

# Sedex Members Ethical Trade Audit Report





	Audit Details								
Sedex Company Reference: (only available on Sedex System)	ZC403248544		Sedex Site Re (only available System)		ZS403249543				
Business name (Company name):	India International	House	e Limited						
Site name:	India International	House	e Limited						
Site address: (Please include full address)	A-6/1 &2, Site IV, Sahibabad Industrial Area, Ghaziabad- 201005, Uttar Pradesh		Country:		India				
Site contact and job title:	Mr. Brajesh Pacho	duri, F	actory Man	ager					
Site phone:	+91 9911319309		Site e-mail:		a6@s	kggroup.com			
SMETA Audit Pillars:	□ Labour      Standards	Safe	lealth & hty (plus ronment 2- r)	Environn 4-pillar	nent	⊠ Business Ethics			
Date of Audit:	06.03.2023								

Audit Company Name & Logo:	
dqs	Report Owner (payer): India International House Limited
-	

	Audit Conducted By										
Affiliate Audit Company		Purchaser		Retailer							
Brand owner		NGO		Trade Union							
Multi– stakeholder			Combined Audit	select all that appl	y)						

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact <a href="mailto:grievance@sedex.com">grievance@sedex.com</a>.

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



# **Audit Content:**

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

# 2-Pillar SMETA Audit

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

## **4-Pillar SMETA**

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



# **SMETA Declaration**

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

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

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

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

Lead auditor: Kaushik Laha APSCA number: RA 2170151

Lead auditor APSCA status: RA

Team auditor: Anil Chaudhary APSCA number: ASCA 21705147 Interviewers: Anil Chaudhary APSCA number: ASCA 21705147

Report writer: Kaushik Laha

Report reviewer: Praveen Yadav

Date of declaration: 06.03.2023

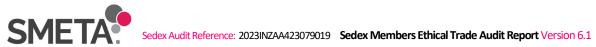
Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

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



# **Summary of Findings**

to the	Issue use click on the issue title to go direct e appropriate audit results by clause)	Area of Non–Conformity (Only check box when there is a non-conformity, and only in the box/es where non–conformity can be found)			non– where the	Record the numb			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	o auditor, please ensure that when issuing e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP								None-Observed
ОВ	Management systems and code implementation					3	1		The ETI code of conduct training is not effective.     There is no social risk assessment done     There is no internal audit done based of the ETI code of conduct  Observation  There is no evidence of the supplier audit being done based on the ETI code of conduct
1.	Freely chosen Employment					1			Non-Compliance     The background verification of the employees is not done



2	Freedom of Association			1	<ul> <li>Non-Compliance</li> <li>The worker representative election is not done for the last two years</li> <li>The worker committee is not done every 3 months in 2022</li> </ul>
3	Safety and Hygienic Conditions			7	<ul> <li>First aid training has been expired on 07/05/2022.</li> <li>Hydro static test not conducted for 5 compressors.</li> <li>Fire alarm control panel not provided inside the facility.</li> <li>Facility has not provided hand protection &amp; mask to polishing and plating employees. Eye protection, Head protection &amp; apron to spray employees.</li> <li>2 out of 4 Emergency exit light found in non-functional condition.</li> <li>Locking devices not provided in 1 of 3 rolling shutters.</li> <li>Electric board found in open condition in chemical cleaning area and loos wire found in finishing sections.</li> </ul>
4	Child Labour				None-Observed
5	Living Wages and Benefits				None-Observed
6	Working Hours				None-Observed

SM	ETA
<b>DIVI</b>	E IA.

7	<u>Discrimination</u>					None-Observed
8	Regular Employment					None-Observed
8A	Sub-Contracting and Homeworking					None-Observed
9	Harsh or Inhumane Treatment					None-Observed
10A	Entitlement to Work					None-Observed
10B2	Environment 2-Pillar					NA
10B4	Environment 4–Pillar					None-Observed
10C	Business Ethics					None-Observed
Cana	ral alasan rations and armanaur, of t	ha sita.				

General observations and summary of the site:

This periodic audit was conducted by DQS India. There was 02 auditors, who assessed the facility's Operations in 1 days. (2 Auditor for 1 days 1.5 Mandays). The scope of this audit was based on 4 Pillar SMETA systems. Auditor entered the facility at 0910 am on March 6th 2023 and conducted an opening meeting with facility management according to the ETI Base Code. Mr. Abhishesk Gupta, MD, Mr. Brajesh Pauchari, MR. Mr. Himanshu, HSE and HR, Mr. ram Prakash WR were present. Factory Manager was assured full co-operation to this audit. The products manufactured at this site are Builders' hardware. Overall responsibility for meeting the standards is taken by Mr. Brajesh Pachauri • There are a total of 49 employees on site, which includes 24 production employees (1 female and rest male). The youngest worker on site is 19 years old. • There is no union at this factory. • Worker committee is framed in the facility. 1 works committee member was present at closing meeting. • The facility is not using any subcontractor. • 10 workers were selected for interview they were interviewed as 1 group of 4 workers and the balance of 6 workers was interviewed individually. • All workers said they were satisfied with their employment at the factory. • They also said they were able to make suggestions to their supervisors and sometimes they had seen these suggestions used. • 10 Records to show wages and hours were taken for 3 months randomly selected from the period March 2022 to January 2023. • Standard hours on site were on average 8.30 hours/month with 1 day off in every 7-day-period. • Legal minimum wage is paid to all employees; legal minimum wage is Unskilled - 9743/ Semi skilled – 10717 INR / Skilled -12005 / per month from 01-10-2022 (Notification date 30-09-2022. • No Overtime hours were observed in the sampled month of march 2022, August 2022 & January 2023. Further noted during review of wages that, overtime hours were compensated at 200% of ordinary rate of wages. • Correct wages paid to the employees in all the sampled months. Facility works in one General shift for permanent and contractual employees except security employees who work in 1 shift. Shift Details:- 08:30 A.M. to 17:30 P.M. / Lunch break 12:30 P.M. to 13:30 P.M. Facility has a Fixed Weekly off for all permanent employees i.e. on Sunday and staggered weekly rest for security (contractual) employees. • Employees' wages are calculated on monthly



basis and paid on or before 07th of each month. Time records are maintained in the form of manual Impression for permanent employees, where employees records and acknowledged their time records in their respective time sheets.

#### Positive Observations:

- 1. Management approach towards this audit was very positive and they assured necessary steps to improve labor Standard in their facility.
- 2. There is no evidence of child and forced labour.
- 3. There is no evidence of discrimination, harassment and abuse or unfair disciplinary practices.
- 4. Facility treats their employees with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal

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



# **Site Details**

	Site Det	ails						
A: Company Name:	India International H	ouse Limited						
B: Site name:	India International House Limited							
C: GPS location: (If available)	GPS Address:	GPS Address: Latitude: 28.6609° N Longitude: 77.3411° E						
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory license UPFA9000689 dated 8.11.2019 valid till 31.12.2024 for 250 employees and 500 H.P.  Fire NOC UPFS/2021/37421/Gzb/Ghazaibad/2655/CFO dated 23.9.2021 valid till 22.9.2024  Air consent 146791/UPPCB/Ghaziabad(UPPCBRO)/CTO/air/Ghazaibad/2021 dated 1.2.2022 valid 31.12.2026  Water consent 146792/UPPCB/Ghaziabad(UPPCBRO)/CTO/water/Ghaziabad/2021 dated 17.1.2022 valid 31.12.2026  Hazardous waste storage Consent 17155/UPPCB/Ghaziabad(UPPCBRO)/HWM/Ghaziabad/2022 dated 28.4.2022 for Cat 33.2, 35.3, 5.1Valid till 27.4.2027  Consent to operate DG and Transformer 250 KVA at 11 KV , T/F 1 X 315 KVA, 11/0.433 KV an 2X 250 KVA dated 7.7.2018 valid for three years.							
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacture of ferrous and Non-Ferrous Products for Hardware Items							
F: Site description:								
(Include size, location, and age of site. Also, include	Production Building no	Description	Remo	ark, if any				
structure and number of	Building 1	Office, Cant	een None	)				
buildings)	Building 2	Security, Sto Electric pane	el.	}				
	Building 3	Utility section	n None					
	Building 4	Forging> Trimming, Machining, Polishing, Plating, Inspection, Packing	None					
	Is this a shared building?	No	None	!				



