not meet the legal requirements.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility has a medical room dedicated for workers with doctor & nurse. The room does not meet the legal requirements.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The factory does not provide transport facility to their workers.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Not applicable as the factory did not provide living space to the workers.</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Workers risk assessment is done on a monthly basis according to the training schedule.</p>

<p>J: 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 J1: Please give details: The facility meets all the legal obligations on environmental requirement including required permits for use and disposal natural resources like water, gas etc.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Factory did not use banned chemicals and follows the entire customer requirement on environmental standard.</p>

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: It was noted during facility tour and management interview that the factory did not install the interconnected fire alarming and smoke detection system in the building. Note that only manual smoke detectors and fire alarming system are present in the production area.</p> <p>Local law and/or ETI requirement In accordance with ETI Base Code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>In accordance with Bangladesh National Building Code 2006, Part 04, Section 4.6.1 (b): (b) The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants.</p> <p>Recommended corrective action: It recommended that the facility management should install interconnected fire alarm and smoke detection system throughout the facility.</p> <p>Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)</p> <p>Timescale: 30 days.</p> <p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: It was observed through facility tour and document review that in unit-1 fabric store and generator shed, knitting shed and wastage store shed was not covered under the fire license. Note that facility management applied to include the mentioned area in the fire license.</p>	<p>Objective evidence observed: 1. Based on facility tour & management interview N.C. Photo No: 01</p> <p>2. Based on facility tour & document review</p>

Local law and/or ETI requirement:

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

In accordance with Bangladesh Fire Prevention Act 2003 Sec 4(1): (1) If a person wants to use a building or space as a warehouse or factory, he has to obtain a license from the director under this Act or rule.

Recommended corrective action: It is recommended that facility shall obtain updated fire license covering all mentioned area in from the concern authority.

Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)

Timescale: 30 days.

3. Description of non-compliance:

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

It was observed through facility tour that in medical room bellow required elements found missing:

- i) wheel chair
- ii) 2 buckets or pots with closely-fitted lids
- iii) 1 kettle for boiling water
- iv) 6 woolen blankets
- v) 6 hand towels
- vi) 1 bottle of 1:20 carbolic lotion
- vii) Tetanus serum
- viii) 4 trays
- ix) Sterilizer

Local law and/or ETI requirement

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

In accordance with Bangladesh Labour Rule 2015 Rule 77(5): (5)

- a) 1 coated pot of hot and cold water;
- b) 1 table measuring 1.85 X 1.10 meters with smooth surface;
- c) Arrangement of disinfecting equipments;
- d) 2 beds for lying, 2 stretchers and 1 wheel chair;
- e) 2 buckets or pots with closely-fitted lids;
- f) 1 kettle for boiling water and Spirit stove or any other appropriate arrangement;
- g) 12 wooden 'choti' of general type, measuring 91.44 cm X 10.16 cm X 0.63 cm;
- h) 12 wooden 'choti' of general type, measuring 35.56 cm X 7.62 cm X 0.63 cm;

3. Based on facility tour

N.C. Photo No: 02

- i) 6 wooden 'choti' of general type, measuring 25.40 cm X 5.08 cm X 0.63 cm;
- j) 6 woolen blankets;
- k) 1 pair of artery forceps;
- l) 2 middle sized sponges;
- m) 6 hand towels;
- n) 4 trays;
- o) 4 carbolic soap;
- p) 2 glass pots;
- q) 2 thermometers and several hypodermic syringes;
- r) Gas measurement tools and tea spoons;
- s) Eyewash station;
- t) 1 bottle of 1:20 carbolic lotion;
- u) 3 chairs;
- v) 1 curtain;
- w) 1 electric hand torch;
- x) One primary aid box or almirah as per Section 76(1);
- y) Adequate supply of serum that is preventive of Tetanus and
- z) Instruments for stopping bleeding, for example- Turniccate.

Recommended corrective action: It is recommended that facility shall ensure required elements in the medical room.

Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)

Timescale: 30 days.

