




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 402434555	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 402491671
Business name (Company name):	Sagacious Fashions Ltd		
Site name:	Sagacious Fashions Ltd		
Site address: <i>(Please include full address)</i>	74/1, Degerchala Road, National University, Gazipur Sadar, Gazipur	Country:	Bangladesh
Site contact and job title:	Md. Nuruzzaman- Assistant Manager HR & Compliance		
Site phone:	+88258957501	Site e-mail:	info@sagaciousfashion.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	March 30, 2023		

<b>Audit Company Name &amp; Logo:</b>  	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i>  <b>Sagacious Fashions Ltd</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact [grievance@sedex.com](mailto:grievance@sedex.com).

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): For Muslim month of Ramadan, factory is starting from 7:00 am to 3:30 pm. Thus, auditor also start the audit early to complete the audit before factory's closing time

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

Lead auditor: Raunak Parvin	APSCA number: RA 21702831
Lead auditor APSCA status: In Good Standing	
Team auditor: Hassan Prince	APSCA number: RA 21702599
Zahidun Nabi	APSCA number: ASCA 21702554
Interviewers: Hassan Prince	APSCA number: RA 21702599
Raunak Parvin	APSCA number: RA 21702831/
Zahidun Nabi	APSCA number: ASCA 21702554

Report writer: Zahidun Nabi

Report reviewer: Mickie Huang, Report Reviewer

Date of declaration: March 30, 2023

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

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

## Summary of Findings

Issue <i>(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.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	4	0	0	NC <ol style="list-style-type: none"> <li>1. The factory does not have any Fire safety plan from Bangladesh Fire Service and Civil Defence Authority of Bangladesh.</li> <li>2. Workers are not using head scarf at the cutting section.</li> <li>3. Health and safety risk assessment conducted, but not sufficient as risk assessment does not cover the sharp button attach machine properly</li> <li>4. Damaged insulation for electrical wiring observed inside 01 out of 02 randomly checked first floor of shed 1</li> </ol>

4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	NC 1. The factory was unable to record annual leave information in the service book which is legally required to write in employees service book
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10B4	<u>Environment 4-Pillar</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2	0	0	NC 1. Facility does not have any reduction targets in place for environmental aspects e.g., water consumption and discharge, waste, energy, and greenhouse gas emissions for continuous improvement 2. Water usage or extraction permit is expired as per legal requirement. Last permission expired on dated 30-Jun-22
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	

**General observations and summary of the site:**

The site was established in 2007 and produced all kinds of Knitted garments items. The factory's compliance has been managed by Md. Nuruzzaman- Assistant Manager HR and Compliance.

The plant is consisting of one production buildings with extension shed, one knitting shed mainly (See description below). The land and buildings are rented by the factory management.

The 4-pillar audit was performed over 2.5 onsite days by 3 auditors in one day. This included interviews and records inspection of 26 workers. Workers interviewed were including both male and female. All workers were favourable towards the company.

They enjoyed the work and stated it was a friendly environment. Pay was always accurate and paid on time; no issues with the pay slips were noted. Also, they stated that they felt comfortable in approaching with any concerns they had.

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

## Site Details

Site Details											
A: Company Name:	Sagacious Fashions Ltd										
B: Site name:	Sagacious Fashions Ltd										
C: GPS location: (If available)	GPS Address: 74/1, Degerchala Road, National University	Latitude: 23° 57' 47.86342" N Longitude: 90° 23' 8.12312" E									
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license/Factory License: 18043/Gazipur, license is valid up to 30-Jun-23 and category F Trade license: License no 32.140/9-10-18, license is valid up to 30-Jun-23										
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Knit Garments manufacturing unit Process: Knitting, Cutting, Sewing, Finishing, Packing										
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Sagacious Fashions Ltd is located in 74/1, Degerchala Road, National University, Gazipur, Bangladesh. The production area of the factory is 36120 square feet. The facility had operated in the existing location since 2007.</p> <p>A total of 400 employees were currently working in the facility, which includes 140 male and 260 female employees. All permanent workers were hired by the facility directly. No temporary workers onsite. All the people are local Bangladeshi citizen.</p> <p>The employees worked for 6 days a week and Wednesday is off day. General working hour started from 8:00 am to 5: 00 pm with 1 hour lunch break from 1 pm to 2 pm. For Muslim month of Ramadan, factory is starting from 7:00 am to 3:30 pm. Knitting and Security section operates in 3 shifts (6:00 am to 2:00 pm/2:00 pm to 10:00 pm/10:00 pm to 6:00 pm)</p> <p>Employees' wages were calculated on hourly rate with monthly salary basis. No piece rate workers onsite. Wage is paid by cash and within 7th days after end of pay period. There is not specific peak or off season reported in last 12 month.</p> <p>No dormitory for workers</p> <table border="1" data-bbox="655 1659 1485 1926"> <thead> <tr> <th>Building #</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Building # 1</td> <td>[Main production building-RCC</td> <td></td> </tr> <tr> <td>Ground</td> <td>General store, fabric store, child care room, doctor room, time section, security post, parking area</td> <td></td> </tr> </tbody> </table>		Building #	Description	Remark, if any	Building # 1	[Main production building-RCC		Ground	General store, fabric store, child care room, doctor room, time section, security post, parking area	
Building #	Description	Remark, if any									
Building # 1	[Main production building-RCC										
Ground	General store, fabric store, child care room, doctor room, time section, security post, parking area										