	The organisation started in the year in the year 1976. The total area is 58310 sq ft , the covered area is 26239.5 sq ft. There are three blocks of single storied buildings. The nearest airport is 38 kms . The capacity of the plant 30 Ton per month. Present running is 25 ton.
	For below, please add any extra rows if appropriate.
	F1: Visible structural integrity issues (large cracks) observed?  Yes  No F2: Please give details: There are no cracks
	F3: Does the site have a structural engineer evaluation?  Yes  No
	F4: Please give details: The building stability certificate vide Form 2 done by Er. Prakash Verma dated 10.4.2017
G: Site function:	☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
H: Month(s) of peak season: (if applicable)	All through
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Brass Rod> Cutting>Forging> trimming> Machining> Lancering> Polishing>cleaning> Plating> Laquering> Inspection> packing> despatch `The list of machines are Forging Machines - 6 from 50 T to 400 Ton , Milling Machine - 1, Drilling machine - 2, lathe Machine - 2, Shaper machine- 1 , Surface Grinder-1, Tool Grinder - 1, Electrical Discharge Machines- 2, Power Press - 12 from 10 T to 150 T, Lathe Machine - 10 , Milling Machine - 3, Drilling Machine - 11, Hand Press - 1, Tapping - 3, Tool Grinder Machine - 2., Lancering machine - 10, Polishing machine - 23, Plating - 4 lines, Laquering - 1 line, DG set 2X250 KVA, Transformer - 1 11 KV, ETP Plant, Compressor- 4, There are 1 forging line, Press shop line- 2, Machining- 1, Lancering - 1, Polishing line- 4, Plating 3, lacquering - 2
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (specify)



	None
K: Is there any night production work at the site?	☐ Yes ☐ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers Factory has not provided any offsite worker accommodation buildings e.g. dormitories & all workers comes from nearby areas from their respective homes.
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details NA
	Yes No N1: If no, please give details NA



Audit Parameters									
A: Time in and time out	A1: Day 1 Tir A2: Day 1 Tir 16:30								
B: Number of auditor days used:	1.5 Man Day	ys							
C: Audit type:	Partial Fo Partial Ot								
D: Was the audit announced?	Semi – ar	□ Announced     □ Semi – announced: Window detail: weeks     □ Unannounced							
E: Was the Sedex SAQ available for review?	Yes No E1: If No, wh								
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	Yes No If <b>Yes</b> , please capture detail in appropriate audit by clause								
G: Who signed and agreed CAPR (Name and job title)	Mr. Brajesh	Mr. Brajesh Pachauri, Factory manager							
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☐ No								
I: Previous audit date:	9.7.2020								
J: Previous audit type:	Initial								
K: Were any previous audits reviewed for this audit	⊠ Yes □ N								
Audit attendance		Managemer	nt	Worker Represer	ntativ	/es			
		Senior manageme	nt	Worker Committee representatives	ee	Union representatives			



A: Present at the opening meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No	
B: Present at the audit?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No	
C: Present at the closing meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No	
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	NA						
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade Union						



# **Worker Analysis**

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national 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*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	10.0.
Worker numbers – Male	49	0	0	0	0	0	0	49
Worker numbers – female	1	0	0	0	0	0	0	1
Total	49	0	0	0	0	0	0	49
Number of Workers interviewed – male	09	0	0	0	0	0	0	09
Number of Workers interviewed – female	1	0	0	0	0	0	0	1
Total – interviewed sample size	10	0	0	0	0	0	0	10



A: Nationality of Management	Indian			
B: Please list the nationalities of all workers, with the three most common nationalities listed first.  Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1:Indian	Was the list completed during peak season?  ☐ Yes ☐ No  If no, please describe how this may vary during peak periods:		
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 _Indian			
D: Worker remuneration (management information)  D2:100% salaried workers  Payment cycle: D5:100% monthly paid				



**Worker Interview Summary** A: Were workers aware of the audit? Yes  $\bowtie$  No Yes B: Were workers aware of the code? ⊠ No C: Number of group interviews: 1 group of 4 (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration) D: Number of individual interviews D1: Male: 5 D2: Female: 1 (Please see SMETA Best Practice Guidance and Measurement Criteria) ⊠ Yes E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency No workers, Workers employed by service providers such as security and catering staff as well as workers supplied by If no, please give details other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 - Regular Employment, under Responsible Recruitment F: Interviews were done in private and the confidentiality X Yes of the interview process was communicated to the □No workers? M Favourable G: In general, what was the attitude of the workers towards their workplace? Non-favourable Indifferent H: What was the most common worker complaint? Employees do not have any complaints. I: What did the workers like the most about working at this Timely salary, no health and safety issues, site? positive Management- easily approachable, clean working place, no abusive language, no case of any harassment J: Any additional comment(s) regarding interviews: The Management has taken care of them during the COVID-19 lockdown K: Attitude of workers to hours worked: There are no Overtime since the work is not much. The workers vouched that the overtime is voluntary and if there is any need for overtime, permission is sought from them and the working hours are noted for overtime and the payment is made for the overtime work hours @ 200% of the basic salary. Interview of



	slow work especially after COVID-19, the work is absolutely minimal
L. Is there any worker survey information available?	
Yes No L1: If yes, please give details:	
M: Attitude of workers: (Include their attitude to management, workplace, and the interview pro included) Note: Do not document any information that could put workers	

10 workers were selected for interview, they were interviewed as 1 group of 4 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 currentwages which in their view were in line with wages in the locality. They felt free to leave this employer andunderstood 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 themanagement.

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

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

Based on the interaction with workers committee representative, it was noted that workers committee representative is not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received. No Union does exist.

#### O: Attitude of managers:

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

During the audit days, the management of establishment was very cooperative and very transparent to share the issues & information, Attitude of the management was found positive towards the audit and the audit process. The establishment was found aware of the requirements of a social audit & its applicable ETI and local law. The management was very transparent and cooperative during audit. The management was receptive to the findings and was very keen to implement all the measures to achieve compliance in their facility.



# **Audit Results by Clause**

## 0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

#### **Current Systems and Evidence Examined**

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

#### **Current systems:**

- 1. Based on review of records facility has established a policy covering human rights Policy No- Nil impacts and issues and it is displayed
- 2. Mr. Abhishek Gupta, managing director is responsible for implementing standards concerning Human rights.
- 3. 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.
- 4. Facility has not identified their stakeholders and salient issues.
- 5. Facility has measured direct, in-direct, and potential impacts on stack holder's human rights.
- 6. The Whistle blowing policy number Nil is available

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

#### Details:

Interaction with Management and Interview with employees Employee Handbook was reviewed. It stipulates complying with written policies and procedure that being provided individually to employees. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility

Any other comments: NA



A: Policy statement that expresses commitment to respect human rights?	<ul><li></li></ul>		
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?			
	Name: Mr. Abhishek Gupta Job title: MD		
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<ul> <li>Yes</li> <li>No</li> <li>C1: Please give details: Facility has provided a following grievance mechanism for confidential reporting anonymously without fear of retaliation and any breaches of policies and procedures.</li> <li>Workforce Representative</li> <li>Works committee.</li> <li>Grievance Committee</li> <li>Suggestion and Complaint Box</li> </ul>		
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	Yes No D1: If no, please give details		
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data procedures for workers' information, which is implemented?  E: Does the business demonstrate effective data procedures for workers' information, which is implemented.  E: Does the business demonstrate effective data procedures for workers' information, which is implemented.  E: Does the business demonstrate effective data procedures for workers' information effective data procedures for workers' informa		ne data privacy is for the pt under lock and key in employees, since all the computers are password	
Fin	dings		
Finding: Observation  Company NC Description of observation:		Objective evidence observed:	
Local law or ETI/Additional elements / customer spe	cific requirement:		



