



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC416080900	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS416081287	
Business name (Company name):	RACE ECO CHAIN LIMITED			
Site name:	Race Eco Chain Ltd			
Site address:	Anisha Building, 56/33, Site 4, Industrial Area, Sahibabad, Ghaziabad- 201010 Ghaziabad 201010 IN	Country:	IN	
Site contact and job title:	Mr. Manish Madan / Marketing Manager			
Site phone:	9871692101	Site e-mail:	accounts@raceecochain.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2023-12-22			

Audit Company Name:
EUROCERT INSPECTION SERVICES PVT LTD

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

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Kasak Pal	APSCA Number:	32200503
Additional Auditors:	Bhupendra Kumar		21705095
Date of declaration:	2023-12-22		

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

Site Representation	
Full Name:	Mr. Manish Madan
Title:	Marketing Manager
Date of declaration:	2023-12-22
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
Nil	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.1	§1	1	0	0	NC - ZAF600291367
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1 3.1	§2 §3 §4 §5 §6	5	0	0	NC - ZAF600291368 NC - ZAF600291369 NC - ZAF600291370 NC - ZAF600291371 NC - ZAF600291372
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter XI Supplemental, Section 118 – Display of notices, The abstract of the Act and the rules required by Section 108(1) to be displayed in every factory shall be in the prescribed Form No. 20.
§2	In accordance with the Factories Acts 1948, Chapter IV Safety, Section 38 – Precautions in case of fire, (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain— (b) the necessary equipment and facilities for extinguishing fire.
§3	In Accordance with the Uttar Pradesh Factories Rules 1950 Chapter IV Safety Section 61. Fire (11) First-aid firefighting arrangements (f) All first-aid firefighting equipments shall be placed in a conspicuous position and shall be readily and easily accessible for immediate use. Generally, these equipments shall be placed as near as possible to the exits or stair landing of normal routes of escape.

<p>§4</p>	<p>In accordance with the Indian Electricity Rules, 1956, Section – 36. Handling of electric supply lines and apparatus- (1) Before any conductor or apparatus is handled adequate precautions shall be taken, by earthing or other suitable means, to discharge electrically such conductor or apparatus, and any adjacent conductor or apparatus if there is danger there from, and to prevent any conductor or apparatus from being accidentally or inadvertently electrically charged when persons are working thereon. Every person who is working on an electric supply line or apparatus or both shall be provided with tools and devices such as gloves, rubber shoes, safety belts, ladders, earthing devices, helmets, line testers, hand lines and the like for protecting him from mechanical and electrical injury. Such tools and devices shall always be maintained in sound and efficient working conditions: (2) No person shall work on any live electric supply line or apparatus and no person shall assist such person on such work, unless he is authorised in that behalf, and takes the safety measures approved by the Inspector. (3) Every telecommunication line on supports carrying a high or extra-high voltage line shall, for the purpose of working thereon, be deemed to be a high voltage line.</p>
<p>§5</p>	<p>In accordance with the Uttar Pradesh Factories Rules 1950, Chapter IV A Provisions relating to Hazardous Process, Section 63 J – Occupational Health Centres, (1) In respect of any factory carrying on 'hazardous process' there shall be provide and maintained in good order an occupational Health Center with the services and facilities as per scale laid down hereunder: (a) for factories employing up to 50 workers: (i) the services of a Factory Medical Officer on retainer ship basis in his clinic to be notified by the occupier. He will carry out pre-employment and periodical medical examinations as stipulated in rule 63-I and render medical assistance during an emergency. (ii) a minimum of 5 persons trained in first aid procedures of whom at least one shall always be available during the working period. (iii) a fully equipped first aid box in all the departments. (b) for factories employing 51 to 200 workers: (i) an Occupational Health Center having a room with a minimum floor area of 15 square metre with floors and walls made of smooth and impervious surface and with adequate illumination and ventilation as well as equipment as per the Schedule annexed to this rule ; (ii) a part time factory Medical Officer shall be in overall charge of the Center who shall visit the factory at least twice in a week and whose services shall be readily available during medical emergencies. (iii) one qualified and trained dresser-cum-compounder on duty throughout the working period ; (iv) a fully equipped first aid box in all departments. In accordance with the Factories Act 1948 Chapter IV Safety Section 45. First-aid appliances 164 [Nothing except the prescribed contents shall be kept in a first-aid box or cupboard.</p>
<p>§6</p>	<p>In Accordance with the Uttar Pradesh Factories Rules 1950 Chapter I preliminary Section 3. 3 [Approval of plans, registration of factories and grant of license (2) No manufacturing process shall be started or carried on in any building, or part of a building until a certificate of stability of the building, or part of building in Form no. 2 signed by a person possessing the qualifications prescribed in sub-rule (4) has been delivered online to the Chief Inspector and accepted by him. So extended portion of any factory shall be used as a part of the factors any time miler the extension nor any plant or machinery shall be added in any factory nor brought into use any lectors, nor brought into use an time alter such addition until a certificate in respect of such extension or plan has been delivered to the Chief Inspector and accepted by the Chief inspector. (3) The person signing the Form no shall possess the same qualifications and experience as prescribed in the Schedule to rule 2-A for this purpose. (4) No person excepts in the case of a building occupied by any Government shall be authorized to sign a certificate of stability, who is in the employment of the owner or builder of the building in respect of which the certificate is given.</p>

