

Sedex Members Ethical Trade Audit Report





Sedex Audit Reference: 2022PKZA

		Audit De	etails				
Sedex Company Reference: (only available on Sedex System)	ZC:		Sedex Site (only availa		nce: Sedex System)	ZS:	
Business name (Company name):							
Site name:							
Site address: (Please include full address)				Cour	ntry:	Paki	stan
Site contact and job title:	Zeeshan Ab	id – Ger	neral Manag	ger			
Site phone:			Site e-mai	l:	auditsquerie	s@ou	tlook.com
SMETA Audit Pillars:	Labour Standards		alth & Safety nment 2-Pillo		Environm 4-pillar	ent	Business Ethics
Date of Audit:	10 th Septem	ber, 202	2				



		Audit C	onducted By		
Affiliate Audit Company	\boxtimes	Purchaser		Retailer	
Brand owner		NGO		Trade Union	
Multi- stakeholder			Combined	Audit (select all that ap	ply)

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

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



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.



Date: 10.09.2022





Sedex Audit Reference: 2022PK2

SMETA Declaration

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

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

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

Auditor Team (s) (please list all including al	l interviewers): Nil
Lead auditor: Muhammad Wasim Jafri	APSCA number: RA 21701784
Lead auditor APSCA status: In Good Stand	ing
Team auditor: Nil	APSCA number: Nil
Interviewers: Muhammad Wasim Jafri	APSCA number: RA 21701784

Report writer: Muhammad Wasim Jafri (Senior Auditor) Report reviewer: Miss. Anandhi (Senior Report Reviewer)

Date of declaration: 10th September, 2022

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

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code 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.

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Summary of Findings

Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)	
umber line*:	GE
Record the number of issues by line*:	Obs
Recor	NC
t non- where the	Customer Code
Area of Non-Conformity (Only check box when there is a non- conformity, and only in the box/es where the non-conformity can be found)	Additional Elements
Area of No check box 'y, and only n-conformi	Local Law
(Only conformii no	ETI Base Code
Issue Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor. please ensure that when issuing	the audit report, hyperlinks are retained.

		1	Γ	o z
None	 Observation: The SAQ was not completed by the factory management. Non-conformity: Facility did not display ETI Code of Conduct in their premises. 	None	None	 Non-conformities: Electrical panel was found without safety warning sign and rubber mat under electrical panel. Workers working in knitting section were not using PPEs. i.e Dust mask, Safety shoes and Ear plugs. Fire extinguisher found blocked by work in process fabric bags. One sewing machine was found without eye guard.
0	0	0	0	0
0	-	0	0	0
La state in the second s	_	0	0	4
Universal Rights covering UNGP	<u>Management systems and</u> code implementation	Freely chosen Employment	Freedom of Association	Safety and Hygienic Conditions
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Report reference: GOL

Audit company: GCL International Ltd

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None	None	None	None	None	None	None	None	None	N/A, as it is a 2-pillar audit	N/A, as it is a 2-pillar audit	
0	0	0	0	0	0	0	0	0	٩N	NA	
0	0	0	0	0	0	0	0	0	٩Z	٩N	
0	0	0	0	0	0	0	0	0	NA	٩N	
	and the second second	and the second sec									
							1	5. 7. 4 4.			
Child Labour	Living Wages and Benefits	<u>Working Hours</u>	Discrimination	Regular Employment	<u>Sub-Contracting</u> and <u>Homeworking</u>	<u>Harsh or Inhumane Treatment</u>	Entitlement to Work	Environment 2-Pillar	Environment 4-Pillar	Business Ethics	
4	5	6	7	8	8A	6	10A	1082	1084	20	

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Report reference: GCI

Audit company: GCL International Ltd



Site Details

	Site Details		
A: Company Name:			
B: Site name:			
C: GPS location: (If available)	GPS Address:	Latitude: Longitude:	
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Directorate of Labo 2440)2019/298	Number): 0672181-8 bur Certificate #: FA/W/CM herce membership no: 3379	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Product: All kind of Process: knitting, cu packing.	knitted garments itting, sewing, checking, fin	ishing and
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	total land area is 2. form which 2 building	at D178/A, SITE, Karachi – Po 2 acres where the premises ngs are occupied by MY er ed by another factory on re	have 5 buildings hterprises rest of
	For below, please o	dd any extra rows if appro	priate.
	Production Building no 1	Description	Remark, if any
	Ground Floor	Occupied by cutting, finishing, pressing and packing and carton storage area.	None
	First Floor	Occupied by sewing and cropping section.	None
	Production Building no 2	Description	Remark, if any
	Ground Floor	Occupied by knitting section, drinking water point and offices.	None
	Is this a shared buildin g ?	This is a shared buildin g	None
	F1: Visible structural Yes No F2: Please give deto observed.	integrity issues (large crack ails: During the facility tour n we a structural engineer evo	o crack was



	F4: Please give details: Building stability certificate obtained from Khatri Associates, dated: 10 th August, 2022, approved by: Engineer / Z. Najam / PEC # 4241
G: Site function:	Agent ******
H: Month(s) of peak season: (if applicable)	No obvious peak season
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Product: All types of knitted garments. knitting, cutting, sewing, checking, finishing and packing. Production lines: Knitting: 02 lines Cutting: 01 lines Sewing: 04 lines Checking: 02 lines Packing: 02 lines Main equipment: Cutting machines Sewing machines Knitting machines
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 X No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details: No accommodation is provided by factory to the workers.