Comments:	
Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:



# **Measuring Workplace Impact**

Workplace Impact					
A: Annual worker turnover:  Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 10 %	A2: This year 10 %			
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	10				
C: 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	C1: Last year: 05 %	C2: This year 05 %			
D: 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	05				
E: Are accidents recorded?	Yes No E1: Please describe: Seen the accident incident register. There are no accidents happening in the factory during the last 2 years as per Form 15 and Form 23				
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: 0	F2: This year: Number:			
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	NIL				
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: NIL	H2: This year: NIL			
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months0% workers	I2: 12 months0% workers			







# **0B: Management system and Code Implementation**

(Click here to return to summary of findings)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.4 Suppliers are expected to communicate this Code to all employees.

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

## **Current Systems and Evidence Examined**

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

## **Current systems:**

Based from facility tour and review of records, facility has implemented the ETI base code and the code has been displayed in notice board and communicated to all the employees during induction training. Mr. Braiesh is responsible for compliance with the code.

Based on review of records that facility had obtained legally required Business license and approved plant layout.

The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.

The ETI based code was posted on-site for employee review.

The facility had set up policy and appointed one staff to update labor law requirements

The ETI code of conduct was signed off with the supplier

There is evidence of the supplier audit for the year 2022 as per the audit plan. The audit of Modern techniques

The Social Risk Assessment has not been done

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

#### Details:

- 1. Facility Policy and Procedures
- 2. Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
- Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law

Any other comments: NA

#### **Management Systems:**



A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	<ul><li>∑ Yes</li><li>☐ No</li><li>A1: Please give details: There is no prosecution</li></ul>
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: The child labour policy, Child remediation policy, young workers policy, forced labour policy, antiharassment policy, Zero abuse policy, ethical policy, anti-discrimination policy Anti Bribery Policy, health and safety Policy, environmental Policy, Sharp tool Policy, Equal Opportunity Policy, seen and the policies are displayed in the local language
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The policies are displayed. The personal files of 10 employees on sample basis seen. The age proof is there. There is no evidence of forced labour in the files. No part of salary is withheld as inferred from the salary record. Interview with 10 employee's shows there is no discrimination, nor there are nocases of any harassment
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: All the employees have undergone induction training where the social compliance policies and procedures were explained. The ETI training was conducted on 21.01.2023. Not all the persons are given training on ETI
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: The Training is not effective
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits).  Please detail (Number and date).	Yes No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Mr. Nishant Tyagi is taking care of the HR activities



H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Mr. Brajesh Pachauri
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: The policy of confidentiality dated 03.01.2022 available.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: All the information about the personal files are kept confidential. The salaries are transferred to the banks and the individual notifications are sent by the bank to the respective mobile phones. The health check up is kept confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: The social risk assessment not done
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: The internal audit is not done
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: The ETI code of conduct is signed off with the workers
Land rigi	nts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: Facility has copy of building occupation certificate with land registry papers as required by law. All approvals were verified.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	Yes No O1: Please give details: Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights.  If yes, does it include any due diligence the company will undertake to obtain free, prior and informed	Yes No Q1: Please give details: Facility has compensated the owner for the land prior to thefacility being built



consent, (FPIC) even if national/local law does not require it	
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	Yes No R1: Please give details: Facility has written policyto check all legal aspects before taking any land. Facility has taken legal opinion before taking the land.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: Facility has written policyto check all legal aspects before taking any land. Facility has taken legal opinion before taking the land.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ☑ No S1: Please give details: NA

Non-compliance:	
1. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code:  The ETI code of conduct training is not effective.	Objective evidence observed: (where relevant please add photo numbers) During documents
Local law and/or ETI requirement: Suppliers are expected to communicate this Code to all employees. Recommended corrective action: The training on the ETI code of conduct will be given	review
2. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code: There is no social risk assessment done	During documents review
Local law and/or ETI requirement:  Are risk assessments conducted to evaluate policy and procedure effectiveness?  Recommended corrective action:	
The social risk assessment will be done	
3. <b>Description of non-compliance:</b> NC against ETI/Additional Elements NC against Local Law NC against customer code: There is no internal audit done based on the ETI code of conduct	During documents review



Local	law	and	/or	<b>ETI</b>	real	ireme	nt:
LUCUI	IUW	ullu	/ UI		IEUU		711I.

Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks **Recommended corrective action:** 

The internal audit will be done

Description of Good Example (GE):

Observation:						
Description of observation: There is no evidence of the supplier audit being done based on the ETI code of conduct	Objective evidence observed:					
Local law or ETI requirement: Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain	During documents review					
Comments: The supplier audit will be done						

Good Examples observed:

Objective evidence

observed:



## 1: Freely Chosen Employment

(Click here to return to summary of findings)

#### ETI

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

# **Current Systems and Evidence Examined**

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

# **Current systems:**

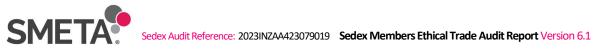
- 1. The factory has a policy which prohibits forced labour and this was available for review.
- 2. There was a non-formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
- 3. The employee handbook given to all workers on joining, states that workers within their probation period are free to leave without any notice and once a worker is permanent (this is out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also states that they will be given their full wages on their last day of work.
- 4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- 5. The factory did not require any payment for work tools, IC/staff card, training, etc.
- 6. The factory did not use prison labour.
- 7. The above was confirmed in management and employee interview

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

# Details:

- 1. Personnel files (all were checked)
- 2. Resignation records of recent 3 months
- 3. Factory rules
- 4. Employee handbook
- 5. Management and employee interview

Any other comments: NA



A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected:	
B: Is there any evidence of a loan scheme in operation	☐ Yes ☑ No B1: If yes, please give details and category of worker affected: NA	
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected: NA	
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No D1: Please describe finding: NA	
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes☐ No☐ No☐ Not applicable☐ Security E1: Please describe finding: turnover is 145 crores and there is no requirement to publish modern day slavery statement	
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding:	
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☐ Yes ☑ No ☐ Not applicable G1: If yes, please give details and category of workers affected: The human trafficking policy seen	
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<ul> <li>         ∑ Yes         ☐ No         H1: Please describe finding: There are evidence of the background verification before recruitment though the employees are chosen through personal contacts.     </li> </ul>	
	Non-compliance:	

				ľ
Audit company: DQS India	Report reference: ZAA423079019	Date: 6.3.2023	Sedexglobal.com 3	t



1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code:  The background verification of the employees is not done  Local law and/or ETI requirement Is the site taking any steps taking to reduce the risk of forced / trafficked labour?  Recommended corrective action: The background verification of the employees will be done	Objective evidence observed: (where relevant please add photo numbers)  During documents review		
Observation:			
Description of observation:  Local law or ETI requirement:  Comments:	Objective evidence observed:		
Good Examples observed:			
Description of Good Example (GE):	Objective evidence observed:		



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

(Click here to return to summary of findings)
(Click here to return to Key Information)

#### **ETI**

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

#### **Current Systems and Evidence Examined**

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

## **Current systems:**

There is no union at the site

There is workers committee at the site, worker representatives were elected by employees.

Based from employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.

Facility has formed a Workers Committee and Grievance committee and conducted meetings once in two months and the minutes of meetings are recorded for verification and future reference. Based from employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities.