Site Details

Site Details			
Company Name	RACE ECO CHAIN LIMITED		
Site Name	Race Eco Chain Ltd		
GPS location (if available)	GPS Address:	Anisha Building, 56/33, Site 4, Industrial Area, Sahibabad, Ghaziabad-201010.	
	Coordinates:	28.662787041410542, 77.20090697352707	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	1. Business License: UPFA09003473 issued on 06.12.2021 for employing workers up to 50 and H.P: 50 and is valid till 31.12.2026. 2.Export import code:0501056947. 3.GST Number:09AADCA1572H1ZS. 4. Approved Building Layout Plan:1965 issued on 23.05.2023. 5. Fire NOC: UPFS / 2022 / 46935 / GZB / Ghaziabad / 3278 / DD issued on 26.03.2022 and is valid till 30.03.2025. 6. ESI ID - 35000331750000999. 7.EPF ID -KDMAL0215400000		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of Bags, Cushion cover, Curtain, Bed sheet, Duvet cover, Placemat, Runner		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility established in 1998. Total area of the facility is 501 Sq. metre, and the production area is 1107.87 sq meter. The physical address of the facility is Anisha Building, 56/33, Site 4, Industrial Area, Sahibabad, Ghaziabad-201010.Facility is 24 years old.		
Structure and number of buildings	Building Name:	Building no -01	
	Floor	Description	Remark
	Periphery	Fabric store, packing area, security room, drinking water area, toilets and assembling area	None
	First Floor	Finishing area, stitching area, cutting area and pressing area	None
	Second floor	Office, stitching area and conference room	None
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The site does not have any structural integrity issues (large cracks).		
Does the site have a structural engineer evaluation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility has not obtained the building stability certificate and same has been raised as non - compliance.		

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
Months of peak season	
Process overview	The facility involved in Bags, Cushion cover, Curtain, Bed sheet, Duvet cover, Placemat, Runner. The facility has 6 production lines are as follows: Fabric store - Cutting - Stitching - Finishing - Packing - Dispatch
What form of worker representation is there on site?	<input type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	The facility has grievance committee, Health & Safety committee and Anti - Sexual Committee.
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as no accommodation was provided by the facility.

Audit Parameters		
Time in and time out	Day 1	
	In	10:00
	Out	15:00
Audit type:	FULL_INITIAL	
Was the audit announced?	ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Mr. Manish Madan / Marketing Manager	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	Not applicable as no Union has been formed in the facility.		
<i>Reason for absence during the audit</i>	Not applicable as no Union has been formed in the facility.		
<i>Reason for absence at the closing meeting</i>	Not applicable as no Union has been formed in the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	35	0	0	0	0	0	0	35
Worker numbers - female	12	0	0	0	0	0	0	12
Total	47	0	0	0	0	0	0	47
Number of Workers interviewed - male	8	0	0	0	0	0	0	8
Number of Workers interviewed - female	2	0	0	0	0	0	0	2
Total - interviewed sample size	10	0	0	0	0	0	0	10

Nationalities Structure	
Nationality of Management	Indian
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Indian approx %: 99%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as production is same throughout the year.
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: Not Applicable

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	1 group of 4 workers
Number of individual interviews:	Male: 5 Female: 1
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	From the audit process, it was conveyed that there were no negative comments from the workers towards the factory management or on the approach of the factory Management towards the employees. Employees conveyed that the management was fair and that they were satisfied with the approach and attitude of the factory management shown towards them.
What did the workers like the most about working at this site?	Nice and clean Working Environment & Supportive Management
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	Attitude of workers is favourable towards the working hours in the facility.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
10 workers were selected for interview, they were interviewed as 01 groups of 04 employees and balance 06 workers were interviewed individually. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management
Attitude of worker's committee/union reps:
Worker representative know the roles and responsibility and he understand that he is the bridge between management and workers. Worker representative found no difficulty to raise any issue with management and according to him management is responsive on all the issue raised by the workers
Attitude of managers:
Managers were co-operative during the audit. Further, they were receptive to the observations during the audit and showed commitment to improve the working conditions. They assure to identify the root cause of the non compliances and implement the corrective actions at earliest. Also, no access was denied for any area in the facility by the management.