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	Audit Param	neters	
A: Time in and time out	A1: Day 1 Time in: 09:00AM A2: Day 1 Time out: 06:10PM	A3: Day 2 Time in: NA A4: Day 2 Time out: NA	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	1.0 (1 auditor X 1.0 day)		
C: Audit type:	Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define		
D: Was the audit announced?	Announced Semi – announced: Windo Unannounced	w detail: 03 weeks	
E: Was the Sedex SAQ available for review?	☐ Yes ⊠ No E1: If No, why not? SAQ not pr	ovided by the factory.	
F: Any conflicting information SAQ/Pre- Audit Info to Audit findings?	☐ Yes ⊠ No If Yes , please capture detail ir	n appropriate audit by cl	ause
G: Who signed and agreed CAPR (Name and job title)	Zeeshan Abid – General Mano	ager	
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ⊠ No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this	Yes No		
audit			





Audit attendance	Management	Worker Representati	ves
	Senior management	Worker Committee representatives	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)	Not applicable, as W	orker representatives	were present.
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	committee formed b present in opening n committee is respons the local law of Pakis and in case there is n	a factory. There was a by the workers whose r neeting and closing m sible to solve worker's stan, workers are allow no union, worker coun be present as alternat	epresentatives are leeting, worker council issues. According to yed to form unions cil committee or joint

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Sedex Audit Reference: Sedex Members Ethical Trade Audit Report Version 6.1

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.

	. K.		Worker	Worker Analysis				
	1	Local			Migrant*			ł
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	80	0	0	0	0	0	0	80
Worker numbers - female	05	0	0	0	0	0	0	05
Total	85	0	0	0	0	0	0	85
Number of Workers interviewed – male	80	0	0	0	0	0	0	08
Number of Workers interviewed – female	02	0	0	0	0	0	0	02
Total – interviewed sample size	10	0	0	0	0	0	0	10



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Report-reference:

-Date: 10:09:2022-





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A: Nationality of Management	Pakistani	
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: <u>Pakistani</u> B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? \overline \overline \o
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 100% C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	 D: — % workers on piece rate D1: — % hourly paid workers D2: 100% salaried workers Payment cycle: D3: — % daily paid D4: — % weekly paid D5: 100% monthly paid D6: — % other D7: If other, please give details 	

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Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	☐ Yes ⊠ No	
B: Were workers aware of the code?	⊠ Yes □ No	
C: Number of group interviews: (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)	4 workers in 1 group	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Femále: 02
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 - Regular Employment, under Responsible Recruitment	∑ Yes ☐ No If no, pl e a s e g ive details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	Favourable	
H: What was the most common worker complaint?	No complaints raised by th interviews.	e workers during
I: What did the workers like the most about working at this site?	During interviews workers g regarding facility working c environment.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Workers were satisfied with hours of work as shift timings and overtime hours are within legal limits. Overtime working is voluntary, and workers are not forced to work overtime.	
L. Is there any worker survey information available?		
Yes No L1: If yes, please give details: Feedback form.		



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

As per the interviewed committee members, all the committee members are happy with the factory management. Regular meetings are held and the grievances are taken care of by the management.

O: Attitude of managers:

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

The facility management was very receptive and showed a positive attitude towards the audit. All documents were provided on timely manner. At the end of the audit, all the non-compliances were accepted by the facility. The auditor took permission for taking photographs and conducting confidential employee interviews. The facility management granted permission to conduct a full audit, including employee interviews, facility walk through and document review.

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M: Attitude of workers:

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

The Management of **Angenetics** agreed that the auditor can conduct confidential interviews with workers who were chosen freely without any influence by the company management; workers were selected randomly from different processes for group and individual interviews, conducted at an independent room that was located at the Management Office. The workers showed a cooperative attitude during the interview process. The overall attitude of workers toward management was positive, workers were happy with the on-time payments and encouraging working environment. They agreed with management policies of the company and praises for motivational and supportive behaviour of management.

The information of interview was as below:

- For child labour issue, all interviewees confirmed that the company requested national identity cards to verify their ages in recruiting. All interviewed workers declared their ages were over 18 years old and also showed their national identity cards for verification, youngest worker found in facility was 19 years old.
- For forced labour issue, the workers confirmed no "security money or deposit" was required and their
 original documents such as original identity cards were not retained by company.
- For discrimination issue, the workers' wages were paid based on their skills, production outputs and abilities. Workers are treated with respect & dignity, all interviewees confirmed that no discrimination was in practice by the company.
- For disciplinary practices issues, the interviewees said they were asked to observe the company rules and policies, no employees were fined or fired if they violate the company rules.
- For safety and health issue, the workers were satisfied with the working condition and the company
 provided orientation training for new workers and regular safety training to all workers. Fire drills were
 conducted twice per year for production area and admin, which included the evacuation.
- For working hour's issues, workers reported they worked for 6 days per week, 8 hours per day as per local law.
- For wages issue, the interviewed worker said they could obtain the wages in cash. Their wages were
 paid before 7th of every month. Workers' wages were calculated by monthly rate. For OT wages,
 the interviewees said the company having a policy; 200% of normal rate for overtime on working
 days and 300% of gazetted holidays. Legal leaves were provided to all employees as per local law.
- For treatment issue, the workers confirmed in interviews, no harsh or inhumane treatment was in practice and the management was encouraging and supportive to all employees.
- For freedom of association issue, there was a Worker Council Committee and workers confirmed the
 election process and nomination of worker representative. They could also complaint to their
 supervisors directly or wrote anonymous letter to the suggestion box, company also had open door
 policy for all workers to report any issue and suggestions.

Report reference: GO

Date: 10.09.2022



Audit Results by Clause

0A: Universal Rights covering UNGP

0A: Universal Rights covering UNGP

<u>IClick here to return to summary of findingst</u>

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. Facility has established Human Rights policy and trained all the worker on human rights and also guide them about the complaint mechanism.
- 2. Facility has established and maintained appropriate procedures to evaluate and select suppliers based on their ability to meet the requirements of this standard.
- Workers are aware of the anonymous way to report grievance related to Human rights without fear of reprisals, etc.