	1st	Finishing, packing, finished goods area	
	2nd	Sewing section	
	3rd	Sewing	
	4th	Office, cutting	
	5th	Spot removing room, sample room, pairing section, dining, canteen, prayer room	
	Is this a shared building?	No	
Shed 1		[Utility]-RCC	Remark, if any
Ground		Electrical area, compressor room, knitting section, yarn store, collar and cuff section,	
1st		Security guards' room for rest	
Is this a shared building?		No	
Shed 2		[Knitting]-RCC	Remark, if any
Ground		Knitting section.	
Is this a shared building?		No	
<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: None observed</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details:                      The factory has a machine layout plan approval from the chief factory inspector. The approval date is 9-Oct-21 by the chief factory inspector.</p>			
G: Site function:		<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer	

	<input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	No specific peak or off-peak season reported by the management.
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Product category is knitted garments items Production process is Knitting, Cutting, Sewing, Finishing, Packing
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation Note: There is one security guards rest room who work at night in the shed 1
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details: N/A

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 08:00am A2: Day 1 Time out: 02:30 pm	A3: Day 2 Time in: A4: Day 2 Time out:	A5: Day 3 Time in: A6: Day 3 Time out:
B: Number of auditor days used:	2.5 man days (3 auditors on one day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Nuruzzaman- Assistant Manager HR & Compliance		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	January 21, 2021		
J: Previous audit type:	Full Initial		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives
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	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not applicable		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No Trade Union onsite		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	140	0	0	0	0	0	0	140
Worker numbers – female	260	0	0	0	0	0	0	260
Total	400	0	0	0	0	0	0	400
Number of Workers interviewed – male	10	0	0	0	0	0	0	10
Number of Workers interviewed – female	16	0	0	0	0	0	0	16
Total – interviewed sample size	26	0	0	0	0	0	0	26

A: Nationality of Management	Bangladesh	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: Bangladesh</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p> <p>No peak or off-peak season reported</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 100%</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: 100% hourly paid workers</p> <p>D2: _____% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: 100% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 2      D2: Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	On time wage payment, management cooperations
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Workers expressed that they sometimes wanted to work extra to earn more money. However last one year overtime is very low to get extra money. Overtime is voluntary always.
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, please give details:	

The factory had conducted living wage survey as per requirement of BSCI. There is grievance satisfaction survey among workers

**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*

A total of 26 workers were selected for interview including 10 males and 16 female employees. They were interviewed 6 individual and 4 groups of 5. Of which 5 interviewed workers were focusing specially on Environment 4-Pillar and Business Ethics section.

The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory, and they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect.

They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns. There is workers association reported with free and fair election. Workers can use complaint box if any confidential issue needs to be reported anonymously.

**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*

Interviews with the worker's committee members suggested that there was free and fair election on 26-Dec-22 and approved by the Department of Labor Bangladesh. Meeting conducted every other 2 months. Management listens their requests. Last meeting was conducted on 6-Mar-23 and there is practice sending this to Labor office for acknowledgement. Worker committee reps were satisfied with the working conditions, and they stated that they could give suggestions on all parts of the site's practices.

No trade union reported for this factory.

**O: Attitude of managers:**

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

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had recently implemented a Health & Safety committee to take care of health and safety concerns.

There is written policy on social compliance. There is separate policy on child Labor, forced Labor, Ethical business behaviour, environment, freedom of association etc.

Mr. Nuruzzaman and his team are responsible for implementing legal and code standards. He is accompanied with Md. Dulan Sheikh- DGM (Admin and Operations)

The factory provided minimum wage as per the government minimum wage notice for Garments Industries. Overtime is paid at 200% of basis.



## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

The factory has a policy on human rights and this policy is posted on notice board. There is company website where this is also posted. The policy is shared with their suppliers and all the relevant stakeholders.

Md. Nuruzzaman - Assistant Manager HR & Compliance is the designated person responsible for implementing standards concerning Human rights. There is supply chain and stake holder mapping done and they evaluate the suppliers annually for performance including social compliance and human rights issue. If any issue detected in internal audit, they have remediation process. The factory has also confidential policy not to disclose identity of any reporters without fear of reprisals towards the reporter. The terms and conditions for employees are stated in the employee handbook and there is regular training on grievance procedure.

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

Details:

Factory policy

Employees handbook

Supplier and sub supplier monitoring policy

Internal audit for suppliers

Company website

Notice boards

Any other comments:  
None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The factory has own Code of Conduct which required to respect human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Md. Nuruzzaman Job title: Assistant Manager HR &amp; Compliance</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory has confidential suggestion box in the restroom of the production floors.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The site has a HR and Compliance Room where workers personnel records are kept. That area is restricted, and only authorized person can access employee's records. Workers can access their personnel records if they request it. HR staff are the only other members of staff with access.</p>

Findings		
<p><b>Finding: Observation</b> <input type="checkbox"/></p> <p><b>Description of observation:</b></p> <p>None observed</p> <p><b>Additional elements:</b></p> <p><b>Comments:</b></p>	<p><b>Company NC</b> <input type="checkbox"/></p>	<p><b>Objective evidence observed:</b></p>

**Good examples observed:**

Description of Good Example (GE):

None observed

**Objective Evidence Observed:**

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2022 2 %	A2: This year: 2023 0.5 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> 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 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2022 1 %	C2: This year: 2023 1 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Management keeps a record of any accidents. Last minor injury reported on dated 5-Mar-23 and treatment was given by doctor. Half yearly injury summary was submitted to Labor department on dated 21-Jan-23.	
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: 2022 Number: 2	F2: This year: 2023 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]	1 minor injuries No major accident and injury reported in last 90 days	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers
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**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:**  
 The factory has given responsibility for meeting the legal and client code requirements to Md. Nuruzzaman- Assistant Manager HR & Compliance. The factory has valid license to operate this business unit in Bangladesh. All the required licenses are found valid and updated. The factory is under BSCI audit scheme for social. There is also quality monitoring system. Implementation of any necessary changes was then given to the individual department heads after agreement with the factory management.