Based from the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis

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

#### Details:

- 1 Social compliance system program and procedure
- 2. Suggestion box complain feedback
- 3. Meeting minutes
- 4. Works Committee Minutes dated 12/09/2022
- 5. Employee interview and management interview
- 6. Employee handbook and employment contracts were reviewed. They both stated that employees are free to form trade unions. Nobody will be treated differently whether they are members of the union

Any other comments: NA



A: What form of worker representation/union is there on site?	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None	
B: Is it a legal requirement to have a union?	☐ Yes ☑ No	
C: Is it a legal requirement to have a worker's committee?	Yes No As per Industrial Disputes Act, 1947, Section-3. Works Committee(1) In the case of any industrial establishment in which one hundred or more workmen are employed or have been employed on any day in the preceding twelve months, the appropriate government may by general or special order require the employer to constitute in the prescribed manner a Works Committee consisting of representatives of employers and workmen engaged in the establishment, so however that the number of representatives of workmen on the Committee shall not be less than the number of representatives of the employer. The representatives of the workmen shall be chosen in the prescribed manner from among the workmen engaged in the establishment and in consultation with their trade union, if any, registered under the Indian Trade Unions Act, 1926 (16 of 1926)	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<ul> <li>Yes</li> <li>No</li> <li>D1: Please give details:</li> <li>Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances.</li> <li>While interviewing, all employees reported that they are free to approach the management for anyproblem.</li> <li>D2: Is there evidence of free elections?</li> <li>Yes</li> <li>No</li> <li>There is no election being done for the last two years</li> </ul>	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Based from the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained	
F: Name of union and union representative, if applicable:	Not applicable. No union exited in facility.	F1: Is there evidence of free elections?  Yes No N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committees existed in facility	G1: Is there evidence of free elections?  Yes No N/A



⊠ Yes □ No H: Are all workers aware of who Based on workers interview it was noted their representatives are? that all workers are aware about the workers representative, I: Were worker representatives freely ☐ Yes ☐ No 11: Date of last election: not done elected? J: Do workers know what topics can be raised with their representatives? K: Were worker representatives/union If Yes, please state how many: 1 representatives interviewed? L: Please describe any evidence The worker committee is not done in 2022 that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc. ☐ Yes ☐ No M: Are any workers covered by Collective Bargaining Agreement (CBA)? M1: \_\_0\_\_% workers covered by M2: \_\_0\_\_% workers covered by If **Yes**, what percentage by trade Union/worker representation Union CBA worker rep CBA Yes M3: If Yes, does the Collective No NA Bargaining Agreement (CBA) include rates of pay?

Non-compliance:	
1. Description of non-compliance:  ☑ NC against ETI ☑ NC against Local Law ☐ NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
The worker representative election is not done for the last two years	During documents review
Local law and/or ETI requirement:  In accordance with The Industrial Disputes Act, 1947, CHAPTER II, section (3)(1)&(2) Works Committee,- (1) In the case of any industrial establishment in which one hundred or more workmen are employed or have been employed on any day in the preceding twelve months, the appropriate Government may by general or special order require the employer to constitute in the prescribed manner a Works Committee consisting of representatives of employers and workmen engaged in the establishment so however that the number of representatives of workmen on the Committee shall not be less than the number of representatives of the1. Ins. by Act 35 of 1965, s. 3 (w.e.f. 1-12-1965).153 employer. The representatives of the workmen shall be chosen in the prescribed manner	



from among the workmen engaged in the establishment and in consultation with their trade union, if any, registered under 10			
Recommended corrective action: The workers election will be held every 2 years			
2. <b>Description of non-compliance:</b> Note:	During documents review		
Local law and/or ETI requirement:  In accordance with The Industrial Disputes Act, 1947, CHAPTER II,section (3)(1)&(2) Works Committee (1) In the case of any industrial establishment in which one hundred or more workmen are employed or have been employed on any day in the preceding twelve months, the appropriate Government may by general or special order require the employer to constitute in the prescribed manner a Works Committee consisting of representatives of employers and workmen engaged in the establishment so however that the number of representatives of workmen on the Committee shall not be less than the number of representatives of the1. Ins. by Act 35 of 1965, s. 3 (w.e.f. 1-12-1965).153 employer. The representatives of the workmen shall be chosen in the prescribed manner from among the workmen engaged in the establishment and in consultation with their trade union, if any, registered under 10  Recommended corrective action:  The worker committee will be held every three months			
The Worker committee will be field every filled filefills			
Observation:			
Description of observation:	Objective evidence observed:		
Local law or ETI requirement:	Observed.		
Comments:			
Good Examples observed:			
Description of Good Example (GE):	Objective evidence observed:		



# 3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

#### FTI

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

## **Current Systems and Evidence Examined**

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

#### **Current systems:**

# 1. General Health and Safety management

- Mr. Himanshu is responsible for Health & Safety aspects for the site
- Potable water was freely available in all areas and test certificates were up to date
- Adequate clean toilets segregated by gender were always available to employees, there are male WC-5, urinal-6, Female Toilet-1
- Ventilation, temperature, and lighting were adequate for the production processes.
- Minutes of meetings show that there are monthly meetings between the workers and the Facility management, and each point is acted on. The HSE meeting is done on 20.02.2023

#### 2. Fire Safety

- There were at least 2 exits from each work area and these were clearly marked
- Firefighting equipment like 25 fire extinguishers, 4 fire alarm call point, 4 Emergency Lights, evacuation plan 2, exits 5, hydrants 5, hose reel- 2, fire buckets 9 were provided in the facility which was found adequate.
- Evacuation diagrams were posted in all areas.
- Fire drills were organized and recorded every 3 months as per the law. the mock drill was conducted on 3.3.2023 and 10.12.2022. The time taken is 3 mins.
- Facility has marked all the exits and emergency exits in a language understood by majority of the employees

# 3. Machine & Electrical safety

- All machine and electrical equipment were maintained in good condition.
- The test report of compressor is done by Cogs Associates on 21.10.2022
- The test report of DG done by Cogs Associates on 21.10.2022
- There were competent mechanic & electricians at the site to do the electrical work
- Facility had obtained periodic inspection certificate for all the machineries used.

#### 4. Medical Services



- Facility has provided well equipped first aid boxes in each production area (Total 05 first aid box) and they were well stocked.
- First aid certificate has been expired on 07/05/2022.

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

#### Details:

- Health and Safety Policy.
- Health and safety manual.
- Stability Certificate is valid until no change in structure.
- Industrial accident records Updated till November 2022.
- Health & Safety Committee meeting minutes dated 22/02/2023.
- Drinking Water Test report done by Winmet technologies on 12.10.2022.
- Fire Drill conducted once in 3 months. Last drill was conducted on 03/03/2023.
- Verified Ambient Air Quality done by Winmet technologies on 12.10.2022.
- Verified DG Noise Monitoring done by Winmet technologies on 12.10.2022.
- Verified Indoor Noise Monitoring done by Winmet technologies on 12.10.2022.
- Stack Emission done by Winmet technologies on 12.10.2022.
- Lux Intensity done by Winmet technologies on 12.10.2022.
- Indoor Air Quality done by Winmet technologies on 12.10.2022.
- Interaction with Management and Interview with employees.