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

Details:

- Human Rights Policy
- Social & ETI Code Policy communication records
- Social Policies and Collective Bargaining Agreements
- Training to workers on grievances Mechanism
- Senior Management Commitment & ETI Code Implementation

Any other comments: None



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A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details: Factory has developed the policy for Human Rights which is covered the topics such as Corporate Human Rights commitment on forced labor, child labor, discrimination and harassment and also communicated with their workers, business partners / suppliers. Moreover, all the human rights related topics are included in employee handbook. Human Rights Policy signed by Mr. Sajjad Ahmed, Manager HR & Compliance who is responsible to implement the requirement of Human Rights policy with in the factory and supply chain.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	∑ Yes ☐ No Please give details: Name: Sajjad Ahmed Job title: Manager HR & Compliance
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?	Yes No C1: Please give details: Yes, company has a transparent system for documents and information. Open door policy and complaint / suggestion box.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	Yes No D1: If no, please give details: Facility has established grievance mechanism system in form of different channels worker council committee and suggestion complaints box system are used to deliver grievances to the upper management.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	Yes No E1: Please give details: Facility has developed an effective database privacy system for workers and company information.

Findings: None observed		
Finding: Observation Description of observation:	Company NC 🗌	Objective evidence observed:
Local law or ETI/Additional elements / customer specific requirement:		
Comments:		

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



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Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021 2%	A2: This year: 2022 1%
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]	0.5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2021 1 %	C2: This year: 2022 2 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.5%	
E: Are accidents recorded?	Yes No E1: Please describe: There is a system to record the accidents but no accidents happened so far.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 2	F2: This year: 2022 Number: 1
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.5	
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: 2021 0	H2: This year: 2022 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	11: 6 months 0% workers	I2: 12 months 0% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months <u>0</u> % workers	J2: 12 months 0% workers

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0: Management systems and Code Implementation

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:

- 1. The facility has system in place to implement the social code
- Company has taken written commitment from all its suppliers to comply with social compliance code of conduct. company adopted and maintains procedure to evaluates and renew the suppliers annually.
- 3. The facility has appointed Mr. Sajjad Ahmed (Manager HR & Compliance) is responsible for implementation of ETI Base code in the facility.
- 4. Personnel files are found to be well maintained and kept in HR department and kept confidential,
- 5. The facility has drafted its policies on forced labour, child labour, discrimination, harassment and freedom of association.

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

Details:

- Social Policy Manual
- Employees Handbook
- Management Representative Labour contract
- Policy on forced labour, child labour, discrimination, harassment, general human rights, freedom of association
- Training records against company policies
- Business Licenses
- Personal files
- Notice boards

Any other comments:

The overall observation shows that the company has set a system to implement & monitor the social management system, appointed a Manager HR & Compliance to implement and maintain company's Social Management system. Company has a system to select business partners as per their company policy, company has communicated the ETI base code with their partners. Further, the company has a proper production plan as well as lost time reporting system implementing monthly/daily basis.



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Management Systems:		
A: In the last 12 months, has the site been subject to any fines/prosecutions for non- compliance to any regulations?	Yes No A1: Please give details: No fines and prosecution are imposed on the factory in the last 06 months.	
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 facility has its own policies and procedures on forced labour, child labour, discrimination, harassment & abuse and the policies are posted for worker's reference. The facility conducts training to the workers on legal requirements and ETI base code requirements. The facility does not retain any original documents of the employees and checks with a valid age proof document at the time of hire.	
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	On the day of audit, no traces of forced labour, child labour, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect. The facility conducts training to all employees related to health and safety, legal requirements etc. and maintains all training records.	
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 managers are trained on child labour, discrimination, harassment & abuse.	
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: Training records were available that shows the effective training was provided to workers on social practices, and ethics. Training effectiveness was assessed by interviewing workers and was well understood by the workers.	
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: Factory has HR department to secure and ensure the rights of the worker.	
H: Is there a senior person / manager responsible for implementation of the code	Yes No	



	H1: Please give details: Mr. Sajjad Ahmed is serving the factory as a Manager HR & Compliance is responsible for implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: All workers personnel information is secured in the form of employee files and kept under the supervision of Human Resources Department.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: Yes, all information is secured by HR Department.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Health and safety risks identified through risk assessment practices carried by management and there were also keeps a mechanism to identify potential risk factors audits and monthly inspection of facility.
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: If any risk identified during risk assessment, management makes a plan to reduce or eliminate the risk by issuing notice to concern department.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: Factory does have a policy for implementation of code of conduct on their suppliers.
	Land rights
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: The facility has approved building plan which is showing the legal land rights.
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: Not required by local law.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	Yes No P1: If yes, how does the company obtain FPIC: The facility's policy on land rights, includes any due diligence undertaken cover FPIC, even not required by the national law.

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Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	Yes No Q1: Please give details: This is an owned facility by the owner of the company and does not require the approval for the expansion and building approvals.
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: All the alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes No S1: Please give details: This facility is completely legalized. No sign of illegal appropriation of land observed / evidenced during the audit.

Non-compliance: 01	
1. Description of non-compliance: Noted during the factory visit that factory did not display ETI Code of Conduct in their premises.	Objective evidence observed: 1.Noted during factory visit.
NC against ETI/Additional Elements INC against Local Law	VISIT.
Local law and/or ETI requirement: In accordance with ETI Code Section OB: Management system and Code Implementation. B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Recommended corrective action: It was agreed by the factory management that they would make sure to display the ETI Code of Conduct in their premises.	

Observation: 01	
Description of observation: Noted during management interview that SAQ was not completed by the factory management. Local law or ETI requirement: In accordance with ETI Code 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	Objective evidence observed: 1. Noted during management interviews and documents review.
Comments: It is agreed by the factory management that they will complete SAQ.	