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

Details:  
 Internal audit documents for social, Occupational health and safety  
 ETI Base code awareness training was done on dated 9-Mar-2023 and ETI code of conduct posted at the factory in local language.  
 A manual created by the factory which contained all required documents and all appropriate procedures for meeting the client's code of conduct and the legal requirements

Any other comments: None

<b>Management Systems:</b>	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: No fine reported
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: There are Policies on Forced labour, Health and Safety, Living Wage,

	Working Hours, No harsh treatment, Environment and Business Ethics
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	<p>Policies were communicated to workers via posted notice boards and annual training. Through documents review and workers interview, policy related to Forced Labor, Health and Safety, Living Wage, Working Hours, no harsh treatment, Environment and Business Ethics are communicated in orientation training. The policies are also posted in notice boards.</p> <p>Workers stated no forced Labor, no child Labor was found (through interview and document checks), there were both female and male among management/supervisors.</p>
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: The factory provided different types of training to supervisor and management on forced labour, child labour and discrimination, harassment, and abuse. Last training was conducted on dated 19-Mar-23</p>
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Training on local law including discrimination, legal rights, harassment, and abuse etc. was conducted on dated 19-Mar-23. Workers are aware on this</p>
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).	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F1: Please give details: BSCI audit was conducted in December 30, 2020 and valid up to 2 years.</p>
G: Is there a Human Resources manager/department? If Yes, please detail.	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: Please give details: Md Nuruzzaman- Assistant Manager Human Resources and Compliance Department</p>
H: Is there a senior person / manager responsible for implementation of the code	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: Please give details: Md Nuruzzaman- Assistant Manager Human Resources and Compliance Department</p>
I: Is there a policy to ensure all worker information is confidential?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>I1: Please give details: There is policy on the confidentiality of personal data.</p>

<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      J1: Please give details: Only authorized persons can access the confidential information like personal file and other information (National ID card copy, Birth certificate etc.)</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      K1: Please give details: The site delivered internal audits on regular basis as well as 3rd party customer audits (e.g. BSCI).                      There is survey among workers in regular basis.                      There is also risk assessment document updated annually.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      L1 Please give details: The factory has taken initiative to implement issues find in internal audit and risk assessment. Md. Nuruzzaman was assigned to remediation process.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      M1: Please give details: There is supplier selection policy for sub supplier and suppliers. They have done internal audit among the significant suppliers. Records are kept by the compliance team.</p>
<p><b>Land rights</b></p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      N1: Please give details: The factory has permit for construction and use of the land as industrial facility. The factory has permission from factory inspector for construction. There is also no objection from Department of Environment</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      O1: Please give details: These were performed by the factory's legal staff to accepted procedures for due diligence.</p>
<p>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</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                      P1: If yes, how does the company obtain FPIC:                      There is land rights policy. The factory has valid permission from the government for use the land as an industrial facility.</p>

<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Q1: Please give details: The factory has valid permission from the government to sue the land.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  R1: Please give details: This area where the factory located was permitted as industry usage by governmental department</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  S1: Please give details: All the areas of factory were legal according to the interview and document review.</p>

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI/Additional Elements  <input type="checkbox"/> NC against customer code:                   None observed   <b>Local law and/or ETI requirement:</b>   <b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p>

Observation:	
<p><b>Description of observation:</b>                  None observed   <b>Local law or ETI requirement:</b>   <b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b>                  None observed</p>	<p><b>Objective evidence observed:</b></p>



**1: Freely Chosen Employment**

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

**ETI**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

There is company policy on forced Labor and available for review.  
 The workers must present their IDs for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.  
 The employee rule and instruction in handbook – given to new joiner's stated that:  
 2 months' notice should be given for resignation as per law after confirmation  
 Wage should be given withing legal timing requirements  
 The workers are free to leave the workplace after end of working hour shifts  
 Minimum wage should be given to workers  
 There is no instruction of clause for forced Labor is found

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

Details:  
 Personnel files for workers with copy of workers national ID card or birth registration document  
 Resignation records  
 Factory rules  
 Employee handbook  
 Management and worker interview  
 Contracts for security guards

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  C1: If yes, please give details and category of worker affected:</p>

D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: This factory is in Bangladesh
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: There is risk assessment on forced labour. There is also evaluation of suppliers.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The factory has written policy and risk assessment.

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <input type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:	<b>Objective evidence observed:</b>
None observed	
<b>Local law and/or ETI requirement:</b>	
<b>Recommended corrective action:</b>	

Observation:	
<p><b>Description of observation:</b></p> None observed	<b>Objective evidence observed:</b>
<b>Local law or ETI requirement:</b>	
<b>Comments:</b>	

<b>Good Examples observed:</b>
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Description of Good Example (GE):	Objective evidence observed:
None observed	

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

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

There was no union at the site, but workers had the right to join a union if they wish, there is alternative workers participation committee onsite. Workers association Election was conducted on 26-Dec-22 and approved by the Department of Labor Bangladesh. There is regular meeting with workers association is recorded. Last meeting was conducted on 6-Mar-23 and there is practice sending this to Labor office for acknowledgement

Worker interview confirmed that the members of the worker's committee had been elected by fellow workers.