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

0A: Compliance Requirements

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
- 0.A.3 Businesses shall identify their stakeholders and salient issues.
- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

- Facility has maintained all policy and displayed all the Policies such as No Child Labour Policy & Abuse Policy, recruitment Policy, Anti Forced Labour Policy, Environmental health and safety Policy, Environment Policy and Freedom of Association Policy.
- Mr. Manish Madan - Marketing Manager is responsible person for compliance with the code.
- Facility has established a policy endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties, including its own suppliers.
- Facility has identified their stakeholders and salient issues.

Evidence examined:

- Human rights Policies
- Training records
- Interview with management and workers

Any other comments:

Nil

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has established policies and procedures pertaining to the human rights.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, the policies are included in the worker's manual.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The director is the designated person responsible for implementing standards concerning Human Rights

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Business has transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have established and implemented the data privacy procedure for workers information. The data is only accessible to authorized personnel and no other person can access the date without the permission of the authorized personnel. It is placed in locked filing cabinet.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 0.0% This year 0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	0.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 4.0% This year 5.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	0.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has maintained the accident register.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

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

OB: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Mr. Manish Madan - Marketing Manager is responsible person for compliance with the code.
- Based on the review of records and interaction with management facility has communicated the ETI base code to their workers and with suppliers as well.
- It has been verified by reviewing the records that facility has obtained the legally required business licenses and permissions.
- The facility has conducted the last two ETI training on 01.12.2023 and 02.09.2023.
- The factory has obtained factory license no: UPFA09003473 issued on 06.12.2021 for employing workers up to 50 and H.P: 50 and is valid till 31.12.2026.

Evidence examined:

All policy & Procedure of Factory
Workers Interview and management interaction
All required legally required licenses and agreement.

Any other comments:

Nil

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such fine imposed on the site till date and has been checked via internet.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has developed the policies and procedure with respect to social compliance. Appointment made as per skill and not by any other reasons of discrimination and effective steps taken to avoid the harassment & abuse at all levels by proper training, after checking valid government for age proof.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	On the day of assessment, no traces of forced labor, child labor, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The facility conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.

<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All the employees will be undergone an induction training where the social compliance policies and procedures were explained.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Based on document review and audit process it was noted that factory has provided ETI Code of Conduct training on dated 01.12.2023 and 02.09.2023.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No, the site does not have any internationally recognized system certifications.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Factory has a separate human resource department. Mr. Manish Madan - Marketing Manager is the designated person for the department.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Mr. Manish Madan - Marketing Manager is responsible for implementing the code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has maintained a policy for ensuring worker information confidentiality.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has procedure to ensure confidential information is kept confidential.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory has conducted the risk assessment to evaluate policy and procedure effectiveness. The last risk assessment was conducted on 22.11.2023.</p>
<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility conducts training and maintains policies and procedures for the issues found while conducting the risk assessment in the facility.</p>

<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Based on document review and interaction with the management that factory has communicated the ETI Code of Conduct policy to its suppliers.</p>
<p>Land Rights</p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has land rights licenses and permissions. Factory runs their operation in own building and obtained all legally required land rights licenses from different department and made available during the audit.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Partners of the company is taking care all legal law & practices related to Land and periodically reviewing the law and update as well for this site.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory adhered all necessary approval as per law and local law is very strong in related to land rights.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Landowner document has been submitted for review and factory obtained prior government approval to build factory.</p>
<p>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</p> <p>Please give details:</p> <p>Factory building was declared to operate their production process by legal authority.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No illegal appropriation of land for facility building or expansion of footprint was found during the audit.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600291367	
Clause	0B - Management Systems and code Implementation	
Issue Title	30 - No / inadequate system for management to keep up-to-date with local and national laws and regulations	
Subcategory	Site's Awareness of Code/Legal Requirements	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the Uttar Pradesh Factories Rules 1950, Chapter XI Supplemental, Section 118 – Display of notices, The abstract of the Act and the rules required by Section 108(1) to be displayed in every factory shall be in the prescribed Form No. 20.	
ETI code	O.B.1 - Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Explanation to the non compliance	It was noted during the factory tour that the factory has not displayed the law abstracts at a conspicuous place in the factory.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to the factory to display the law abstracts in the factory.	