Good Examples observed: None observed		
Description of Good Example (GE):	Objective evidence observed:	

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1: Employment is Freely Chosen

1: Freely Chosen Employment

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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. Based on interview with the workers, management and document review, the employees could freely resign with proper notification in advance 30 days minimum.
- The employees obtained their job by themselves by seeing advertisement or by recommendation from existing employee; they were not asking or forced to lodge deposits or their identity papers to the company at time of employment.
- 3. During facility visit, workers' interview and document review, there were no traces identified of forced, bonded or involuntary prison labour identified.

Workers were free to leave at the end of the company timing (18:00) as per local law,

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

Details:

- Checked personnel files of the 10 workers
- Employment agreements
- Terms and conditions.
- Attendance records 10 samples August from 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month).
- Social Policy.

Any other comments:

The overall observation shows that the employees are free to leave the company when they resign from the services, with payment. There is no restriction on workers' movement within the premises. The workers are not forced to stay back once they get authorized leave from the management.



A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ⊠ No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ⊠ No D1: Please describe fin d ing: N/A
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 ⊠ Not applicable E1: Please describe finding: N/A
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: No evidence found of restriction on leaving the site at the end of the shift it was verified through worker interview and attendance record generated by face & thumb scanning time keeping equipment.
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: Facility has communicated abolition or forced labour policy with their partners to understand the risk of bonded labour.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: Facility is working and implemented forced labour policy.





Non-compliance: None observed		
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		
Recommended corrective action:		
Observation: None observed		
Description of observation:	Objective evidence observed:	

Local law or ETI requirement:

Comments:

Good Examples observed: None observed	
Description of Good Example (GE):	Objective evidence observed:



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

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:

- Worker Council Committee was established in the company, 05 workers representatives were the members of this council. Worker's representatives were elected on 14th February 2022 for open attitude and communication between the company management and workers.
- 2. Workers representative's meetings were in practice to discuss any issues, demands and suggestions of the topic discussed in the meeting is to solve workers related issues.
- 3. The workers can complaint to their supervisors directly, through their representatives, or as per open door policy; directly to the management, although the suggestion box was available in the company for collecting workers complaints and suggestions.

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

Details:

- Worker Council Committee Document
- Election Records
- Worker Council Committee Meeting records
- Suggestion Boxes Record
- Safety committee meeting records

Any other comments:

The company has established a complete policy and procedures in place to ensure workers right to Freedom of Association and Right to Collective Bargaining are Respected collectively. No worker was found who is directly involved with any trade union (Discussed during interviews).



A: What form of worker representation/union is there on site?	Union (name)	e Worker Council 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	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: Company has defined workers communication policy, for which suggestion and complaint boxes were installed in the company. Company has also open-door policy or to convey through their department incharge and directly to management. Worker council committee gives awareness to the labour about the proper usage of these channels so they can raise their voice against any issue they are having. D2: Is there evidence of free elections? Yes No 	
	Yes No E1: Please give details: There is no preferential or discriminatory behaviour practiced with workers' committee members. They work in their departments as per their assigned jobs.	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	No E1: Please give detai discriminatory behav members. They work	viour practiced with workers' committee
facilities to allow the Union or committee	No E1: Please give detai discriminatory behav members. They work	viour practiced with workers' committee
facilities to allow the Union or committee to conduct related business? F: Name of union and union	 No E1: Please give detai discriminatory behav members. They work assigned jobs. No registered union 	F1: Is there evidence of free elections?
facilities to allow the Union or committee to conduct related business? F: Name of union and union representative, if applicable: G: If there is no union, is there a parallel means of consultation with workers e.g.	 No E1: Please give detai discriminatory behav members. They work assigned jobs. No registered union in the company. Worker Council 	F1: Is there evidence of free elections? Yes No N/A G1: Is there evidence of free elections?
facilities to allow the Union or committee to conduct related business? F: Name of union and union representative, if applicable: G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees? H: Are all workers aware of who their	 No E1: Please give detai discriminatory behav members. They work assigned jobs. No registered union in the company. Worker Council Committee 	F1: Is there evidence of free elections? Yes No N/A G1: Is there evidence of free elections? Yes No N/A All the workers are aware with their
facilities to allow the Union or committee to conduct related business? F: Name of union and union representative, if applicable: G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees? H: Are all workers aware of who their representatives are? I: Were worker representatives freely	 No E1: Please give detai discriminatory behav members. They work assigned jobs. No registered union in the company. Worker Council Committee Yes No 	viour practiced with workers' committee in their departments as per their F1: Is there evidence of free elections? ☐ Yes ☐ No



Sedex Audit Reference: 2022PKZ

L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Worker Council Committee is effective and helpful to workers. Workers representative's meetings were in practice to discuss any issues, demands and suggestions of employees and to address the issues or suggestions to management. Last meeting was conducted and the topic discussed in the meeting is to solve workers related issues.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	🗌 Yes 🖾 No	
If Yes , what percentage by trade Union/worker representation	M1:% workers covered by Union CBA	M1:% workers covered by Union CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No	

Non-compliance: None observed	
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:	. ,
Recommended corrective action:	

Observation: None observed		
Description of observation: Local law or ETI requirement:	Objective evidence observed:	
		Comments:
Good Examples observed: None observed		
Description of Good Example (GE):	Objective evidence observed:	



3: Working Conditions are Safe and Hygienic

3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)

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ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

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

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

- 1. Workers and management interview show the factory had provided health and safety training to workers. Factory provided relevant records for review.
- 2. Factory had planned and arranged the fire drill twice a year, which included the evacuation exercise. The factory provided relevant records for review.
- 3. Based on on-site observation, the first aid kits were available in each department of each floor, Trained first aiders were available.
- 4. Factory provided adequate number of toilets.
- 5. EHS/OHS Committee is responsible for H&S issues in the factory.
- 6. Approved Building Map and building stability certificate was available.
- 7. The factory had established health and safety policy. Injury record was maintained.
- 8. Emergency contact numbers were displayed prominently in production, management and main gate.