Any other comments: NA

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1: Please give details: Facility has developed and implemented Health and safety policy and procedures. The same was communicated to employees through training. Policy was also displayed at prominent place.
B: Are the policies included in workers' manuals?	Yes No B1: Please give details: Facility has provided the policies to workers. The same was displayed at prominent place.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: Structural changes are made after getting prior approval from concerned authority.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: Factory communicated H & S practices applied in the factory for all visitors and provides relevant PPEs for them as per the requirement.
E: Is a medical room or medical facility provided for workers?	∑ Yes □ No



If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	E1: Please give details: Medical room is a trained first aider, also first aid boxed each section of the factory and empto them.	es have been provided in	
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☐ Yes ☐ No F1: Please give details: First aid certificate has been expire on 07/05/2022 on site and First aid medicines available for first aid.		
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☐ No G1: Please give details: No transport provided because all workers coming nearby.		
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	Yes No H1: Please give details: No living room provided.		
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Yes No I1: Please give details: Risk related to the working condition conducted on regular interval.		
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<ul> <li>☐ Yes</li> <li>☐ No</li> <li>J1: Please give details: Factory has all environmental related permitted.</li> </ul>		
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?  Yes  No  K1: Please give details: Factory is not using any banr chemicals?		not using any banned	
Non–compliance:			
Description of non-compliance:  ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  First aid training has been expired on 07/05/2022.		Objective evidence observed: (where relevant please add photo numbers)	
, 1000 mm. 19 10 10 mm. 10 10 mm. 10 10 mm. 10 10 mm. 10 m		During documents review	

in first aid treatment. Recommended corrective action: Facility needs to provide first aid training to the employees. 2. Description of non-compliance:



☐ NC against ETI code:	NC against Local Law	□ NC against customer	During documents review		
Hydro static test not cond	Hydro static test not conducted for 5 compressors.				
pressure vessel or plant in person – (i) externally, or	virement:  ar Pradesh Factories Rules 19 a service shall be thoroughly ence in every period of six moonths (iii) hydrostatically teste	examined by a competent onths (ii) internally, once in			
<b>Recommended corrective</b> Facility needs to conduct	re action: t hydro static test for all comp	pressors.			
3. Description of non-cord NC against ETI code: Fire alarm control panel r	mpliance:  NC against Local Law  not provided inside the facilit	□ NC against customer	During facility tour		
Local law and/or ETI requirement: In accordance with Factories Act 1948, Chapter IV section 38 (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 – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.					
Recommended corrective Facility shall provide fire of					
4. Description of non-cor NC against ETI code: Facility not provided h	mpliance:  NC against Local Law  and protection & mask t	□ NC against customer	During facility tour		
	on, Head protection & apron		Ç ,		
ensure, so far as is reason workers while they are generality of the provision extends, shall include- (an of work in the factory arrangements in the fact connection with the us substances, (c) the pro-	ctories Act 1948, Section 7A nably practicable, the health at work in the factory. (2) ons of sub-section (1), the model of that are safe and without ory for ensuring safety and all see, handing, storage and ovision of such information, asary to ensure the health are	n, safety and welfare of all Without prejudice to the atters to which such duty ance of plant and systems t risks to health, (b) the bsence of risks to health in transport of articles and instruction, training and			
Recommended corrective Facility needs to provide	re action: appropriate PPEs to the emp	loyees wherever required.			
5. Description of non–cor	mpliance:				



☐ NC against ETI code:	☑ NC against Local Law	□ NC against customer	During facility tour	
	2 out of 4 Emergency exit light found in non-functional condition.			
Local law and/or ETI requirement: In accordance with Factories Act 1948, Chapter IV section 38 (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 – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.				
Recommended corrective Facility shall provide emer	e action: gency light in functional co	ndition.		
code:	pliance:  NC against Local Law ded in 1 of 3 rolling shutters.	□ NC against customer	During facility tour	
Local law and/or ETI requirement: In accordance with Factories Act 1948, Chapter IV section 38 (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 – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.				
Recommended corrective Facility shall ensure electric				
code:	$oxed{oxed}$ NC against Local Law en condition in chemical cl	□ NC against customer eaning area and loos wire	During facility tour	
ensure, so far as is reasond workers while they are a generality of the provision extends, shall include- (a) of work in the factory tarrangements in the factor connection with the use substances, (c) the provisupervision as are necessity.	tories Act 1948, Section 7A ably practicable, the health of work in the factory. (2) as of sub-section (1), the mather provision and maintened that are safe and without ory for ensuring safety and a se, handing, storage and vision of such information, ary to ensure the health are	n, safety and welfare of all Without prejudice to the atters to which such duty ance of plant and systems trisks to health, (b) the bsence of risks to health in transport of articles and instruction, training and		
Recommended corrective	e action:			



Facility shall ensure electric safety.	
Observation:	
Description of observation:	Objective evidence
Local law or ETI requirement:	observed:
Recommended corrective action:	
Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:



#### 4: Child Labour Shall Not Be Used

(Click here to return to summary of findings)
(Click here to return to Key Information)

#### ETI

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

### **Current Systems and Evidence Examined**

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

### **Current systems:**

- Mr. Himanshu is responsible that there is not child labour inside the factory.
- The facility has established following system to ensure no recruitment of child labour:
- Facility verifies the original proof of age document during the pre-employment interview and a copy is maintained in the personal file of the employee.
- Facility had established child labour remediation policy.
- From facility tour, physical appearance of employees and interviews with management, there was no evidence of child labour or young labour employed by the facility.

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

### Details:

- Documented Policy on Child Labour Prevention.
- Child labour remediation policy displayed.
- Age proof record of employees.
- Physical appearance of employees.
- Interview with the employees.

Any other comments: None

A: Legal age of employment:	14 Year with restrictions.
B: Age of youngest worker found:	21 years
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
D: % of under 18's at this site (of total workers)	0 %



	T .		
E: Are workers under 18 subject to hazardous work assignments?  (Go to clause 3 – Health and Safety)	☐ Yes ☐ No E1: If yes, give details:		
	No worker under 18 is subject to em	plovee in hazardous works.	
		p.0 / C 2 2	
	Non-compliance:		
code:	cal Law 🗌 NC against customer	Objective evidence observed: (where relevant please add photo numbers)	
None			
Local law and/or ETI requirement:		None	
Recommended corrective action:			
2. <b>Description of non-compliance:</b> NC against ETI  NC against Local Law  NC against customer code:			
Local law and/or ETI requirement:			
Recommended corrective action:			
	Observation:		
<b>Description of observation:</b> None		Objective evidence observed:	
Local law or ETI requirement:		None	
Comments:			
Go	ood Examples observed:		
Description of Good Example (GE):		Objective Evidence	
None		<b>Observed:</b> None	



### 5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

#### ETI

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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. Himanshu is responsible for ensuring wages and benefits related requirements.
- Applicable minimum wages paid to all the employees. Wage slips were being issued to all employees.
- No deductions were made from the wages of the workers as a disciplinary measure.
- Wages were paid in time on monthly basis on or before 7th of every month.
- Company had a documented system to comply with applicable laws to ensure that the wages paid are in conformance to the standard and applicable local laws.
- The company had established Policy and Procedures to ensure that the wages paid to the employees always be enough to meet basic need.
- Based on review of wage records, the facility has paid the applicable minimum wages to all the employees.
- Wages are paid to 100% employees through bank transfer. However, proof showing that wages are transferred in account of respective employees was available for review.
- Based on employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
- Based on wage record review, all employees are covered under social security benefit of EPF (Provident fund) and ESIC (Employee State Insurance).
- Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
- Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages.

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

### Details:

- Wage record & payroll record verified for 10 selected Sample for 3 selected months.
- Record for deductions from wages.
- Payslips verified.



<ul> <li>Worker interv</li> </ul>	iew.
-----------------------------------	------

- Local and national laws.
- Wages and benefits policy.

A: Standard/Contracted work hours:

week, and month)

(Maximum legal and actual required working hours

excluding overtime, please state if possible per day,

Local legal minimum wage documents.

Any other comments: None				
Non-co	ompliance:			
1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code: None  Local law and/or ETI requirement:			<b>observ</b> (where i	ive evidence ed: relevant please oto numbers)
Recommended corrective action:				
Observation:				
Description of observation: None			Objective evidence observed:	
Local law or ETI requirement:			None	
Comments:				
Good Examples observed:				
Description of Good Example (GE):			Object Observ	ive Evidence ed:
Summary Information				
Criteria	Local Law (Please state legal requirement)	Actual (Site (Record results ago	e d site ainst the	Is this part of a Collective Bargaining Agreement?