4. Description of non-compliance:

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

It was observed through facility tour that 3 out of 3 first aid boxes found with below missing elements:

- i) 1 copy of leaflet regarding primary aid
- ii) analgesic and antacid type of tablets
- iii) ointments for eyes
- iv) first aid register
- v) 3 packs of edible saline
- vi) 3 large sized sterile bandages

Local law and/or ETI requirement

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

In accordance with Bangladesh Labour Rule 2015 Rule 76(2): 2) If the number of workers/employees is not more than 10 in the concerned institute, department, section and floor where mechanical power is used or if the number of workers/employees is not more than 50 in the workplace where mechanical power is not used, the following equipments must be each cupboard or almirah of those workplaces:

- a) 6 small sterile bandages;

4. Based on facility tour

N.C. Photo No: 03

- b) 3 packets of disinfected cotton, weighing 0.5 ounce each;
- c) 3 medium sized disinfected bandages;
- d) 3 large sized sterile bandages;
- e) 3 large sized sterile bandages that are used in case of burns;
- f) 1 bottle of Hibisol or Hexasol, weighing 1 ounce;
- g) 1 bottle of rectified Spirit, weighing 1 ounce;
- h) 1 pair of scissors;
- i) 1 copy of leaflet regarding primary aid;
- j) Analgesic and antacid type of tablets, ointments used for burnt parts, ointments for eyes and antiseptic solution appropriate for surgery and
- k) 3 packs of edible saline.

Recommended corrective action: It is recommended that facility shall conduct night fire drill as earliest.

Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)

Timescale: 30 days.

5. Description of non-compliance:

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

It was observed through document review and management interview that facility did not conduct night fire drill as the knitting section operated in day and night shift (08:00 PM to 05:00 AM).

Local law and/or ETI requirement

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

In accordance with Bangladesh Labour Rule 2015 Rule 55(14): (14) As per Section 62(8), fire drills and emergency evacuation drills have to be arranged at least once in every six month period and the same has to be preserved in respective record books, in accordance with Form- 22. In addition, the concerned Inspector and nearby Fire Service Station have to be informed minimum 15 days before the drills are held.

Recommended corrective action: It is recommended that facility shall conduct night fire drill as earliest as possible.

Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)

Timescale: 30 days.

6. Description of non-compliance:

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

It was observed through facility tour that, in dining and canteen room seating capacity was not adequate in line with law. Note that the facility had 47 seating

5. Based on document review and management interview

6. Based on document review and management interview

<p>capacity. However, in accordance to 450 workers facility had to provide 135 seating capacity in the dining and canteen room.</p> <p>Local law and/or ETI requirement In accordance with ETI Base Code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment</p> <p>In accordance with Bangladesh labour rules 2015, Rule- 87(1): 87) Canteen: 1) The Owner of the institute where more than 100 (one hundred) workers are employed shall arrange a canteen for the workers, facilitating adequate space for minimum 10% of total number of workers. However, if the aforesaid canteen can accommodate 30% of the total workers for having meals, the Owner is not obliged to arrange a separate meal room as per Section 93.</p> <p>Recommended corrective action: It is recommended that facility shall provide adequate seating capacity in the dining and canteen room.</p> <p>Action by: Yasin Islam Mondol (Asst. manager-HR & Compliance)</p> <p>Timescale: 60 days.</p>	<p>N.C. Photo No: 04</p>
<p>7. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: It was observed through facility tour that registration number plate was not posted on the boiler.</p> <p>Local law and/or ETI requirement In accordance with ETI Base Code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment</p> <p>In accordance with Bangladesh Boiler Act 2022 Sec 22(1-c): 1 (c) Permanent attachment of boiler number given by Chief Boiler Inspector.</p> <p>Recommended corrective action: It is recommended that facility shall post the registration number on the boiler machine.</p> <p>Action by: Yasin Islam Mondol, Assistant manager (HR & Compliance)</p> <p>Timescale: 60 days.</p>	<p>7. Based on document review and management interview</p>

Observation:	
Description of observation: None Observed Local law or ETI requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 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 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 doctor.
- 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.
- It was evident during the documents review; the age of youngest worker is 18+ years old (DOB: October 10th 2003 & DOJ: March 13th, 2022). During the facility walkthrough, there were no concerns regarding child labour observed.