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

Details:

- Minutes of the works committee meeting
- Site policy on freedom of association
- Interview with workers
- Interview with worker's committee members
- Interview with managers

Any other comments: None

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

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Confidential suggestion box communication  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: There is meeting room provided to worker association on demand. Not interfere by the management as reported by the workers association members	
F: Name of union and union representative, if applicable:		F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers Participation Committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Workers are aware of the election and there representative.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 26-Dec-22
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 3 (2 females and 1 male)	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Worker's participation committee members regularly meet with management and there are records of meeting minutes. The meeting minutes are also sent to government Labor office for acknowledgement.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA

<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <input type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<p><b>Objective evidence observed:</b></p>

Observation:	
<p><b>Description of observation:</b></p> None observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> None observed	<p><b>Objective evidence observed:</b></p>

**3: Working Conditions are Safe and Hygienic**

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

General Health and Safety management- Md. Nuruzaman- Assistant Manager HR & Compliance is the main key person for health and safety management system.  
 Potable water was freely available in all areas with regular drinking water test report  
 Sufficient clean toilets segregated by gender were available at all the time to workers  
 Ventilation, temperature, and lighting were adequate for the production processes  
 Minutes of meetings showed monthly meetings between the safety committee (workers)  
 Fire Safety license from the fire service documented and there were 2 exits for each work floor. All the exits are clearly marked and there are aisles marking. No blockage observed.  
 Fire-fighting equipment was adequate, and checks were up to date  
 Evacuation plot plan were posted in all areas and understood by all workers interviewed  
 Fire drills were organized every month for each shift. There is also fire drill record observed with Bangladesh Fire Service Department.  
 Electrical safety- All electrical equipment was in good condition such as sockets, plugs, switches, and main fuse boards except in one area (See NC). There are also competent electricians at the site and their validity of permit are reviewed.  
 Material Safety Data Sheets were available and there were hazard diagrams on any chemicals which needed careful handling. Workers in the spot removing section confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.  
 Medical services- There were adequate first aid kits in each production area, and they were well stocked. There is onsite medical facility full time for workers. There is also agreement with local hospital in case of emergency.

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

Details:

**License document-**

Certificate of incorporation: Established on dated 27-Jun-2007  
 Business license/Factory License: 18043/Gazipur, license is valid up to 30-Jun-23 and category F  
 Trade license: License no 32.140/9-10-18, license is valid up to 30-Jun-23

Construction approval/Factory lay out plan from factory inspector/BEPZA  
 Fire License: DD/Dhaka/25594/2015, fire license is valid up to 30-Jun-23, approval given for 36120 square feet.  
 Boiler license (Screen shot from web): BB8762, license is valid up to 24-Aug-23.  
 Boiler operator's Competency certificate: Certificate no 5397  
 Electrician's Competency certificate: 2 Electrician (License no E20220028552, valid up to 24-Oct-25 and E20220028451 valid up to 24-Oct-25)  
 Environmental clearance Certificate: The factory is with manufacturing process of knitting, cutting, sewing, finishing and does not require to have clearance certificate from department of Environment.  
 Environmental Impact Assessment Report and report for air/stack emission, noise etc.: Reviewed. Last assessment was conducted on dated 14-Nov-22  
 Wastage collector agreement: Ms. Faruque Enterprise  
 Group Insurance Records (Insurance Certificate and Biometric registration Screen shot from web):  
 Factory registration no 6126, Insurance is valid up to 31-Dec-23  
 Drinking Water Test Report: Last test conducted on dated 24-Oct-22 and all the parameters are within the limit.

**Training Document-**

Fire Drill record: Last fire drill conducted on dated 10-Nov-22 with fire service and civil defense authority of Bangladesh. Total participant was 375 and evacuation time was  
 Training records for fire fighters with List of fire response team: Last firefighting training by internal fire team was conducted on dated 7-Mar-23.  
 Last external fire training by Bangladesh Fire service and Civil Defense authority was conducted on dated 16-Feb-23.  
 Training records on First Aider with list of aiders: Last first aid training was conducted on dated 5-Mar-23  
 Training on ETI Base code: 9-Mar-23  
 Occupational Health and safety training: Last training was conducted on dated 21-Mar-23  
 PPE training: Last training was conducted on dated 16-Mar-23  
 Training on local law including discrimination, legal rights, harassment, and abuse etc. was conducted on dated 19-Mar-23  
 New workers orientation training: Reviewed  
 Safety committee approval and meeting minutes: Last meeting of safety committee was conducted on dated 11-Feb-23  
 Accident- Injury records with analysis report: Last minor injury reported on dated 5-Mar-23 and treatment was given by doctor. Half yearly injury summary was submitted to labor department on dated 21-Jan-23.  
 Medical room attendant's personal file: Nurse Khairun Nahar  
 Doctor's personal file: Dr. Sadia Afrin Bannya, BMDC registration no#80020  
 Agreement with the Hospital/ clinic: Tairunessa Memorial Medical Collage & Hospital- Kunia, Targas, BoardBazar, Gazipur, Bangladesh  
 Risk Assessment documents

Any other comments: None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  A1: Please give details: The site had a H&amp;S assistant manager and a H&amp;S committee who met regularly – evidence of actions</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>