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The factory has a policy which prohibits forced labor, and this was available for review.
- Mr. Premal Shah - Director is responsible for management of this standard.
- Factory had established Grievance Committee, Health & safety Committee and anti-sexual harassment committee.
- The factory management has provided Suggestion Boxes for the workers to lodge in their complaints / grievances or share their suggestions.
- The factory management has also adopted an Open-Door Policy wherein the worker can directly put across their suggestions or their grievances or share their views to the Top Management.
- Works and other committee employee representatives are not discriminated, and they are free to carry out their functions like meetings on periodical basis

Evidence examined:

- Personal files: Verified Appointment Letter of 10 out of 10 selected samples and Payroll records.
- Based on employees' interview, the facility does not require any deposit or deposit of employee's identification such as education certificates, passport etc.,
- Based on employee's interview, the facility does not limit/restrict the employee's movement/freedom in any way.
- Based on the facility tour and interview with employees, there are no evidence of involuntary labour.
- Based on employee's interview, all are free to leave their employment by giving reasonable notice.

Any other comments:

Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: It was observed that workers have no restrictions on terminating the employment, also factory has a policy for freely chosen employment for workers.

<p>If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: Factory does not fall under that standard to follow with it.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Workers are free to leave the site after their shift gets over.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details: Yes, the site understands the risk of forced / trafficked / bonded labour in its supply chain and has system to prevent such issues in the facility.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory is taking steps to reduce the risk of forced/trafficked labor. There is no forced or trafficked labor found in the factory.</p>

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

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Factory had established the Grievance committee, health and safety committee and anti-sexual harassment committee and the meetings are conducted periodically with concerned members.
- The factory management has provided number of Suggestion Boxes for the workers to lodge in their complaints / grievances or share their suggestions.
- The factory management has also adopted an Open-door Policy wherein the worker can directly put across their suggestions or their grievances or share their views to the Top Management.
- Workers are free to join and from Union.
- Facility has not formed any Union in the facility
- Grievance and other committee employee representatives are not discriminated, and they are free to carry out their functions like meetings on periodical basis.

Evidence examined:

- Facility Policy and Procedures.
- Facility has grievance redressal procedure also provided suggestion / complaint boxes.
- Grievance Committee last meeting was conducted on 01.12.2023
- Health & Safety committee meeting was last conducted on 01.12.2023
- Anti - sexual harassment committee meeting was last conducted on 01.12.2023.
- Interaction with Management and worker's interview.

Any other comments:

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other <input type="checkbox"/> None
Other details:	Facility has maintained grievance committee, health and safety committee and anti - sexual harassment committee.
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has maintained grievance committee, health and safety committee and anti - sexual harassment committee. Further the factory management has also adopted an Open-door Policy wherein the worker can directly put across their suggestions or their grievances or share their views to the Top Management.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on the interaction with workers representative, it was noted that facility has provided all relevant facilities to conduct committee related activities.
Name of union and union representative, if applicable:	Not Applicable
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Grievance committee is present at the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, all workers were aware of who their representatives are.
Were worker representatives freely elected?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Date of last election:	null
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The facility has established grievance committee, and the last meeting was conducted on 01.12.2023.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

3: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Mr. Manish Madan - Marketing Manager the responsible person to ensure the Health & Safety of the Work Environment.
- The facility has maintained health and safety committee, and the last meetings was conducted on 01.12.2023.
- The facility has conducted Health & safety training conducted on 30.09.2023.
- Health & Safety risk assessment conducted on 22.11.2023.
- The Facility management has provided male toilets - 02, female toilets - 02, Drinking water point- 02 and hand wash point- 02.

General requirements:

- Facility has maintained accident register
- Last PPE trainings were conducted on 01.12.2023 and 02.09.2023
- Food hygiene certificate: 10019043002404 Issued on: 03.02.2022 and valid till: 17.01.2025
- Health check-up of workers conducted on 14.12.2023 from Vasundhara Hospital
- Drinking water test report, no: ETS / 1557 / 01 / 2023 issued on 24.01.2023 by Enviro-Tech Services
- Air quality test report no: ETS / 1553, 4 / 01 / 2023 issued on 24.01.2023 by Enviro-Tech Services
- Noise monitoring test report no: ETS / 1555, 6 / 01 / 2023 issued on 24.01.2023 by Enviro-Tech Services
- LUX Monitoring test report no: ETS / 1558, 9 / 01 / 2023 issued on 24.01.2023 by Enviro-Tech Services.