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

Details:

1. The procedure of Recruiting regulation was available for review, the personnel files with ID or birth certificate copy were available for review, the contracts with all the employees were available for audit, and the roster had established by the factory.
2. Document review
3. Management interview
4. Worker interview
5. On-site observation during floor visit

Any other comments: None

A: Legal age of employment:	14+ years with significant restriction
B: Age of youngest worker found:	18+ years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details: Not Applicable

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

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Based on the Gazette Notification, the actual lowest minimum wage in the facility is BDT 8,000 per month.
- Time keeping was Face detection system.
- All workers were 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.
- The facility provided pay slip during pay period to their workers.
- All employees were paid within 7 working days of the following month.
- Employees were aware of their minimum wage.
- Wages have been recorded according to documents checked.
- According to the documents which were provided by the HR & Accounts Departments and during the workers interview, it was noted that factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Moreover, employees were allowed to take 14 days' sick leave; 10 days' casual leave according to law and 11 days' festival leave.

One good example was found in the area of "Living wages and benefits". For details, please refer to contents of 'Good example'.

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

Details:

1. Document review
2. Worker interview
3. Management interview
4. Local and national laws
5. Wages and benefits policy
6. Local legal minimum wage documents
7. Payroll records from June 2021 to audit date
8. Leave records
9. Social group insurance and payment receipts from the local labour department
10. Labour contracts for all employees
11. Resignation records

12. Payslips of all workers interviewed
 13. Overtime records

Any other comments: None

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

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

Good Examples observed:	
Description of Good Example (GE): 1. The factory provides monthly attendance bonus BDT 400 to the helpers and BDT 600 to the operators as per factory policy.	Objective Evidence Observed: 1. Payroll records review and workers & management interview

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 08 hours per day 48 hours per week	A1: 08 hours per day 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<p>B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)</p>	<p>Legal maximum: 2 hours/ day and 12 hour/ week</p>	<p>B1: 2 hours/ day and 12 hour/ week</p>	<p>B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: Legal minimum for the Garments division: Grade-1: 18257 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month</p>	<p>C1: Legal minimum for the Garments division: Grade-1: 18257 BDT/Month Grade-2: 15416 BDT/Month Grade-3: 9845 BDT/Month Grade-4: 9347 BDT/Month Grade-5: 8875 BDT/Month Grade-6: 8420 BDT/Month Grade-7: 8000 BDT/Month Trainee / Apprentice: 5975 BDT/Month</p>	<p>C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 200% of basic wage</p>	<p>D1: 200% of basic wage</p>	<p>D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

<p style="text-align: center;">Wages analysis: (Click here to return to Key Information)</p>	
<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If No, why not?</p>	<p>Not Applicable</p>
<p>B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</p>	<p>26 samples from the month of May 2022 (Current month) 26 samples from the month of December 2021 (Random month) 26 samples from the month of June 2021 (Random month)</p>
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: If Yes, please give details: The Government has announced the pay structure, which was implemented from 1st December 2018 for the workers of the Garments Industries. The amended Gazette Notification has been published on 24th January, 2019. There are two separate pay structures; for the garment workers (Schedule A) 1. For the workers (Schedule A):</p>