	<p>B1: Please give details: Each employee received an employee handbook at induction, and a copy was posted on the notice board of the factory. This handbook included all available policies. Workers are provided with training on occupational health and safety.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            C1: Please give details: No extension observed without permission.</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            D1: Please give details: Visitors are given summary of evacuation process.</p>
<p>E: Is a medical room or medical facility provided for workers?             If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            E1: Please give details: The factory has medical facility for workers onsite. The medical centre is in main building. There is one registered doctor onsite. The medical room is set up as per law based on worker's number.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            F1: Please give details:            Medical room attendant's personal file: Nurse Khairun Nahar            Doctor's personal file: Dr. Sadia Afrin Bannya, BMDC registration no#80020            Agreement with the Hospital/ clinic: Tairunessa Memorial Medical Collage &amp; Hospital- Kunia, Targas, BoardBazar, Gazipur, Bangladesh</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            G1: Please give details: No transport provided for workers. All workers resident nearby. Main mode of transport is public bus, scooter and other public vehicles.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            H1: Please give details: No personal storage space is given</p>
<p>I: Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            I1: Please give details: The factory has detailed H&amp;S risk assessment including occupational health and safety including working for extended working hours.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            J1: Please give details: No wastages are released directly to environment.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No            K1: Please give details: The factory does not use any banned chemical.</p>

**Non-compliance:**

**1. Description of non-compliance:**

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

Through onsite visit and management interview, it was noted that the factory does not have any Fire safety plan from Bangladesh Fire Service and Civil Defence Authority of Bangladesh [Ministry of Labour & Employment Reminder No.Shrop/Con/ CMC (Part -2)/2012/241(3) dated July 1, 2012]

**Local law and/or ETI requirement:**

**Local law:**

Ministry of Labour & Employment Reminder No. Shrop/Con/ CMC (Part - 2)/2012/241 (3) dated July 1, 2012- A fire safety plan should be arranged for each floor every factory building.

**ETI requirement:**

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.

**Recommended corrective action:**

The factory is recommended to obtain fire safety plan.

**2. Description of non-compliance:**

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

During the walkthrough, it was observed that lot of dust is produced from the fabrics and those are accumulated all over the floor as well as on workers' head. However, workers are not using head scarves at the cutting section. All the workers found using face masks. [Bangladesh Labour Code (2006), Amendment (2013),78 (a). Mandatory use of personal protective equipment]

**Local law and/or ETI requirement:**

**Local law:**

Bangladesh Labour Code (2006), Amendment (2013),78 (a). Mandatory use of personal protective equipment- In an applicable case, an employer shall not engage any workers in work without providing and ensuring use of personal protective equipment, and in doing so, a record book shall be maintained as designated by the owner.

**ETI requirement:**

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.

**Recommended corrective action:**

The factory is recommended to ensure employee are using dust head cover.

**Objective evidence observed:**

1. Management interview

3. Onsite observation  
NC photo 1

<p><b>3. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>Through document review, it was noted that Health and safety risk assessment conducted, but not sufficient as risk assessment does not cover the sharp button attach machine properly. There is no risk assessment conducted about the harm associated with sharp parts if fallen on the floor and workers are working bare footed</p> <p><b>Local law and/or ETI requirement:</b>  <b>Local law:</b>          Bangladesh Labor Rules 2015 -Sixth Chapter-Safety Rule 67- Safety measures and health safety must be arranged in accordance with the directions of this Rule or the regulations of the concerned government department for the workers who are employed in the procedures of manufacturing processes that have high risks of physical injury or loss.</p> <p><b>ETI requirement:</b>          3.1- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b>          It is recommended to conduct risk assessment for sharp button operations process</p>	<p>3. Document Review NC Photo 2</p>
<p><b>4. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>Through onsite tour, damaged insulation for electrical wiring observed inside 01 out of 02 randomly checked first floor of shed 1.</p> <p><b>Local law and/or ETI requirement:</b>  <b>Local law:</b>          Bangladesh Labor Rules 2015 -Sixth Chapter-Safety Rule 58 (7)- All of the electric wiring and switch boards have to be installed by the insulated materials through 'conceal wiring'.</p> <p><b>ETI requirement:</b>          3.1- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b>          It is recommended to ensure electrical safety</p>	<p>4. Onsite tour NC photo 3</p>

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>  None observed	<b>Objective Evidence Observed:</b>

**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:**

There is recruitment policy for hiring. As per the policy the factory asks to show the original national ID card or birth certificate for verification of worker's age. After verification they returned the original one to workers and keep one copy in personal file.

There is child Labor policy as well as remediation plan in case child is engaged accidentally.

Youngest worker in sample was found 18 years old. There is also medical check-up by registered physician for age proof.

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

Details:

Personnel files of all sample workers

Latest list of employees

Records of health checks by registered medical physician.

Any other comments: None

A: Legal age of employment:	16 to below 18 years with restrictions, 18 years and above without restrictions
B: Age of youngest worker found:	18 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details No workers under 18 years in sample

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p>

Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed</p>	<p><b>Objective Evidence Observed:</b></p>

**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:**

This factory falls under Garments manufacturing and last minimum wage was published in 2018. There is specific salary structure based on skill in Garments industries in Bangladesh.

Grade 1: 18,257 BDT/Month

Grade 2: 15,416 BDT/Month

Grade 3: 9,845 BDT/Month

Grade 4: 9,347 BDT/Month

Grade 5: 8,875 BDT/Month

Grade 6: 8,420. BDT/Month

Grade 7: 8000 BDT/Month

The factory follows this minimum wage gazette.