Fire Safety:

- The facility has conducted firefighting training on 04.12.2023 from Worksafe foundation.
- Fire drills conducted on 04.12.2023, 04.09.2023, 06.06.2023 and the time taken was 120 seconds, 73 seconds and 113 seconds respectively.
- Fire Noc no: UPFS / 2022 / 46935 / GZB / Ghaziabad / 3278 / DD issued on 26.03.2022 and is valid till 30.03.2025.
- The Facility has provided Fire Extinguishers - 15, Emergency exit - 05, Main exit - 05, Smoke Detectors - 27, Fire Alarm -05, UPS connected lights -10, Emergency lights -10, Modular Sprinkler - 08 and Hose Reel - 07.

Electrical Safety:

- All electrical equipment's were in good condition such as sockets, plugs, switches and main fuse boards.

Medical Services:


- The Facility management has provided 05 First Aid Boxes in the facility.
- The facility has conducted first aid training on 08.11.2023 from St. John's Ambulance for 05 workers.


Evidence examined:


<ul style="list-style-type: none"> • The factory has a well-documented policy on Health & Safety • Weekly inspection of fire equipment's was done internally. • Fire NOC certificate • First aid training certificate obtained on - 08.11.2023 for 05 workers. • Drinking water inspection records obtained on - 24.01.2023.
Any other comments:
Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted from the review of the record that the factory has Health and Safety policies and procedures. The factory has conducted the health and safety training to their employees.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All policies were covered in induction training and the factory has provided the worker's handbook to all the employees.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No, structural additions without required permits and/or inspections were done. Facility has obtained the layout plan as per the current setup of the facility.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Visitors to the site informed on H&S and provide with personal protective equipment.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable but first aid boxes were provided in the facility.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, the facility has 05 first aid trainers.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No, transport facility provided to workers as all workers came from nearby localities.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Worker is not provided dormitory (living space) facility, thus not applicable.


<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility has conducted H&S Risk assessments on 22.11.2023.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Environmental aspect impact analysis has been conducted and all the required documents were present at the time of the audit.</p>
<p>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</p> <p>Please give details: Organization is aware about requirements & follows the same. They do get updates from customers from time to time. Required information is also submitted to client when ever asked.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600291368	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	190 - No fire fighting equipment signage / labelling / instructions	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the Factories Acts 1948, Chapter IV Safety, Section 38 – Precautions in case of fire, (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain— (b) the necessary equipment and facilities for extinguishing fire.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted during the factory tour that no operating instructions have been displayed near the firefighting equipment installed in the factory.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to the factory to display the operating instructions near the firefighting equipment installed in the factory.	
		 <p>NC 02 - Health & Safety - <u>Operating instructions not displayed.JPG</u></p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600291369	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	184 - Fire fighting equipment is locked or otherwise not accessible at all times	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In Accordance with the Uttar Pradesh Factories Rules 1950 Chapter IV Safety Section61. Fire (11) First-aid firefighting arrangements (f) All first-aid firefighting equipments shall be placed in a conspicuous position and shall be readily and easily accessible for immediate use. Generally, these equipments shall be placed as near as possible to the exits or stair landing of normal routes of escape.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted during the factory tour that 01 hose reel at ground floor was found to be blocked by material.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to the factory to not let any fire equipment get blocked by material.	
		 <p>NC 03 - Health and safety - Hose reel found blocked.JPG</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600291370	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels	
Subcategory	Electrical risk	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>In accordance with the Indian Electricity Rules, 1956, Section – 36. Handling of electric supply lines and apparatus- (1) Before any conductor or apparatus is handled adequate precautions shall be taken, by earthing or other suitable means, to discharge electrically such conductor or apparatus, and any adjacent conductor or apparatus if there is danger there from, and to prevent any conductor or apparatus from being accidentally or inadvertently electrically charged when persons are working thereon. Every person who is working on an electric supply line or apparatus or both shall be provided with tools and devices such as gloves, rubber shoes, safety belts, ladders, earthing devices, helmets, line testers, hand lines and the like for protecting him from mechanical and electrical injury. Such tools and devices shall always be maintained in sound and efficient working conditions: (2) No person shall work on any live electric supply line or apparatus and no person shall assist such person on such work, unless he is authorised in that behalf, and takes the safety measures approved by the Inspector. (3) Every telecommunication line on supports carrying a high or extra-high voltage line shall, for the purpose of working thereon, be deemed to be a high voltage line.</p>	
ETI code	<p>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	
		 <p><u>NC 04 - Health and safety - No rubber mat near the DG Set area.JPG</u></p>

Explanation to the non compliance	It was noted during the factory tour that no rubber mat was provided near the PNG set placed in the factory.			
Follow up method	<input type="checkbox"/> Follow up audit	<input checked="" type="checkbox"/> Desktop audit		
Timescale	<input type="checkbox"/> Immediate	<input checked="" type="checkbox"/> 30 days	<input type="checkbox"/> 60 days	
	<input type="checkbox"/> 90 days	<input type="checkbox"/> 120 days	<input type="checkbox"/> 180 days	
	<input type="checkbox"/> 365 days	<input type="checkbox"/> Other		
Actions	It is recommended to the factory to provide rubber mat near the PNG Set area in the factory.			