		<table border="1"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk. 10938</td> <td>Tk. 5469</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 18257</td> </tr> <tr> <td>Grade 2</td> <td>Tk. 9044</td> <td>Tk. 4522</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 15416</td> </tr> <tr> <td>Grade 3</td> <td>Tk. 5330</td> <td>Tk. 2665</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9845</td> </tr> <tr> <td>Grade 4</td> <td>Tk. 4998</td> <td>Tk. 2499</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9347</td> </tr> <tr> <td>Grade 5</td> <td>Tk. 4683</td> <td>Tk. 2342</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8875</td> </tr> <tr> <td>Grade 6</td> <td>Tk. 4380</td> <td>Tk. 2190</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8420</td> </tr> <tr> <td>Grade 7</td> <td>Tk. 4100</td> <td>Tk. 2050</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8000</td> </tr> <tr> <td>Apprentice</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Tk. 5975</td> </tr> </tbody> </table> <p>2. For the staff level (Schedule B) employees:</p> <table border="1"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk.8150</td> <td></td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 14075</td> </tr> <tr> <td>Grade 2</td> <td>Tk.6300</td> <td>Tk.3150</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 11300</td> </tr> <tr> <td>Grade 3</td> <td>Tk.5950</td> <td>Tk.2975</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 10775</td> </tr> <tr> <td>Grade 4</td> <td>Tk.4350</td> <td>Tk.2175</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8375</td> </tr> <tr> <td>Apprentice</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>Tk. 6164</td> </tr> </tbody> </table>	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk. 10938	Tk. 5469	Tk.600	Tk.350	Tk.900	Tk. 18257	Grade 2	Tk. 9044	Tk. 4522	Tk.600	Tk.350	Tk.900	Tk. 15416	Grade 3	Tk. 5330	Tk. 2665	Tk.600	Tk.350	Tk.900	Tk. 9845	Grade 4	Tk. 4998	Tk. 2499	Tk.600	Tk.350	Tk.900	Tk. 9347	Grade 5	Tk. 4683	Tk. 2342	Tk.600	Tk.350	Tk.900	Tk. 8875	Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk. 8420	Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk. 8000	Apprentice						Tk. 5975	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk.8150		Tk.600	Tk.350	Tk.900	Tk. 14075	Grade 2	Tk.6300	Tk.3150	Tk.600	Tk.350	Tk.900	Tk. 11300	Grade 3	Tk.5950	Tk.2975	Tk.600	Tk.350	Tk.900	Tk. 10775	Grade 4	Tk.4350	Tk.2175	Tk.600	Tk.350	Tk.900	Tk. 8375	Apprentice						Tk. 6164
Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage																																																																																																					
Grade 1	Tk. 10938	Tk. 5469	Tk.600	Tk.350	Tk.900	Tk. 18257																																																																																																					
Grade 2	Tk. 9044	Tk. 4522	Tk.600	Tk.350	Tk.900	Tk. 15416																																																																																																					
Grade 3	Tk. 5330	Tk. 2665	Tk.600	Tk.350	Tk.900	Tk. 9845																																																																																																					
Grade 4	Tk. 4998	Tk. 2499	Tk.600	Tk.350	Tk.900	Tk. 9347																																																																																																					
Grade 5	Tk. 4683	Tk. 2342	Tk.600	Tk.350	Tk.900	Tk. 8875																																																																																																					
Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk. 8420																																																																																																					
Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk. 8000																																																																																																					
Apprentice						Tk. 5975																																																																																																					
Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage																																																																																																					
Grade 1	Tk.8150		Tk.600	Tk.350	Tk.900	Tk. 14075																																																																																																					
Grade 2	Tk.6300	Tk.3150	Tk.600	Tk.350	Tk.900	Tk. 11300																																																																																																					
Grade 3	Tk.5950	Tk.2975	Tk.600	Tk.350	Tk.900	Tk. 10775																																																																																																					
Grade 4	Tk.4350	Tk.2175	Tk.600	Tk.350	Tk.900	Tk. 8375																																																																																																					
Apprentice						Tk. 6164																																																																																																					
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If No, please give details: Not Applicable</p>																																																																																																									
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: The actual lowest minimum wage in the facility was BDT. 8,000 per month. This is government declaring legal minimum wage.</p>																																																																																																									
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: __0__% of workforce earning under minimum wage F2: __19.11__% of workforce earning minimum wage F3: __80.89__% of workforce earning above minimum wage</p>																																																																																																										
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: 1. The facility provides festival two bonuses 50% of basic after completing one year of services in every year. 2. The factory provides monthly attendance bonus BDT 300 to all workers as per the factory policy.</p>																																																																																																										
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. However,</p>																																																																																																										

	the factory is deducting only for un-authorized absence and revenue stamp deduction.		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Absent deduction in case of worker is absent as per law. 2. Revenue Stamp Please describe: The factory deducted for absent and revenue stamp.
		I2: Please list all deductions that have not been made.	1. Group Insurance Please describe: The factory did not deduct for group insurance.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Facility shows all real records which reflect all scenario. Factory had provided accurate and complete payroll & attendance records to the auditors for review where all working hours were recorded.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Factory did not define living wages as it is not required by law.		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not Applicable		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: At least 5% of basic wages shall be increased yearly.		