Audit company: DQS India Report reference: ZAA423079019 Date: 6.3.2023 Sedexglobal.com 4.

Legal maximum:

8 hours per day,

48 hours per

week

A1: 8 hours per

day, 48 hours

per week

A2:

☐ Yes

⊠ No



B1: No overtime B: Overtime hours: Legal maximum: ☐ Yes (Maximum legal and actual overtime hours, please 2 hours per day, in sampled state if possible per day, week, and month) ⊠ No 12 hours per months. week, 50 hours per quarter. Legal minimum: C1: INR 9743 for C: Wage for standard/contracted hours: Yes (Minimum legal and actual minimum wage at site, INR 9743 for unskilled worker please state if possible per hr, day, week, and month) unskilled worker INR 10717 for ⊠ No INR 10717 for semi-skilled semi-skilled INR 12005 for INR 12005 for skilled labour skilled labour D2: D: Overtime wage: Legal minimum: D1: No overtime (Minimum legal and actual minimum overtime wage 🗌 Yes 200 % of ordinary in sampled at site, please state if possible per hr, day, week, and ⊠ No wages rate on months. month) normal workdays. 300% of rate of ordinary wages on holidays.

Wages analysis:  (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	⊠ Yes □ No		
A1: If <b>No</b> , why not?	NA		
B: Sample Size Checked (State number of worker records checked and from which weeks/months - should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 Sample for the m/o January 2023 10 Sample for the m/o October 2022 10 Sample for the m/o April 2022		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	∑ Yes □ No	C1: If <b>Yes</b> , please give details: INR 9743 for unskilled labour INR 10717 for semi-skilled labour INR 12005 for skilled labour	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Yes No N/A	D1: If <b>No</b> , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal min Meet Above	E1: Lowest actual wages found:Note: full time employees and please state hour / week / month etc. INR 9743 for unskilled worker INR 10717 for semi-skilled INR 12005 for skilled labour	



F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:100% of workforce earning minimum wage F3:% of workforce earning above minimum wage			
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week/month etc.			
		cussion with l per legal req		nent & records review bonus paid
H: What deductions are required by law e.g. social insurance? Please state all types:	Employees	s Provident F	und (EPF),	Employee state insurance (ESIC)
I: Have these deductions been made?	∑ Yes ☐ No	11: Please li deductions have been	s that	Employees State insurance (ESIC)     Employees Provident Fund (EPF)
				Please describe: Both are mandatory @12% PF of basic wage and 0.75% ESIC of Total wage.
		I2: Please li deductions have not b made.	s that	1. 2.
		made.		Please describe:
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	Yes No  K1: Type  Poor record keeping Isolated incident Repeated occurrence:			
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No L1: Please give details: Facility has implemented IN/OUT" time recording system. All employees register their "IN" time at arrival in the facility and "OUT" time when leaving the facility after work. All required meeting/trainings are conducted during working hours for which employees are paid. Employees do not attend any meeting/training for which they will not be paid.			
M: Is there a defined living wage: This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info:	☐ Yes ☐ No M1: Please specify amount/time:			



Please see SMETA Best Practice Guidance and Measurement Criteria.	Facility does not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government.
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: NA
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: When wages increased.  When government revise applicable minimum wage rate after consideration to basic needs of workers plus discretionary income and issue minimum wage notification for the factories to follow. Facility revises wages of the employees accordingly.
O: Are workers paid in a timely manner in line with local law?	∑ Yes □ No
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details:  Equal rates paid to equal work. Confirmed through interview and wage record review.
Q: How are workers paid:	☐ Cash ☐ Cheque ☐ Bank Transfer ☐ Other Q1: If other,please explain:



### 6: Working Hours are not Excessive

(Click here to return to summary of findings)
(Click here to return to Key Information)

#### ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where <u>all</u> of the following are met:
  - this is allowed by national law;
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety; and
  - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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. Himanshu is responsible to take care all working hours update and issues.
- The company uses electronic system to record employees in & out time.
- Factory operates from Monday to Saturday weekly day off is Sunday.
- The facility worked in a single shift. The employees work 6 days a week.
- Regular hours were 48 hrs/week.
- All employees receive at least one day off in every seven-day period.
- The working hours were displayed on the notice board.

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

Details:



- Records of actual in and out time for the sample months for all selected samples.
- Working hours and Overtime policy
- Security guards' duty records i.e. duty chart of the security guards.
- Accident / Injury register.
- Materials movement records: Inward / Outward register.

Any other comments: None

Non–compliance:		
1. Description of non-compliance:  NC against ETI  NC against Local Law  NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
None		
Local law and/or ETI requirement:	None	
Recommended corrective action:		
Observation:		
Description of observation: None Local law or ETI requirement:	Objective evidence observed: None	
Comments:		
Good Examples observed:		
Description of Good Example (GE): None	<b>Objective Evidence Observed:</b> None	



Working hours' analysis  Please include time e.g. hour/week/month  (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Electronic				
B: Is sample size same as in wages section?	Yes No B1: If no, please (	give details	:		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	workers d contracts		nils including % and dard hours defined reements.	
D: Are there any other types of contracts/employment agreements used?		D1: If YES,	please complete	e as appropriate:	
		0 hrs	Part time	Variable hrs	Other
		If "Other"	, Please define:		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	Yes No	and frequ		ırs, %, types of work	ers affected
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable:  1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this o	allowed by local l	aw?	
	Maximum numbe	er of days v	worked without a	day off (in sample).	
	06 Days				



Standard/Contracted Hours worked G: Were standard Yes G1: If yes, % of workers & frequency: working hours over 48  $\boxtimes$  No hours per week found? Yes H: Any local H1: If yes, please give details: ⊠ No waivers/local law or permissions which allow averaging/annualised hours for this site? **Overtime Hours worked** I: Actual overtime hours Highest OT hours: No Overtime observed in selected months. worked in sample (State per day/week/month) J: Combined hours Yes ⊠ No (standard or contracted + overtime hours = total) over 60 found? Please give details: K: Approximate 0\_\_\_% percentage of total workers on highest overtime hours: L: Is overtime voluntary? ⊠ Yes L1: Please detail evidence e.g. Wording of П No contract/employment agreement/handbook/worker Conflicting interviews/refusal arrangements: Information Factory has voluntary overtime policy and same was communicated to employees. **Overtime Premiums** M: Are the correct legal X Yes M1: Please give details of normal day overtime premium as a % of **standard** wages: overtime premiums No ☐ N/A – there paid? is no legal requirement to OT premium X Yes N: Is overtime paid at a N1: If yes, please describe % of workers & frequency: ΠNo premium? 50% & monthly basis.



O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes	<ul> <li>No</li> <li>□ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)</li> <li>□ Collective Bargaining agreements</li> <li>□ Other</li> </ul>
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	NA
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<ul> <li>✓ Overtime is voluntary</li> <li>☐ Onsite Collective bargaining allows 60+ hours/week</li> <li>☐ Safeguards are in place to protect worker's health and safety</li> <li>☐ Site can demonstrate exceptional circumstances</li> <li>☐ Other reasons (please specify)</li> </ul>
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	NA
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☑ No



#### 7: No Discrimination is Practiced

(Click here to return to summary of findings)

#### ETI

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

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepolicies and written procedures inconjunction 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. Himanshu is responsible for the investigation and disposal of discrimination case.
- 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
- The human resource department is responsible for the investigation and disposal of discrimination
  case.
- Facility had provided suggestion boxes, which is opened on regular basis.
- The factory provides equal access to employment as well as equal pay for equal work.