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600291371	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	289 - First aid box available but contents are missing / contents out of date or otherwise inadequate	
Subcategory	First Aid / Accidents	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>In accordance with the Uttar Pradesh Factories Rules 1950, Chapter IV A Provisions relating to Hazardous Process, Section 63 J – Occupational Health Centres, (1) In respect of any factory carrying on 'hazardous process' there shall be provide and maintained in good order an occupational Health Center with the services and facilities as per scale laid down hereunder: (a) for factories employing up to 50 workers: (i) the services of a Factory Medical Officer on retainer ship basis in his clinic to be notified by the occupier. He will carry out pre-employment and periodical medical examinations as stipulated in rule 63-I and render medical assistance during an emergency. (ii) a minimum of 5 persons trained in first aid procedures of whom at least one shall always be available during the working period. (iii) a fully equipped first aid box in all the departments. (b) for factories employing 51 to 200 workers: (i) an Occupational Health Center having a room with a minimum floor area of 15 square metre with floors and walls made of smooth and impervious surface and with adequate illumination and ventilation as well as equipment as per the Schedule annexed to this rule ; (ii) a part time factory Medical Officer shall be in overall charge of the Center who shall visit the factory at least twice in a week and whose services shall be readily available during medical emergencies. (iii) one qualified and trained dresser-cum-compounder on duty throughout the working period ; (iv) a fully equipped first aid box in all departments. In accordance with the Factories Act 1948Chapter IV Safety Section 45.First-aid appliances 164[Nothing except the prescribed contents shall be kept in a first-aid box or cupboard.</p>	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing	<p><u>NC 05 - Health & Safety - First box not fully equipped & no content list is displayed.JPG</u></p>

	knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted during the factory tour that 01 out of 05 first aid box found was not fully equipped and no content list was displayed near 05 out of 05 first-aid boxes maintained in the factory.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended to the factory to maintain fully equipped first-aid boxes with content list displayed near them.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600291372	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	250 - No or inadequate assessment / certificates / report / licence in place for structural safety of building including building stability certificate	
Subcategory	Building/Site Maintenance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>In Accordance with the Uttar Pradesh Factories Rules 1950 Chapter I preliminary Section 3. 3[Approval of plans, registration of factories and grant of license (2) No manufacturing process shall be started or carried on in any building, or part of a building until a certificate of stability of the building, or part of building in Form no. 2 signed by a person possessing the qualifications prescribed in sub-rule (4) has been delivered online to the chief Inspector and accepted by him. So extended portion of any factory shall be used as a part of the factory any time miler the extension nor any plant or machinery shall be added in any factory nor brought into use any lectors. nor brought into use an time alter such addition until a certificate in respect of such extension or plan has been delivered to the Chief Inspector and accepted by the Chief inspector. (3) The person signing the Form no shall possess the same qualifications and experience as prescribed in the Schedule to rule 2-A for this purpose. (4) No person excepts in the case of a building occupied by any Government shall be authorized to sign a certificate of stability, who is in the employment of the owner or builder of the building in respect of which the certificate is given.</p>	
ETI code	<p>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p>	

Explanation to the non compliance	It was noted during the documents review and interaction with the management that the stability certificate was not evident at the time of the audit.			
Follow up method	<input type="checkbox"/> Follow up audit	<input checked="" type="checkbox"/> Desktop audit		
Timescale	<input type="checkbox"/> Immediate	<input checked="" type="checkbox"/> 30 days	<input type="checkbox"/> 60 days	
	<input type="checkbox"/> 90 days	<input type="checkbox"/> 120 days	<input type="checkbox"/> 180 days	
	<input type="checkbox"/> 365 days	<input type="checkbox"/> Other		
Actions	It is recommended to the factory to make the stability certificate evident at the time of the audit.			

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

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The factory has a policy which prohibits Child and forced labor and this was available for review.
- Factory had established child labor remediation policy.
- Mr. Manish Madan - Marketing Manager is responsible for management of this standard.
- From factory tour, Management interaction and audit process there was no evidence of Child labor in the factory.
- Factory verifies the age of workers at the time of recruitment by physical appearance and government ids such as Aadhar Card, Voter Id, School Leaving Certificate, Dental Certificate, Passport etc
- Factory has maintained age proof records for 10 out of 10 sampled workers.