workers plus discretionary income).	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All employees were paid within 7 working days of the following month.
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Based on employees' interview, copy of appointment letter issued to the employees and wage records, it was noted that equal rates are paid for equal work.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: Not applicable

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 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 employees' interviews, no inconsistency was noted either.
- Through employees' interview, overtime is voluntary.
- Time cards are completed electrically.
- All overtime is compensated at a premium rate for all employees.
- The time frame of the records reviewed are as follows:
 - 26 samples from the month of May 2022 (Current month)
 - 26 samples from the month of December 2021 (Random month)
 - 26 samples from the month of June 2021 (Random month)

According to time records and worker interview basic working hours were 8 hours per day and a max 48 hours per week. Maximum OT 2 hours per day and 12 hours per week were found in the three sample months. The employee works for 06 days in a week. The employee works for 06 days in a week (Saturday to Thursday). Weekend of the factory was Friday. The general working hours for all sections in the factory is

operating in one shift. This shift starts from 08:00 to 17:00 with one-hour lunch break from 13:00 to 14:00. Only security has three shifts per eight hours each with roster schedule of break & weekend.

One non-compliance was found in the area of "Working Hours Are Not Excessive". For details, please refer to content of 'Non-compliance'

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

Details:

1. Employee interview
2. Management interview
3. Local and national laws
4. Factory policy on working hours
5. Attendance and wages records from June 2021 to audit date
6. Manual attendance system
7. Sample pay slips with recorded hours all workers interviewed
8. Quality and production records to cross check hours
9. Workers contracts

Any other comments: None

Non-compliance:

Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:
None Observed

Objective evidence observed:
Not Applicable

Local law and/or ETI requirement:
Not Applicable

Recommended corrective action:
Not Applicable

Observation:

Description of observation:
None Observed

Objective evidence observed:
Not Applicable

Local law or ETI requirement:
Not Applicable

Comments:
Not Applicable

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective Evidence Observed:
Not Applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Attendance and work timings (including OT) record was maintained by face recognition system (electronic attendance machine).				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details: Not applicable				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not applicable			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		Not applicable			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes, please detail hours, %, types of workers affected and frequency Please give details: NA			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		The factory worked maximum 6 days in a week without a day off.			
Standard/Contracted Hours worked					
	<input type="checkbox"/> Yes	G1: If yes, % of workers & frequency:			

G: Were standard working hours over 48 hours per week found?	<input checked="" type="checkbox"/> No	Not applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes	H1: If yes, please give details:
	<input checked="" type="checkbox"/> No	Not applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: May 2022: 2 hours per day, 12 hours per week, 38 hours per month December 2021: 2 hours per day, 12 hours per week, 50 hours per month June 2021: 2 hours per day, 12 hours per week, 52 hours per month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___5.12___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on the factory policy, rules and regulations, and training records, employee handbook and workers and management interview it was noted that the overtime is voluntary in this factory.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages: 200% of basic wages as overtime rate.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: Double of basic wages
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	

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

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

To complete 'current systems' 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 was no restriction for formation of trade union in the factory.