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

### Details:

- Documented policy on Discrimination.
- Interaction with the employees.
- Hiring procedure, compensation, access to training, promotion, termination or retirement.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:95% A2: Female_05%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	1
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion ☐ Termination or retirement ☐ No evidence of discrimination found



	C1: Please give details: No discrimina	ation on any basis.	
	-		
Professional Development			
A: What type of training and development are available for workers?	Induction training 03/02/2023, Firefig H&S training 12/01/2023, Machinery s 19/01/2023, PPE's training 12/01/20 training 30/01/2023.	safety / operating training	
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	⊠ Yes □ No		
	If no, please give details:		
	Non-compliance:		
Description of non-compliance:      NC against ETI		Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement:		None	
Recommended corrective action:			
2. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:			
Local law and/or ETI requirement:	Local law and/or ETI requirement:		
Recommended corrective action:			
Observation:			
<b>Description of observation:</b> None		Objective evidence observed:	
Local law or ETI requirement:		None	



Comments:	
Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: None



### 8: Regular Employment Is Provided

(Click here to return to summary of findings)
(Click here to return to Key Information)

#### ETI

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment.

### Additional Elements: Responsible Recruitment

- 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
- 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
- 8.5 Employment agencies must only supply workers registered with them.
- 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
- 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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. Himanshu is responsible to ensure that regular employment is provided for every employee.
- Based on record review and employee's interview appointment letters issued to selected employees.
- Based from interaction with the company management, it was noted that all employees are employed on regular basis, and no casual and apprentice employees were engaged.
- Facility does not employ any migrant workers.
- Based on interaction with employees, no recruitment fees is required at any stage of the recruitment process.

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

### Details:

- Facility Policy.
- Appointment letter with terms and conditions for 10 out of 10 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees.
- Training records

Any other comments: None



Non-compliance:	
1. Description of non-compliance:  NC against ETI  NC against Local Law  NC against customer code:  None	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement:	None
Recommended corrective action:	
2. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:	
Local law and/or ETI requirement:	
Recommended corrective action:	
Observation:	
Description of observation: None	Objective evidence observed:
Local law or ETI requirement:	None
Comments:	
Good Examples observed:	
Description of Good Example (GE):  None	Objective Evidence Observed: None
Responsible Recruitment	•
All Workers	



A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<ul> <li>☑ Terms &amp; Conditions presented</li> <li>☑ Understood by workers</li> <li>☑ Same as actual conditions</li> <li>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</li> </ul>	
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	Yes No B1: If yes, please describe details and specific category(ies) of workers affected:	
C: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other – C1: If other, please give details:	
D: If any checked, give details:	NA	
Migrant Workers:  The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity		
A: Type of work undertaken by migrant workers:	NA – No migrant employees engaged by facility	
B: Please give details about recruitment agencies for migrant	B1: Total number of (in country recruitment agencies) used:	

B2: Total number of (outside of local country) recruitment workers: agencies used: Yes No C: Are migrant workers' voluntary C2: Observations: deductions (such as for remittances) confirmed in writing by the worker and C1: Please describe finding: Report reference: ZAA423079019 Date: 6.3.2023 Sedexglobal.com

Audit company: DQS India



is evidence of the transaction supplied by the facility to the worker?		
D: Are Any migrant workers in skilled, technical, or management roles  Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	Yes No	example of roles:

# **NON-EMPLOYEE WORKERS**

Recruitment Fees:	
A: Are there any fees?	☐ Yes ☐ No
B: If yes, check all that apply:	Recruitment / hiring fees  Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other  B1- If other, please give details:
C: If any checked, give details:	NA NA

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)		
A: Number of agencies used (average):	A1: Names if available: NA – No Agency engaged by facility	



B: Were agency workers' age/pay/hours included within the scope of this audit?	☐ Yes ☐ No	
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No	
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No	
	D1: Please give details:	
E: Does the site have a system for checking labour standards of agencies?	☐ Yes ☐ No	
If yes, please give details.	E1: Please give details:	
Contractors:  Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,		
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details: No contractors engaged by the facility.	
B: If <b>Yes</b> , how many workers supplied by contractors?		
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: NA	
D: If <b>Yes</b> , please give evidence for		



### 8A: Sub-Contracting and Homeworking

[Click here to return to summary of findings] [Click here to return to Key Information]

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

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

Note to auditor on homeworking:

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

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

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepolicies and written procedures inconjunction 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. Himanshu is responsible for ensuring sub-contract or home workers requirements.
- Factory is not using any subcontracting process and subcontractor for any process.
- No home workers are used by factory for any process.

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

#### Details:

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

Non-compliance:



1. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code:  None  Local law and/or ETI /Additional Elements requirement:	Objective evidence observed: (where relevant please add photo numbers)
Recommended corrective action:	
2. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code:  NC against customer code:	
Local law and/or ETI requirement:	
Recommended corrective action:	
Observation:	
<b>Description of observation:</b> None	Objective evidence observed:
Local law or ETI/Additional elements requirement:	None
Comments:	
Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None	None
Summary of sub–contracting – if applicable	
Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	



B: If sub–contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If <b>Yes</b> , summarise de	etails:		
C: Number of sub– contractors/agents used:				
D: Is there a site policy on sub- contracting?	Yes No D1: If <b>Yes</b> , summarise d	etails:		
E: What checks are in place to ensure no child labour is being used and work is safe?				
Su	mmary of homeworking  Not Applicable p		ole	
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes☐ No A1: If <b>Yes</b> , summarise details:			
B: Number of homeworkers	B1: Male:	B2: Female	<b>:</b> :	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		C1: If through agents, number of agents:	
D: Is there a site policy on homeworking?	☐ Yes ☐ No			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?				
F: What processes are carried out by homeworkers?				
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No			
	G1: Please give details	:		
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No			



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

### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	Yes No A1: Please give details: Suggestion box, committee meetings.  Facility has invited NGO (third party) in Anti sexual harassment committee and the grievance can be directly reported to them.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Workers were given awareness on grievance mechanisms.  Facility Anti sexual harassment committee representative will communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion boxes, committee meetings, and can directly inform top management.
D: Which of the following groups is there a grievance mechanism in place for?	₩ Workers     □ Communities     □ Suppliers     □ Other  D1: Please give details: Suggestion boxes & committee meetings.
E: Are there any open disputes?	Yes No E1: If yes, please give details
F: Does the site encourage its business Partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g.helplines or whistle blowing mechanism)	Yes No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<ul><li></li></ul>



H: If yes, are workers aware of these the disciplinary procedure?	⊠ Yes □ No
	H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	Yes No I1: If yes, please give details
To complete 'current systems' Auditorsexaminepolic and record what controls and processes are currently carried out, who is /are responsible for the ma	ystems and Evidence Examined riesandwrittenproceduresinconjunction withrelevantmanagers, to understand, y in place e.g. record what policies are in place, what relevant procedures are nagement of this item of the code. Evidence checked should detail any erbal evidence shown to support the systems.
Current systems:	
<ul> <li>Through the interview with the factor harsh, inhumane or abuse of the er</li> <li>Base on the facility's disciplinary por Physical harassment.</li> <li>Illegal movement during working he Abuse &amp; threat.</li> <li>Mental harassment.</li> <li>Any types of sexual harassment.</li> </ul>	purs.
Evidence examined – to support system de renewal/expiry date where appropriate):	escription (Documents examined & relevant comments. Include
Details:	
<ul> <li>Minutes of Committee meeting.</li> <li>Factory's policy on sexual abuse.</li> <li>Employee/worker's interview.</li> <li>Management discussion.</li> </ul>	
Any other comments: None	
	Non-compliance:



1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement:	None
Recommended corrective action:	
2. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:	
Local law and/or ETI requirement:	
Recommended corrective action:	
Observation:	
<b>Description of observation:</b> None	Objective evidence observed:
Local law or ETI requirement:	None
Comments:	
Good Examples observed:	
Good Examples observed:  Description of Good Example (GE):  None	Objective Evidence Observed: None



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

(Click here to return to NC-table)

### **Additional Elements**

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

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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. Himanshu is responsible for implementing entitlement to work and immigration requirements.
- Workers with a legal right to work shall be employed or used by the factory. There are no agency staffs, employment agencies and immigration workers in the factory.
- Based from the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.
- Based from the review of employee personal files, all the employees are holding the legal rights to work.