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

Details:

- Civil defence certificate no: 08(01)97-CDMICDO-(W)
- Fire Drill Record dated 30-08-2022
- Water Test Report dated 10-08-2022
- Air quality test report 10-08-2022
- Electrical Inspection Record dated 04-07-2022
- Injury Record No injury / accident record in last 6 month.
- Air quality test date: 10- Aug-222
- Emissions test date: 10- Aug-222
- Waste disposal date 16th August 2022
- Training Records dated 23-08-2022
- Building Map
- Risk Assessment dated 20-07-2022
- Fire Extinguishers Inspection dated 20-08-2022

Report reference: GCL



Sedex Audit Reference: 2022PKZ

- Fire Alarm Inspection dated 20-08-2022
- Emergency Lights Inspection dated 20-08-2022
- Electrical installation inspection Checklist dated 05-09-2022
- Machine Maintenance inspection record dated 06-09-2022
- Safety Warning Signs Inspection

Any other comments:

The overall observation shows that the company has established a complete 'health & safety' policy procedure. The production floor was quite clean. Evacuation maps were available in all areas. Sufficient drinking water was available in the production floors. Fire extinguishers were also properly charged and ready for use. The overall health & safety condition of the company was found to be good.

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: Procedures and policies were available; Workers and management interview shows the company had provided health and safety training to workers. The company provided relevant records for review.
B: Are the policies included in workers' manuals?	 Yes No B1: Please give details: Factory does have social compliance manual which include the following policies. Child Labour Discrimination policy Forced Labour Working hours Overtime hours Hiring policy Firing policy / retrenchment Wages policy Working hours policy Environmental policy Social compliance policy
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ⊠ No C1: Please give details:
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: Yes provided (Face Mask and ear muffs).
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	Yes No E1: Please give details: No medical room provided for workers, as there was no such legal requirement. However, facility has provided medical facility like first aid medicine and trained first aiders in each section to act on any case of emergency.



Seciex Audit Reference: 2022PKZA

F: Is there a doctor or nurse on site or	
there is easy access to first aider/	□ No
trained medical aid?	F1: Please give details: Factory has trained first aiders on each
	department and floors.
G: Where the facility provides worker	
transport - is it fit for purpose, safe,	No
maintained and operated by competent persons e.g. buses and	G1: Please give details: Transport is not provided by the facility
other vehicles?	and it is not a legal requirement.
H: Is secure personal storage space	
provided for workers in their living space and is fit for purpose?	No H1: Please give details: Factory did not provide any dormitory
	facility for the workers and it is not a legal requirement.
	,
I: Are H&S Risk assessments are	X Yes
conducted (including evaluating the arrangements for workers doing	No I1: Please give details: Factory management conducted
overtime e.g. driving after a long shift)	periodic risk assessment to evaluate the risks on every aspect.
and are there controls to reduce	
identified risk?	
J: Is the site meeting its legal obligations on environmental requirements	X Yes □ No
including required permits for use and	J1: Please give details: Facility has developed the policy for
disposal of natural resources?	Environment protection and natural resource preservation,
	facility has an agreement with waste management company
K: Is the site meeting its customer	for disposal of waste.
requirements on environmental	
standards, including the use of banned	K1: Please give details: Not applicable as the facility does not
chemicals?	use any chemicals it its production process.



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Non-compliance: 04		
1. Description of non-compliance: Noted during factory visit that one electrical panel in building two at knitting section on ground floor was found without safety warning sign and rubber mat under electrical panel.	Objective evidence observed: 1. Noted during factory visit. (See NC photo 1),	
NC against ETI NC against Local Law NC against customer code:		
Local law and/or ETI requirement Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Local law requirement In accordance with Electricity Rules, 1937 of section 60 Sub-Section "e". the word 'Caution', both in English and in the vernacular, shall be affixed permanently in a conspicuous position, where possible, on every generator and every motor and every controlling or regulating apparatus in connection with such generator or motor: Provided that, where it is not possible to affix them on the generator, motor, or apparatus, they shall be affixed as near as possible: Provided also that, where the generator, motor, controlling or regulating apparatus, is within an enclosure accessible only to an authorized person, one notice affixed to the enclosure shall be sufficient for the purposes of this Subrule.		
Recommended corrective action: It is agreed by the facility management that they will post warning signs and place rubber mat under electrical panel at the knitting section on ground floor.		
2. Description of non-compliance: Noted during factory visit that workers working in knitting section in building two on ground floor were not using PPEs i.e Dust mask, Safety shoes and Ear plugs.	2. Noted during factory visit. (See NC photo 2).	
NC against ETI NC against Local Law NC against customer code:		
Local law and/or ETI requirement: Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		

Report reference: GCL

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Local law requirement In accordance with the Factories Act 1934 (XXV of 1934), Chapter III, Health & Safety, section 16 (1) dust and fume, in every factory, in which by reason of the manufacturing process carried on, there is given off any dust or fume or other impurity of such a nature and to such an extent as is likely to be injurious or offensive to the workers employed therein, effective measures shall be taken to prevent its accumulation in any work room and its inhalation by workers.	
Recommended corrective action: It is agreed by the facility management they will provide PPEs i.e Dust mask, Safety shoes and Ear plugs to knitting workers and it will be ensured that all workers use PPEs during working.	
3. Description of non-compliance: Noted during factory visit that one fire extinguisher in building one in finishing section on ground floor was found blocked by work in process fabric bags.	3. Noted during factory visit. (See NC photo 3).
NC against ETI NC against Local Law NC against customer code:	
Local law and/or ETI requirement: <u>Code 3.1 A safe and hygienic working environment shall be provided, bearing</u> in mind the prevailing knowledge of the industry and of any specific hazards. <u>Adequate steps shall be taken to prevent accidents and injury to health arising</u> <u>out of, associated with, or occurring in the course of work, by minimizing, so far</u> <u>as is reasonably practicable, the causes of hazards inherent in the working</u> <u>environment.</u>	
Local law requirement In accordance with the Local law Ref THE SINDH FACTORIES ACT, 2015. SINDH ACT NO, XIII OF 2016. CHAPTER III Health and Safety section 29 precautions in case of fire.	
Recommended corrective action: It is agreed by the facility management they will remove work in process fabric bags from building one in finishing section on ground floor.	
4. Description of non-compliance: Noted during factory visit that one sewing machine out of forty sewing machines in building one in sewing section on first floor, was found without eye guard.	4. Noted during factory visit, (See NC photo 4).
NC against ETI NC against Local Law NC against customer code:	
Local law and/or ETI requirement: Code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	