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

Details:

1. The hiring and termination procedure, leave application records and employee handbook.
2. Payroll records
3. Attendance records
4. Termination records
5. Training records
6. Employment contracts were provided for review and they showed that male and female employees were on the same pay grade.
7. Management interview and employee interview

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>71.43</u> % A2: Female <u>28.57</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0%
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: As per documents review, management & works interview, there was no evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
---	---

Professional Development	
A: What type of training and development are available for workers?	All workers are given H&S training, different types of machine operation and quality assurance training.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: Not Applicable
--	--

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

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

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective Evidence
Observed:
Not Applicable

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- 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.
- All workers getting signed labour contract and ID card during their recruitment.
- Factory maintains service books for all workers
- Factory has policy to provide all kinds of compensation and benefits to the employees
- If any employees want to leave the job, he or she may leave giving 60 days' notice prior to leave as per law.
- No temporary worker, apprenticeship schemes or home worker was identified by the auditors.

One non-compliance was found in the area of "Regular Employment Is Provided". For details, please refer to content of 'Non-compliance'.

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

Details:

1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc.
2. Management interview and employee interview
3. The hiring and termination records.
4. Worker interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

It was observed through document review and workers interview that facility management did not provide leave book to the workers. However, facility management maintain leave register in software.

Local law and/or ETI requirement:

In accordance with ETI base code 8.1: To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

In accordance with Bangladesh Labour Rules 2015, Rule 108 (1): 1) The Owner or the Manager shall provide a Leave Book to each worker in accordance with Form-9.

Recommended corrective action: It is recommended that facility shall provide leave book to the workers.

Action by: Yasin Islam Mondol, Assistant manager (HR & Compliance)

Objective evidence observed:

1. Based on document review and workers interview

Timescale: 30 days.	
---------------------	--

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

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

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not Applicable
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected: Not Applicable

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

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

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: Not Applicable
C: If any checked, give details:	Not Applicable

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

Contractors:	
<p><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: Not Applicable
B: If Yes, how many workers supplied by contractors?	Not Applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: Not Applicable
D: If Yes, please give evidence for contractor workers being paid per law:	Not Applicable

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- As per factory tour, documents review and management & workers interview, there was no sub-contractor or home working used by facility currently.
- Therefore, no apparent concern was detected regarding this section.

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

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

Process Subcontracted	Printing
Name of factory	Famkam Printing Ltd Contact Name: Md. Robi Contact No: +8801712-213447 Email ID: robi.lithigroup@gmail.com
Address	Shirir Chala, Bager Bazar, Gazipur, Bangladesh

Details:

1. Management interview & workers interviews
2. Production capacity plan
3. Material in/out registers
4. Production process of the factory
5. Policies and procedures

Any other comments: None

Non-compliance:	
Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed Local law and/or ETI /Additional Elements requirement: Not Applicable Recommended corrective action: Not Applicable	Objective evidence observed: Not Applicable

Observation:	
Description of observation: None Observed Local law or ETI/Additional elements requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable

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

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: As per the capacity and style running in the factory observed by the auditors during the factory tour, interview with the management and through documents, it was assessed by the auditors that factory has all the required machines and manpower to deliver the capacity. And no undeclared sub-contracting was observed.
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes, summarise details: It was noted during interview with the management that they are transparent with every client and disclose each and every process that is carried out with sub-contractors.

<p>C: Number of sub-contractors/agents used:</p>	<p>It was noted from interaction with management that factory has been using 01 sub-contractor for getting their processes Printing. And details of sub-contractor are as under:</p> <p>Printing: Famkam Printing Ltd, Contact Name: Md. Robi, Contact No: +88 01712-213447</p>
<p>D: Is there a site policy on sub-contracting?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If Yes, summarise details: Factory has brief profile of sub-contractor mentioning the details of sub-contractor. Further factory has a policy of selection criteria of sub-contractor and internal reports of sub-contractor in terms of Social Audit aspects.</p>
<p>E: What checks are in place to ensure no child labour is being used and work is safe?</p>	<p>Currently, the sub-contractor was monitored by the site. They had established a periodic checking system that no children were observed working at the sub-contracting site & the working environment was safe. Customers were also aware of the sub-contracting processes and they also monitored as per their social compliance auditing aspects. All monitoring reports were provided for review during audit.</p>

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

H: Are full records of homeworkers available at the site?