All workers' wages were calculated by hourly rate with monthly payment system.

The workers are provided with pay slip in local language for their understanding.

All workers were provided with written and understandable contract agreement and appointment letter which reflecting terms and conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time that they were paid.

All workers are covered under group insurance scheme

Benefits for workers are provided as annual leave, casual leave, medical/sick leave etc.

All workers were paid wage within 7 working days after end of pay period

Wages are paid by cash payment.

Note that there is a gap in living wage of this region and provided minimum wage. As per the data of GLWC (Global Living Wage Coalition) for Bangladesh, estimated living wage is 19255 BDT per month of this satellite city. However, the factory provided minimum wage as described in this section. The factory has conducted on living wage survey.

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

Details:

Document review

Worker interview

Local and national laws

Wages and benefits policy

<p>Local legal minimum wage documents          Payroll records from March 2022 to February 2023          Leave records          Group insurance records</p> <p>Any other comments: None</p>
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<b>Non-compliance:</b>	
<p><b>1. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input checked="" type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>Through annual leave record and annual leave cash payment record review, it was noted that factory provided annual leave and gave cash money against unspent annual leave as per law. However, the factory was unable to record this information in the service book which is legally required to write in employees service book.</p> <p><b>Local law and/or ETI requirement:</b>  <b>Local law:</b>          Bangladesh Labour Code (2006), Sec.7- The service book shall have the following details- Leave availed</p> <p><b>ETI requirement:</b>          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</p> <p><b>Recommended corrective action:</b>          It is recommended to record the leave in service book</p>	<p><b>Objective evidence observed:</b>          1. Document review          NC Photo 4</p>

<b>Observation:</b>	
<p><b>Description of observation:</b>          None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

<b>Good Examples observed:</b>	
<p><b>Description of Good Example (GE):</b>          None observed</p>	<p><b>Objective Evidence Observed:</b></p>

## Summary Information



Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day, 48 hours per week	A1: 8 hours per day, 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours per day, 12 hours per week	B1: 2 hours per day, 12 hours per week	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Grade 1: 18,257 BDT/Month Grade 2: 15,416 BDT/Month Grade 3: 9,845 BDT/Month Grade 4: 9,347 BDT/Month Grade 5: 8,875 BDT/Month Grade 6: 8,420. BDT/Month Grade 7: 8000 BDT/Month	C1: Grade 1: 18,257 BDT/Month Grade 2: 15,416 BDT/Month Grade 3: 9,845 BDT/Month Grade 4: 9,347 BDT/Month Grade 5: 8,875 BDT/Month Grade 6: 8,420. BDT/Month Grade 7: 8000 BDT/Month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of basic wage	D1: 200% of basic wage	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If <b>No</b> , why not?	No inconsistency noted
B: Sample Size Checked <i>(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)</i>	26 samples from February 2023 (current) 26 samples from January 2023 (random) 26 samples from May 2022 (randomly selected)

<p>C: Are there different legal minimum wage grades? If <b>Yes</b>, please specify all.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If <b>Yes</b>, please give details:            Grade 1: 18,257 BDT/Month            Grade 2: 15,416 BDT/Month            Grade 3: 9,845 BDT/Month            Grade 4: 9,347 BDT/Month            Grade 5: 8,875 BDT/Month            Grade 6: 8,420. BDT/Month            Grade 7: 8000 BDT/Month</p>	
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details:</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>            Grade 1: 18,257 BDT/Month            Grade 2: 15,416 BDT/Month            Grade 3: 9,845 BDT/Month            Grade 4: 9,347 BDT/Month            Grade 5: 8,875 BDT/Month            Grade 6: 8,420. BDT/Month            Grade 7: 8000 BDT/Month</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: 0% of workforce earning under minimum wage            F2: 40% of workforce earning minimum wage            F3: 60% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found:            No such bonus scheme found.            However mandatory festival bonus is given two times in a year during Muslim festival of Eid. This is equivalent of Basic in each Eid festival.</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Absent Deduction</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Absent Deduction            Please describe:            For any unauthorized absent days factory can deduct salary of workers for each day. This is equivalent of basic wage divided by 30 for each day.</p>
		<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1.            2.            Please describe: No such point.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>L1: Please give details: All the working hours are recorded in workers time records. Time records is automated face scanning system.</p>	
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>M1: Please specify amount/time: 19255 BDT/Month for satellite city.</p>	
<p>M2: If yes, what was the calculation method used.</p>	<input checked="" type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <p>Other – please give details:</p>	
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>N1: Please give details: The government has instructed to increase 5% of basic for 1 year of completion of service length. The factory follows this.</p>	
<p>O: Are workers paid in a timely manner in line with local law?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>P1: Please give details: Through factory rules review, payroll records review and employee interview, it was confirmed that equal rates were being paid for equal work.</p>	
<p>Q: How are workers paid:</p>	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other <p>Q1: If other, please explain:</p>	

**6: Working Hours are not Excessive**

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

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

Through employees' interview, overtime was voluntary. The factory provided hours and wages records from March 2022 to February 2023. Among them auditor selected February 2023; January 2023 & May 2022 for sample checking. No peak and off-peak season is reported.

Time recording system is face scanning system for each employee while starting the shift and end of shift. According to time records and worker interview, general working hour is 8 hours per day and 48 hours per week with no more than 2 hours overtime per day. General working hour started from 8:00 am to 5:00 pm with 1 hour lunch break from 1 pm to 2 pm. For Muslim month of Ramadan, factory is starting from 7:00 am to 3:30 pm. Knitting and Security section operates in 3 shifts (6:00 am to 2:00 pm/2:00 pm to 10:00 pm/10:00 pm to 6:00 pm)

Wednesday is weekend for all workers.