Sedex Audit Reference: 2022PKz

Local law requirement In accordance with the Sindh Factories Act 2015 Fencing of machinery section 30 (1) (1) In every factory the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the parts of machinery required to be fenced are in motion or in use, namely – (d) of (iii) every dangerous part of any machinery.	
Recommended corrective action: It is agreed by the factory management that they will install needle guard on stitching machine in building one in sewing section on first floor, and it will be ensured that all safety gadgets should be in place at all times for safe machine operations.	

Observation: None observed		
Description of observation:	Objective evidence	
Local law or ETI requirement:	observed:	
Recommended corrective action:		

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

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4: Child Labour Shall Not Be Used

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:

- 1. There are no apparent concerns related to child labour at the facility.
- The facility has a policy in place to participate in and contribute to programmes that provide for the transition of a child found to performing child labour in order to enable the child to attend and remain in quality education until no longer a child.
- 3. No juvenile workers (under the age of 18) are employed at the facility.
- 4. All practices regarding youth employment at the facility appear to be in line with ILO conventions.

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

Details:

- Social Policy Manual
- Recruitment notices
- Policy on child labour and remediation
- Verification of 10 personnel files for a valid age proof document.

Any other comments:

During factory tour, no person found to be hired under the age of 18 years.

A: Legal age of employment:	On site: 18 years / adult workers (without restriction)
B: Age of youngest worker found:	19 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%
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ⊠ No E1: If yes, give details



Non-compliance: None observed				
Description of non-compliance: NC against ETI	Objective evidence observed: (where relevant please add photo numbers)			
Local law and/or ETI requirement:				
Recommended corrective action:				
Observation: None observed				
Description of observation:	Objective evidence observed:			

Local law or ETI requirement:

Comments:

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



5: Living Wages are paid

5: Living Wages are Paid

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. There were no deductions made for disciplinary practices.
- 2. There were no reports of non-compliances regarding wages at the facility and the payroll of the facility workers showed that wages were paid in line with legal requirements.
- 3. Wages are paid before the expiry of 07th of every month and a copy of wage slips is issued to the employees at least a day prior to the disbursement of wages.
- 4. All employees are guaranteed with minimum wages and are provided with all legal benefits like Annual leave and Employees Life Insurance.
- 5. No illegal deductions noticed nor reported by workers.

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

Details:

- Social Policy Manual
- Employment Agreements
- Payrolls records 10 samples from August from 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month) for review.
- Attendance records 10 samples from August from 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month) for review.
- Production records (from work floors to check for discrepancies)
- Leave records
- Settlement records
- EOBI (Employees Old Age Benefit Institutions)
- Attendance records of 10 workers were checked.
- Payroll and Payment records of 10 workers were checked.
- Social Security for workers
- Group Insurance Policy

Any other comments: None



Non-compliance: None observed				
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:				
Recommended corrective action: :				
Observation: None observed				
Description of observation:	Objective evidence			
Local law or ETI requirement:	observed:			
Comments:				

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

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 48 hours per week	A1: 48 hours per week	A2: Yes No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day and 12 hours per week	B1:0 hours per day	B2: □ Yes ⊠ No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: PKR 25,000 / month	C1: PKR 25,000 / month	C2: U Yes No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of normal wage on work day, 300% of normal wage on week rest day, 300% of normal wage on National holiday.	D1: 200% of normal wage on work day, 300% of normal wage on week rest day, 300% of normal wage on National holiday.	D2: Yes No



Wages analysis:

Wages analysis: Click here to return to Key Information				
A: Were accurate records shown at the first request?	∑ Yes □ No			
A1: If No , why not?				
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 samples fr	10 samples from August 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (Initial month) for review.		
C: Are there different legal minimum wage grades? If Yes , please specify all.	Yes C1: If Yes, please give details: No Unskilled PKR 25,000 / month.			
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Yes D1: If No , please give		ase give details: N/A	
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 full time employees and please state in week / month etc. Company paid 25,000 PKR as minimum wage which is as per 		ees and please state hour / tc. sid 25,000 PKR as lowest	
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:46% of workforce earning minimum wage F3:54% 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. All employees are paid an annual bonus which is equal to one monthly salary as per law dated 28-07-2022.			
H: What deductions are required by law e.g. social insurance? Please state all types:	Income tax, EOBI			
I: Have these deductions been made?	and EOBI deduct		2. Taxes Please describe: Taxes and EOBI deductions were made from	
		l2: Please deductio not been	ns that have	 Late comings other disciplinary actions



				Please describe: Late comings were not deducted.
J: Were appropriate records available to verify hours of work and wages?	∑ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes K1: Type ⊠ No ☐ Poor record ☐ Isolated ind ☐ Repeated			
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: All the provided records were consolidated with each other.			l records were
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: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ⊠ No M1: Please specify amount/time:			
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:			
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: Factory is paying minimum wage as per law and as per compensation and benefits policy company will review the salaries on annual basis.			
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: As verified through the payroll records for the months August 2022, January 2022 and September 2021 for review. The wages are equally paid as employees worked.			
Q: How are workers paid:	Cash Cheque Bank Transfer Other Q1: If other, please explain:			



6: Working Hours are not Excessive

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' 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. Facility has installed electronically scanning system to track the working hours of the facility.
- As per the reviewed attendance records for the month of 10 samples from August 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month) for review.
- 3. The regular working hours are maintained as per the legal requirement of 48 hours a week.
- 4. Overtime is observed to be not conducted in the facility for the sampled months.
- 5. 7th day rest is observed to be guaranteed to all sampled employees reviewed for the sampled months of 10 samples from August 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month) for review.