- Yes
- No

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Through direct supervisors, managers and suggestion box.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers can share their concern with Welfare Officer; drop to their complaint into suggestion box and even go to the top management.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Suggestion Box and Welfare Officer</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: All workers were aware of these processes; suggestion box was known by the workers; workers can drop their complains into suggestion box and even go to the top management.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details: Not applicable</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: If no, please give details: The site does not have any mechanism to encourage its' business partners to provide individuals and communities with access to effective grievance mechanism.</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain: Not applicable</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details: Not applicable</p>

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: If yes, please give details: Absent deduction in case of worker is absent as per law.</p>
--	---

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 anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Anti-harassment issue is also covered in employee training.
- Through the factory management and employees' interview, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

- The relevant policy on prevention of harassment and abuse.
- Internal grievance procedure documentation.
- Training records.
- Management interview and employee interview.

Any other comments: None

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

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

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

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

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

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

- Per document review, factory management representation and workers interview, it was observed that all workers in the factory were Bangladeshi and 100% were local workers and no permission was required for working from one district to another district.
- All workers had the proper legal rights to work in this region.
- All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes.
- No agency staff or foreign worker was used by the factory.
- There were not any deductions for items such as travel and equipment.

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

Details:

1. Hiring procedure
2. Personnel files
3. Worker handbook
4. Worker interview
5. Management interview

Any other comments: None

Non-compliance:

Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None Observed

Objective evidence observed:

Not Applicable

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through onsite visit, workers & management interviews and documents review, no violation of environment pollution was observed.
- The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- Factory management has appointed a designated person Yeasin Islam Mondol, Assistant Manager (HR & Compliance)- to take care about environmental requirement.
- Production process of the factory is Knitting, Cutting, Sewing, Finishing & Packing. No hazardous types of chemicals are used in the factory. Factory management has conducted training on minimal uses of water, energy and natural resource to all employees.
- Factory management has the agreement with waste collect company for the disposal of general wastages like jute, fabrics, poly, wastage cartons, papers etc. Factory management is aware about the environmental impact of their business activities.

One non-compliance was found in the area of "Other Issue Areas 10B2: Environment 2 Pillar". For details, please refer to content of 'Non-compliance'.

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

Details:

1. Environmental policy and procedures
2. Environmental impact report form and approval
3. Management interview
4. Worker interview
5. Site tour

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law It was observed through document review and management interview that the test result of air emission, noise level, light, temperature was expired on June 1st, 2022.</p> <p>Local law and/or ETI/Additional Elements requirement: In accordance with Additional Element 10B2.1: Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>Recommended corrective action: It is recommended that facility shall conduct air emission, noise level, light, temperature test as earliest.</p> <p>Action by: Yasin Islam Mondol, Assistant manager (HR & Compliance)</p> <p>Timescale: 30 days.</p>	<p>Objective evidence observed: 1. Based on document review and management interview</p>

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

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

Other findings

Other Findings Outside the Scope of the Code

None Observed

Community Benefits

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

None Observed

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

Photo Form

<p>Factory Name</p>	<p>Factory Gate</p>	<p>Factory Shed</p>
<p>Knitting Section</p>	<p>Cutting Section</p>	<p>Sewing Section</p>
<p>Ironing Section</p>	<p>Finishing Section</p>	<p>Packing Section</p>

<p>Finished Goods Area</p>	<p>Fabric Store</p>	<p>Accessories Store</p>
<p>Emergency Evacuation Plan</p>	<p>Hose-pipe Testing</p>	<p>Fire Hose Reel</p>
<p>Fire Extinguisher</p>	<p>Firefighting Equipment</p>	<p>Fire Alarm Switch</p>
<p>Exit Sign & Fog Light</p>	<p>Fire Rated Door</p>	<p>Attendance Machine</p>



NC-Photos

<p>Factory did install the Manual Smoke Detector instead of interconnected smoke detection system N.C: Photo-01</p>	<p>In medical room adequate elements found missing N.C: Photo-02</p>	<p>First aid boxes found missing elements N.C: Photo-03</p>
<p>Dining and canteen room seating capacity was not adequate in line with law N.C: Photo-04</p>		



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>