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

### Details:

- Document review
- Worker interview
- Management interview
- Recruitment policies
- Employee handbook

Any other comments: None

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1. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code:  None	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI /Additional Elements requirement:	None		
Recommended corrective action:			
2. Description of non-compliance:  NC against ETI/Additional Elements  NC against customer code:  NC against customer code:			
Local law and/or ETI/Additional Elements requirement:			
Recommended corrective action:			
Observation:			
Description of observation: None	Objective evidence observed:		
Local law or ETI/Additional Elements requirement:	None		
Comments:			
Good examples observed:			
Description of Good Example (GE):	Objective Evidence Observed:		
None	None		



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

(Click here to return to summary of findings)

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

#### **B.4. Compliance Requirements**

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

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

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

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

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

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

### **B4.** Guidance for Observations

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

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

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

### **Current Systems and Evidence Examined**

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

### **Current systems:**

- Mr. Brajesh is responsible for environment related requirements.
- The factory has obtained pollution consent from Pollution State Control Board.
- When interaction with management and document review that the factory had an environment policy and procedure in place. However, factory has an agreement with approved vendors for dispose of wastages from production and they posted the signage's of safe water & safe electricity.
- Facility has conducted necessary Air quality, Noise monitoring testing as required by law.
- Facility is aware of the legal environmental requirements.

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

Details:



Environment policies. Relevant environmental test reports. Legally required permissions/certificates. Valid approvals and consents. Environmental certificates. Environmental objectives.	
Any other comments: None	
Non compliance:	
Non-compliance:	
1. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code:  None	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI/Additional Elements requirement:	None
Recommended corrective action:	
2. Description of non-compliance:  NC against ETI/Additional Elements  NC against customer code:  NC against customer code:	
Local law and/or ETI/Additional elements requirement:	
Recommended corrective action:	
Observation:	
<b>Description of observation:</b> None	Objective evidence observed: None
Local law or ETI/Additional elements requirements:	
Comments:	
Good examples observed:	
Description of Good Example (GE):  None	Objective Evidence Observed: None





<b>Environmental Analysis</b> (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)			
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Brajesh Pachauri – Factory Manager		
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes No B1: Please give details: The factory has contacted expertise to conduct the environment impact assessment in the factory.		
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	Yes No C1: Please give details: N\A		
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	Yes No D1: If yes, is it publicly available? Factory has displayed the policy in notice board.		
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	Yes No E1: Please give details: The factory has contacted expertise to conduct the environment impact assessment in the factory.		
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	☐ Yes ⊠ No		
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. (For guidance, please see Measurement criteria)	Yes No G1: Please give details: Factory do not use wooden in their production.		
H: Have all legally required permits been shown? Please gives details.	Yes No H1: Please give details: The factory has obtained the Pollution NOC from the concerned department.		
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	Yes No N/A  I1: Please give details: The factory does not use any hazardous chemicals in production process and they obtained the NOC from pollution department.		
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes No J1: Please give details: It was noted through document review and management interview that the factory has not use any "banned chemicals" and they follow the Client's country regulations.		
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	Yes No K1: Please give details: The factory does not have any such wastage from production process. Hence they have not recycle process.		



L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	Yes No L1: Please give details: Waste disposed to authorized vendors.		
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	Yes No M1: Please give details: The factory has maintained all the records of consumption of water and electricity.		
N: Has the facility checked that any Sub-Contracting agencies or business Partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes No N1: Please give details: Factory has not yet implemented the system to monitor the subcontractors. But they are not outsourced any process.		
Usage/Disch	arge analysis		
Criteria	Previous year: Please state period: 2022	Current Year: Please state period: 2023	
Electricity Usage: Kw/hrs	22961	200	
Renewable Energy Usage: Kw/hrs	0	0	
Gas Usage: Kw/hrs	0	0	
Has site completed any carbon Footprint Analysis?	☐ Yes ⊠ No	☐ Yes ⊠ No	
If <b>Yes</b> , please state result	NA	NA	
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Ground water	Ground water	
Water Volume Used: (m³)	1.5	.1	
Water Discharged: Please list all receiving waters/recipients.	Domestic Sewage	Domestic Sewage	
Water Volume Discharged: (m³)	0.5	0.05	
Water Volume Recycled: (m³)	0	0	
Total waste Produced (please state units)	ETP Sludge - 1123 KG Scrap – 15 KG	ETP Sludge - 1123 KG Scrap – 4 KG	
Total hazardous waste Produced: (please state units)	ETP Sludge - 1123 KG Scrap – 15 KG	ETP Sludge - 1123 KG Scrap – 4 KG	
Waste to Recycling: (please state units)	0	0	



Waste to Landfill: (please state units)	ETP Sludge - 1123 KG Scrap – 15 KG	ETP Sludge - 1123 KG Scrap – 4 KG
Waste to other: (please give details and state units)	0	0
Total Product Produced (please state units)	18,00,000 Pcs.	3,00,000 Pcs.



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

(Click here to return to summary of findings)

To be completed for a 4–Pillar SMETA Audit

### 10C. Compliance Requirements

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

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

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

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

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

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

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

#### 10C. Guidance for Observations

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

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

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

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditorsexaminepoliciesandwrittenproceduresinconjunction withrelevantmanagers, 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. Himanshu is responsible and ensure to meet business ethical requirements. The company has a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals. It also ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

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

### Details:

The company has drafted Business Ethics policy to ensure ethically business without bribery, corruption, or any type of fraudulent Business Practice. In addition the company has designated person responsible for implementing standards concerning Business Ethics.



Any other comments: None		
Non-compliance:		
Non-compliance.		
1. Description of non-compliance:  NC against ETI/Additional Elements  NC against customer code:  None	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI/Additional Elements requirement:		
Recommended corrective action:		
Observation		
<b>Description of observation:</b> None	Objective evidence observed:	
	None	
Local law or ETI/Additional elements requirement:  None		
Comments:		
None		
Good examples observed:		
Description of Good Example (GE):	Objective Evidence	
None	Observed:	
A: Does the facility have a Business Ethics    Market   M		
Policy and is the policy communicated and Policy for third parties including	suppliers	



applied internally, externally or both, as appropriate?	A1: Please give details: Facility has developed business ethics policy and communicated to its employees and suppliers.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☐ Yes   ☐ No
	B1: Please give details: The factory has imparted the training to all the workers, training imparted on regular intervals.
C: Is the policy updated on a regular (as needed) basis?	⊠ Yes □ No
	C1: Please give details: Factory has established the system to review the policy annually.
D: Does the site require third parties including suppliers to complete their own business ethics training	⊠ Yes □ No
	D1: Please give details: The factory has communicated the ethical policy to their suppliers and customers.



Other findings

None

# **Community Benefits**

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

None



# **Photo Form**







Factory Name & address

Factory building

Factory main gate







Fire alarm

Fire extinguisher

Fire buckets





Date: 6.3.2023



Fire pump

Attendance machine

Suggestion box

Audit company: DQS India

Report reference: ZAA423079019

Sedexglobal.com









Assembly area

Exit marking

Evacuation plan







First aid box

Drinking water

Toilet







Forging

Cutting 1

Cutting 2







Chemical plating

Electro plating

Polishing









Spraying

Packing

ETP

# **Non-Compliance Photo**







PPEs missing in Polishing



PPEs missing in Spraying



Non-functional emergency light



No locking devices



Open electric board





For more information visit: <a>Sedexglobal.com</a></a>

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

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

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

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d

### Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

# **Click here for Auditors:**

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