Evidence examined:

- Personal files, management interaction and worker's interview
- Physical appearance of the worker

Any other comments:

Nil

Legal age of employment:	15
Age of youngest worker found:	23
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as no young workers have been employed at the facility.

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The local minimum wages applicable in Uttar Pradesh with effect from 30/09/2023

- Unskilled Labour – INR 10275
- Semi-Skilled Labour – INR 11303
- Skilled Labour – INR 12551
- Employees stated that they had received the Wages on or before 07th of the following month through 100% by bank transfer.
 - All employees received pay slips for the month of July 2023, January 2023 and November 2023.
 - Wage records, pay slips and account statements were evident at the time of the audit and the wages were verified.
 - Wages, in/out time and attendance record of 10 employees for the month of Recent month November 2023, Random month July 2023 and Random month January 2023 were available for review at the time of audit.
 - Based on employee's interview and record review, all the employees have received appointment letter in local language.
 - Company employees are paid legal benefits such as Annual bonus and annual leaves as per law. Annual bonuses are paid once in year through bank transfer. Annual leave is paid along with the salary as per law.

Evidence examined:

- Document Review
- Employee Interview
- Local & National Laws
- Wage & Benefit Policy
- Time records
- Legal State Minimum Wages Notification
- Wage records, pay slips and account statements

Any other comments:

Nil

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO

Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 395.0 Per Week: null Per Month: 10275.0	Actual Per Day: 461.0 Per Week: 2769.0 Per Month: 12000.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 790.0 Per Week: 4743.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 Samples from recent month of November 2023 10 Samples from random month of September 2023 10 Samples from random month of April 2023		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The local minimum wages applicable in Uttar Pradesh with effect from 30/09/2023 •Unskilled Labour – INR 10275 •Semi-Skilled Labour – INR 11303 •Skilled Labour – INR 12551		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	The lowest minimum wages for the recent month of November is INR 12000		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Bonus was paid at the rate of 8.33% on monthly basis. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social Insurance such as employee provident fund, employee state insurance are the deductions made by the facility.		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	01. EPF at the rate of 12% 02. ESI at the rate of 0.75%		
Please list all deductions that have not been made.	Nil		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, records reflect all time worked during committee meeting and all training.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Wages are reviewed periodically after every 6 months as per the govt minimum wage notification.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes, equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

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

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- Factory uses manual register for all employees and records were evident at the time of the audit.
- The factory runs in general shift from 09:0 AM to 06:00 PM.
- The factory has provided Lunch break of 60 minutes for 01:00 PM To 02:00 PM & tea break is given between work
- Weekly off is given to all employees on Sunday.
- A total of 10 employees were interviewed for the month of November 2023, July 2023 and January 2023
- The working hours have been defined by the contract and do not exceed 48 hours.
- Overtime is voluntary in the facility and if done then is given at a premium of 200%

Evidence examined:

- Time records
- Production records
- Personal files

Any other comments:

Nil

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Manual
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	10 Samples from recent month of November 2023 and over time checked on weekly, monthly & quarterly found under control as per local norms. 10 Samples from random month of July 2023 and over time checked on weekly, monthly & quarterly found under control as per local norms. 10 Samples from random month of January 2023 and over time checked on weekly, monthly & quarterly found under control as per local norms.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as combined hours were not found above 60.
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Workers are never forced to do overtime in the factory as per the interview of workers and attendance records of the facility. In and out time records and production records were checked as evidence to confirm the same.
Overtime premium	

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

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- From review of documentation and interviews with employees, there was no case of discrimination based on gender, religion etc. in hiring, compensation, access to training, promotion, termination, or retirement.
- Facility had provided suggestion box, which is opened on regular basis.
- The factory provides equal access to employment as well as equal pay for equal work.

Evidence examined:

- Documented policy on discrimination.
- Interaction with the employees.
- Hiring procedure, compensation, training procedure, promotion policy and termination policy

Any other comments:

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 75.0%	Female: 25.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	02	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement
	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found	
Please give details	No evidence found of discrimination based on race, caste, national, Origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.	
Professional Development		
What type of training and development are available for workers?	Facility has various trainings and development programs like technical trainings, etc. is available for workers.	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

- Factory has maintained employees personal file with required documents, provided appointment letters to 10 out of 10 selected sample employees in local language.
- Factory has established procedure to identify and monitor the hiring and recruitment process periodically.
- Factory has not charged any recruitment fee at any stage of the recruitment process

Evidence examined:

- Personal Files of Employees
- Hiring and termination policy

Any other comments:

Nil

Responsible Recruitment

All Workers

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

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

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

- Yes No

Migrant Workers

Type of work undertaken by migrant workers:

Not applicable as no migrant workers have been employed at the facility.