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

Details:

Employment Agreements



Sedex Audit Reference: 2022

- Payrolls for 10 employees for the month of 10 samples from August 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month) for review.
- Attendance records for 10 employees for the month of August 2022 (recent month), 10 samples from January 2022 (random month) and 10 samples from September 2021 (initial month) for review.
 Working records (from computers, to check for discrepancies)
- Leave Records

Any other comments:

The overall observation shows that the company has a working hour policy posted in all prominent places in the premises. As per records provided by the company, the company uses the workers daily in and out time. As per provided records, the highest working hours is 8 hours/day and 48 hours/week which was within the legal limit of working hours. The maximum continuous working days were noted 6 days.

Non-compliance: None observed		
1. Description of non-compliance: NC against ETI 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:		
Recommended corrective action:		

Observation: None observed			
Description of observation:	Objective evidence		
Local law or ETI requirement:	observed:		
Comments:			

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



Working hours' analysis

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: The facility has electronically time keeping system to track the working hours of the employees.				track the
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 C1: If NO, please give details including % and which type of workers do NOT have standard hou defined in contracts/employment agreements. Please give details:			lard hours	
D: Are there any other types of contracts/employment	☐ Yes ⊠ No	D1: If YES, please complete as appropriate;		e:	
agreements used?		0 hrs	Part time	0 hrs	Other
		If "Other", Ple	ase define:		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ⊠ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: None			workers
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 allowed by local law? Yes No			
	Maximum number of days worked without a day off (in sample):				
	6 days				
Standard/Contracted Hours w	orked			-	
G: Were standard working hours over 48 hours per week	☐ Yes ⊠ No	G1: If yes, % o	f workers & free	quency:	
found?		None			



H: Any local waivers/local law	🗋 Yes	H1: If yes, please give details:	
or permissions which allow averaging/annualised hours for this site?	No No	None	
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 0 hours per day 0 hours per week 0 hours per month		
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ⊠ No		
K: Approximate percentage of total workers on highest overtime hours:	00%		
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Overtime is voluntary as per employee hand book and labour contract.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages: 200 %+ of normal wages.	
N; Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: Overtime paid at premium 200% of normal wage on work day, 300% of normal wage on week rest day, 300% of normal wage on national holiday.	
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	 No Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) Collective Bargaining agreements Other 		
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other		
	N/A		



Sedex Audit Reference: 2022PK

P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	 Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week Safeguards are in place to protect worker's health and safety Site can demonstrate exceptional circumstances Other reasons (please specify) 	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
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

7: No Discrimination is Practiced

[Click here to return to summary of findings]

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- There are no apparent concerns with regard to discrimination in any form at the facility. It was observed that promotion & training opportunity is based on the worker's willingness and competency.
- 2. Further all the interviewed employees reported that they are treated with dignity and respect and they receive same and similar treatment like other workers

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

Details:

- Social Policy Manual
- Labour contracts
- Payrolls (check for equal remuneration is paid for equal work done)
- Attendance records (attendance checked check for equal opportunities to work overtime)
- Policy on Discrimination
- Notice board

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>94</u> % A2: Female <u>06</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, 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 signs of discrimination found in the facility (documents reviews, workers interview and factory tour). Factory has strict policy against discrimination.



Sedex Audit Reference: 2022PK2

Professional Development	
A: What type of training and development are available for workers?	The company has provided trainings on Professional Development to newly and existent employees on periodically basis.

B: Are HR decisions e.g. promotion,	🛛 Yes
training, compensation based on	No
objective, transparent criteria?	
	If no, please give details:

Non-compliance: None observed			
Description of non-compliance: NC against ETI	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI requirement:	,		
Recommended corrective action:			

Observation: None observed			
Description of observation:	Objective evidence		
Local law or ETI requirement:	observed:		
Comments:			

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



8: Regular Employment Is Provided

8: Regular Employment Is Provided

<u>(Click here to return to summary of findings)</u> <u>(Click here to return to Key Information)</u>

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, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record wh**a**t 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. Employees have Employment Agreements which are equivalent to labour contracts as they outline their rights as employees, their remuneration, etc.
- 2. All interviewed employees have informed the auditor that they have a received copy of Labour Contract. There were no apparent concerns on the day of assessment.
- 3. The facility does not have temporary employees.

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

Details:

- Social Policy Manual
- Labour contracts (for 10 employee)
- Payrolls (for 10 employees)
- Leave records
- Employment Agreements

Any other comments:

The overall observation shows that the facility follows all the requirement of local law related to employment. During the employees' interview, employees stated that they sign Labour Contract with the facility and obtained the copies of their Employment Agreement prior to joining.



Non-compliance: None observed			
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:			
Recommended corrective action:			

Observation: None observed	
Description of observation:	Objective evidence observed:
Local law or ETI requirement:	obseived.
Comments:	

Good Examples observed: None observed	
	Objective Evidence Observed:

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?	 Terms & Conditions presented Understood by workers Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not applicable
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ 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 transport costs between work place and home Any transport 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:	N/A

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:	No migrant workers found in the facility.	
B: Please give details about recruitment agencies for migrant workers:		country recruitment agencies) used: utside of local country) recruitment
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	Yes No C1: Please describe finding: N/A	C2: Observations:
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 D1: If yes, number and	example of roles: N/A



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 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
C: If any checked, give details:	Not Applicable

(workers sourced from a local agent who are i	Workers (if applicable) not directly paid by the site, but paid by the agency, Usually the wages of the individual workers are paid by the agency.)
A: Number of agencies used (average): A1: Names if available: Not applicable	
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 checki labour standards of agencies? If yes, please give details.	ing Yes No E1: Please give details:	
	Contractors: ly individuals who supply several workers to a site. Usually the contractors orkers are paid by the contractor. Common terms include, g ang bosses, labor provider,	
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:	
B: If Yes , how many workers supplied by contractors?	None	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: N/A	
D: If Yes , please give evidence for contractor workers being paid per law:	N/A	



8A: Sub-Contracting and Homeworking:

8A: Sub–Contracting and Homeworking

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- As confirmed by the facility management and as observed during the facility walk through it was confirmed that the facility has all the production process in-house like cutting, stitching, quality checking and packing.
- 2. Verified through document review, factory tour, management interview and employee interview that no sub-contracting & Home-working was used by this factory.