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as no migrant workers have been employed at the facility.
Is there any observation on this finding?	Not applicable as no migrant workers have been employed at the facility.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable as no agencies workers have been employed at the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as no agencies workers have been employed at the facility.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as no agencies workers have been employed at the facility.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as no contractual workers have been employed at the facility.

Do all contractor workers understand their terms of employment?

Yes No

Please give details:

Not applicable as no contractual workers have been employed at the facility.

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

8A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- Based on interaction with the facility management and employees' interview, it is noted that the facility not using any subcontractors for their production process.
- Facility is not using any home workers.

Evidence examined:

- Facility Policy.
- Inward and outward material register.
- Production records.
- Interaction with management

Any other comments:

Nil

Summary of sub-contracting – if applicable

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

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]

9: Compliance Requirements

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.

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

- Through the interaction with the facility management and employees' interview, it was confirmed that there is no case of harsh, inhumane treatment or abuse of the employees.
- Suggestion box is present in the facility for reporting grievances confidentially.
- Anti - sexual harassment Committee meeting was conducted on 01.12.2023.

Evidence examined:

- Anti-sexual harassment Policies and Procedures
- Interaction with management and employees

Any other comments:

Nil

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility provided suggestion box for reporting any grievance, complaint & suggestion anonymously also have open channel to meet with top management for any grievance, complaint & suggestion.
If yes, are workers aware of these channels and have access? Please give details.	Yes, all workers are aware about the process.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box and Grievances committee
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other
Please provide grievance mechanism details	Grievance committee, Health & Safety committee and anti-sexual harassment committee is present in the facility along with suggestion boxes.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

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

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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The workers working in the factory are Indian nationals.
- The Factory has taken copies of all relevant identification documents from all workers and maintains the same in their personal files.
- It was noted through review of documents, interview with the employees and interaction with the factory management that facility employs workers from nearby areas.
- The factory has well laid down procedure of hiring new employees whether direct.
- All records submitted by the employee are checked by personal department.
- The tour of the factory, & interview with the employees did not show any evidence of prison labor in the facility

Evidence examined:

- Personal Records of employee
- Hiring Policy
- Interaction with the management and employees

Any other comments:

Nil

10B2 - Environment 2-Pillar
[Summary of Findings]

10B2: Compliance Requirements

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

10.B2.2 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:

The facility has established and maintained environmental policy Mr. Manish Madnan - Marketing Manager is responsible for environmental aspects.

- Based on management interaction, facility and their suppliers are aware the environmental requirements.
- Facility has documented environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- Facility has conducted environment impact assessment.
- Facility is measuring use of natural resource like water, diesel and have target to reduce.
- Facility is working continuously to reduce use of natural resources to improve in their environmental performance.
- Air consent no: 134284 / UPPCB / Ghaziabad (UPPCBRO) / CTO / Air / Ghaziabad / 2021 issued on 15.09.2021 by Uttar Pradesh Pollution Control Board and is valid till 31.07.2024.
- Water consent no: 144282 / UPPCB / Ghaziabad (UPPCBRO) / CTO / water / Ghaziabad / 2021 issued on 15.09.2021 by Uttar Pradesh Pollution Control Board and is valid till 31.07.2024
- Hazardous waste disposal agreement with Nav Prabhat Foundation made in 12.12.2023 for all e-waste and electrical items and is valid till 01 year from the date of issue.
- The facility has conducted Environmental awareness training on 01.12.2023.

Evidence examined:

- Facility Policy on environmental compliance.
- Interaction with management and Employees.
- Environment monitoring record
- Legal and valid environment permits.
- Electricity Bills.
- Facility Tour.
- Water bills

Any other comments:

Nil

Attachments



19. Cutting Area.JPG



17. Drinking water point.JPG



21. Stiching Area.JPG



20. Fabric Store.JPG



10. Emergency lights.JPG



02. Facility Overview.JPG



04. ETI code of Conduct.JPG



14. Smoke Detector.JPG



09. Evacuation Map.JPG



11. Fire Extinguisher.JPG



07. Fire Alarm.JPG



15. Aisle Marking.JPG



12. Fire Hose Reel.JPG



06. Fire alarm control Panel.JPG



03. Facility Policies and Procedures.JPG



05. Employee Notice Board.JPG



08. Fire alarm call point.JPG



18. Toilet.JPG



13. Modular Sprinkler.JPG



16. First Aid box.JPG



01. Facility name Board.JPG



2318Race Eco Chain Limited - Sedex 2-Pillar - Signed CAPR - 22.12.2.pdf



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:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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