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

- Production process flow diagram
- Inward and Outward receipts
- Subcontractor policy
- Internal audit records for subcontractor

Details: None

Non-compliance: None observed		
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code:	NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI /Additional Elements requirement:		
Recommended corrective action:		



Observation: None observed	
Description of observation: Local law or ETI/Additional elements requirement:	Objective evidence observed:
Comments:	

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

Summary of sub-contracting - if applicable	
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	☐ Yes ☐ No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If Yes , summarise details:
C: Number of sub- contractors/agents used:	
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	



Summary of homeworking – if applicable Not Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No A1: If Yes , summarise details:			
B: Number of homeworkers	B1: Male:	B2: Female	»:	Total:
C: Are homeworkers employed direct or through agents?	Directly Through Agents		C1: If throu agents:	ugh agents, number of
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

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

ETI

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

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

A: Are there published, anonymous, and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	Yes No A1: Please give details: The factory provided access to a confidential grievance mechanism for all workers.
B: If Yes , are workers aware of these channels and have access? Please give details.	All employees were trained on the facility confidential grievance mechanism.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box and employees also could communicate to HR staff and top management directly as there is an open- door policy.
D: Which of the following groups is there a grievance mechanism in place for?	 ✓ Workers ✓ Communities ✓ Suppliers Other
	D1: Please give details: The grievance mechanism includes a provision for non- retaliation, and it allows workers to report issues anonymously. The facility has placed a suggestion box outside the facility for the communities to raise their issues and also meets the communities time to time in person. For suppliers, at the time of signing the agreement it is told that they can raise their issues by filling a complaint application easily available on the main gate or HR department.
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?	∑ Yes ☐ No G1: If no, please explain



H: If yes, are workers aware of these the disciplinary procedure?	X Yes No H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages	☐ Yes ⊠ No
section)?	11: If yes, please give details

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. As per the interviewed employee's testimony, all employees are treated with dignity and respect and there were no signs of physical abuse, sexual or other harassment and verbal abuse.

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

Details:

- Social Policy Manual
- Disciplinary Policy
- Personal Files (10 personnel files were checked for proof of identity documentation).
- Payroll records for the month of 10 samples

Any other comments: None

Non-compliance: None observed		
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:		
Recommended corrective action:		

Observation: None observed		
Description of observation:	Objective evidence observed:	
Local law or ETI requirement:	observed:	
Comments:		

Good Examples observed: None observed		
	Objective Evidence Observed:	



10 A: Entitlement to Work and Immigration

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

[Click here to return to NC-table]

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

- 1. There are no foreign nationals employed onsite.
- 2. All employees' personal data files have photocopies of documentation showing that they have local citizenship and do not need special permission to work in the factory.
- 3. The facility does also have contractual employees and all employees are on facility payroll.

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

Details:

- Social Policy Manual
- Employee pay roll
- Personal data files (10 personnel files were checked for proof of identity documentation).

Any other comments: None

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



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





10 B 2: Environment 2-pillar

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

[Click here to return to summary of findings]

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

pillar

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

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

Current Systems and Evidence Examined

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

Current systems:

 Company has established Environmental policies and environmental management system. The facility has a proper practice to handle the waste of the facility. The overall cleaning condition of the facility is satisfactory.

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

Details:

- Environmental policy.
- Waste Records
- Waste Outward Gate pass
- Aspect impact Analysis Reports

Any other comments:

The overall observation shows that the company has developed a precise policy and procedure on environment management system. The waste collection and disposal records are properly maintained. According to the policy the waste is collected every week by the local authority. The company does not produce any wastewater. The company conducted risk assessment (environmental impact assessment).



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Non-compliance: None observed		
1. Description of non-compliance: Image: NC against ETI/Additional Elements Image: NC against ETI/Additional Elements requirement:	Objective evidence observed: (where relevant please add photo numbers)	
Recommended corrective action:		
Observation: None observed		

Description of observation:

Local law or ETI/additional elements requirement:

Comments:

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

Objective evidence

observed:



Other findings

Other Findings Outside the Scope of the Code

Nothing to report

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)

Nothing to report

Appendix 1

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

Not Applicable please x



Sedex Audit Reference: 2022P

Photo Form









Sedex Audit Reference: 2022Pic



Report reference: GCL



Sedex Audit Reference: 2022PKI



Photos of Non- Compliances:

10-09-2022		
NC Photo # 1: Noted during factory visit that one electrical panel in building two at knitting section on ground floor was found without safety warning sign and rubber mat under electrical panel.	NC Photo # 2: Noted during factory visit that workers working in knitting section in building two on ground floor were not using PPEs i.e Dust mask, Safety shoes and Ear plugs.	NC Photo # 3: Noted during factory visit that one fire extinguisher in building one in finishing section on ground floor was found blocked by work in process fabric bags.
10-09-2022	Nil	Nil
NC Photo # 4: Noted during factory visit that one sewing machine out of forty sewing machines in building one in sewing section on first floor, was found without eye guard.		





For more information visit: Sedexglobal.com

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

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

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

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