Total overtime was found 4 hours in a week maximum as per law.

No lack of 7th day rest is observed.

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

Details:

- Employee interview
- Management interview
- Local and national laws
- Factory policy on working hours
- Timecards
- Computerised time logging system
- Sample pay slips with recorded hours all workers interviewed
- Workers' contracts
- 12 months' hours records to establish highest and lowest hours over all employees
- Quality and production records to cross check hours

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

- NC against ETI/Additional Elements
- NC against customer code:
- NC against Local

None observed

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

**Observation:**

**Description of observation:**

None observed

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

**Good Examples observed:**

**Description of Good Example (GE):**

None observed

**Objective Evidence Observed:**

**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: Automated face scanning system	
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details	
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
		If "Other", Please define:
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	6 days in a row	
Standard/Contracted Hours worked		
	<input type="checkbox"/> Yes	G1: If yes, % of workers & frequency:

G: Were standard working hours over 48 hours per week found?	<input checked="" type="checkbox"/> No	
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours in a day and 12 hours in a week	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	70%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i> Overtime is voluntary for all workers
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</i> 100% fixed rate workers are paid 200% of basic rate
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i> 100% fixed rate workers are paid 200% of basic rate Frequency is monthly along with regular wage
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	

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



**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

There are no apparent or reported concerns regarding discrimination in any form at the facility. The facility has a written Equal Employment Opportunity policy in the employee information guide which describes that they offer opportunities to all employees and qualified applicants without regard to their race, colour, religion, sex, national origin, age, or any other characteristic protected by the law. In addition, the company prohibits and has zero tolerance for harassment in all forms and undertakes affirmative action to ensure that employees and qualified applicants are treated without regard to race, gender, disability, or veteran status. No employees in interviews reported any form of discrimination.

The factory has project of disabled person recruitment and total 6 disable person currently working at this factory. They have paid cost for disabled person/physically challenged training by one organization. After training they recruit as permanent employee.

There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement. During the assessment, there is no deviation found in compensation, benefits, hiring procedure, job assignment, retirement provision, and access to service etc. between employees with regards to age, caste, disability, gender, political affiliation, race, religion, social background, or other personal characteristics. There is no evidence that women are mistreated or fired because of being pregnant. Moreover, no evidence was found that employees are disciplined, dismissed, or otherwise discriminated against because they complain against infringements of their right. Therefore, all the employees are treated equally by the facility at the time of assessment.

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

Details:

- Employee interview
- Management interview
- Documents review - Hiring Policy, Training records, Benefit policy, and Termination policy.
- Equal employment opportunity and anti-discrimination policies.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 90 % A2: Female 10 %
B: Number of women who are in skilled or technical roles e.g. where specific	4

<p>qualifications are needed i.e. machine engineer / laboratory analyst:</p>	
<p>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?:</p>	<p> <input type="checkbox"/> Hiring  <input type="checkbox"/> Compensation  <input type="checkbox"/> Access to training  <input type="checkbox"/> Promotion  <input type="checkbox"/> Termination or retirement  <input checked="" type="checkbox"/> No evidence of discrimination found         </p> <p>C1: Please give details:          No evidence of discrimination observed based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>

Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>Orientation training, Machine operating training, Personal Protective Equipment usage, Fire training, First aid training, Code of conduct training etc.</p>

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p> <p>If no, please give details:</p>
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Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p> <input type="checkbox"/> NC against ETI/Additional Elements  <input type="checkbox"/> NC against customer code:         </p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p> <p style="text-align: center;"><input checked="" type="checkbox"/> NC against Local</p>

Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

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

**8: Regular Employment Is Provided**

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

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

**ETI**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

A review of the employment contracts for workers at the facility was conducted. Each worker has a signed contract and workers are also provided with a copy of their employment contract. All documents appear to be in order. All the employees working at the facility are hired directly. Factory does not engage any home workers and no apprenticeship program have been implemented in the factory. No apparent concern in this clause was observed in the current assessment.

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

Details:

Document review - Hiring Policy, Worker's Service Book, Personnel files, ID cards/Appointment letter, and Group insurance documents.

Worker interview

Management interview

Any other comments: None

**Non-compliance:**

<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p>
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Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed</p>	<p><b>Objective Evidence Observed:</b></p>

### Responsible Recruitment

All Workers	
<p>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?</p>	<p><input checked="" type="checkbox"/> Terms &amp; Conditions presented</p> <p><input checked="" type="checkbox"/> Understood by workers</p> <p><input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p>

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

<b>Migrant Workers:</b>	
<i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	Not applicable. No migrant worker recruited
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:  C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:

### NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not applicable. No agency worker recruited
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

	D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details:

<b>Contractors:</b> <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors?	No contracted workers observed
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	



**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:**

It was verified through document review, factory tour, management interview and employee interview that no sub-contracting & Homeworking was used by this factory. The management informed that they do not need subcontract generally

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

- Document Review – Sub-contract Policy, Production records, Warehouse records, Gate pass records
- Factory Tour
- Management interview
- Worker interview

Details:  
None

**Non-compliance:**

**1. Description of non-compliance:**

- NC against ETI/Additional Elements       NC against Local  
 NC against customer code:

None observed

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>
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Good Examples observed:	
<p>Description of Good Example (GE): None observed</p>	<p><b>Objective Evidence Observed:</b></p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>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</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b>, summarise details:</p>
<p>C: Number of sub-contractors/agents used:</p>	
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b>, summarise details:</p>
<p>E: What checks are in place to ensure no child labour is being used and work is safe?</p>	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
<p>A: If homeworking is being used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b>, summarise details:</p>		
<p>B: Number of homeworkers</p>	B1: Male:	B2: Female:	Total:
<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>		C1: If through agents, number of agents:

D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No  G1: Please give details:	
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details:  Facility has provided complaint or suggestion box at the toilet area where worker can submit their complain or suggestion in the confidential manner. Also, the facility has worker representative committee through which worker can raise their voice to the senior management. There is hotline number for any complain raised anonymously.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware about complaint channels and they have access. Top management, participation committee member and general workers committee's present this box open twice in a month and solved the complaint as reported interview workers. In addition, during orientation program facility management made aware about the channels and through worker representative committee members for workers are made aware.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Confidential grievance mechanism box  Complaint raised by workers participation committee &amp; Welfare officer.  In addition, during orientation program facility management made aware about the channels and through worker representative committee members for workers are made aware.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input checked="" type="checkbox"/> Communities  <input checked="" type="checkbox"/> Suppliers  <input type="checkbox"/> Other  D1: Please give details:  Workers representative committee and complaint box.  Community complaint system  Supplier complaint /Feedback receive over mail.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  E1: If yes, please give details</p>

<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>G1: If no, please explain</p>
<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

**Current Systems and Evidence Examined**

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

**Current systems:**

Interviewed employees reported receiving fair and respectful treatment. The HR department is responsible for oversight of these code elements. The factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory and the disciplinary procedure of the factory is verbal warning and education. There appears to be no concerns in this area during the assessment.

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

Details:

- Anti-harassment policy
- Threats and violence policy and procedures
- Facilities and company's code of conduct
- Disciplinary action documentation in employee personnel profiles.
- Workers Participation Committee meeting minutes.
- Compliant box register

Any other comments: None

**Non-compliance:**

<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p>
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Observation:	
<p><b>Description of observation:</b></p> <p>None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p><b>Description of Good Example (GE):</b></p> <p>None observed</p>	<p><b>Objective Evidence Observed:</b></p>

**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:**

Only workers with a legal right to work is employed or used by the factory. There are no agency staffs, employment agencies and immigration workers in the factory. There appears to be no concerns in this area during the assessment.

No foreign nationals appeared to be employed onsite. All 26 employees in the sample were documented. The facility management reported verifying the original documentation and keep copy of original documents.

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

- Details:  
 Factory tour  
 Document review- Policy  
 Worker interview  
 Management interview  
 Employee-signed wage and job description letters  
 Identification photocopies of employment document

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

- NC against ETI/Additional Elements       NC against Local  
 NC against customer code:

None observed

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

**Observation:**

<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>
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<b>Good examples observed:</b>	
<p><b>Description of Good Example (GE):</b> None observed</p>	<p><b>Objective Evidence Observed:</b></p>

**10. Other issue areas 10B4: Environment 4–Pillar**  
[\(Click here to return to summary of findings\)](#)  
*To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar*

**B.4. Compliance Requirements**

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

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

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

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

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

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

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

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

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

**B4. Guidance for Observations**

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

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

*Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in*



place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

**Current Systems and Evidence Examined**

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

**Current systems:**

The factory is with production process of Knitting, Cutting, Sewing, and finishing. This type of industry does not require to have any Environmental Clearance certificate as no chemical is used. However, the factory has done Impact assessment and regularly monitor air emission, noise, temperature, humidity as per client's requirement.

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

Details:

- Environmental policy
- Management interview
- Wastages containers checking
- Wastage contractor agreement

Any other comments: None

**Non-compliance:**

**1. Description of non-compliance:**

- NC against ETI/Additional Elements  NC against Local
- NC against customer code:

Facility does not have any reduction targets in place for environmental aspects e.g., water consumption and discharge, waste, energy, and green-house gas emissions for continuous improvement

**Local law and/or ETI/Additional Elements requirement:**

**Additional Elements:**

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).

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

**Recommended corrective action:**

The factory should set target for reduction of water consumption and discharge, waste, energy, and green-house gas emissions.

**2. Description of non-compliance:**

- NC against ETI/Additional Elements  NC against Local
- NC against customer code:

**Objective evidence observed:**

1. Management interview

2. Management interview  
NC Photo 5

<p>Through document review and management interview, it was noted that water usage or extraction permit is expired as per legal requirement. Last permission expired on dated 30-Jun-22.</p> <p><b>Local law and/or ETI/Additional Elements requirement:</b>  <b>Local law:</b>          Gazipur City Corporation regulation- Water extraction permit shall be valid  <b>Additional elements:</b>          10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</p> <p><b>Recommended corrective action:</b> The management was recommended to renew the water extraction permit.</p>	
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Observation:	
<p><b>Description of observation:</b> None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good examples observed:	
<p><b>Description of Good Example (GE):</b> None observed</p>	<p><b>Objective Evidence Observed:</b></p>

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Md. Nuruzzaman- Assistant Manager HR & Compliance
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The factory EIA report is done in the year 2018 and the factory has taken steps as per the assessment report.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: The factory does not have any ISO 14001 management system. However, they have internal Environmental policy implemented.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Policy is available in notice board and available at their website.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The factory has improvement plan for impact they have done on environment but not in writing and did not monitor it. See NC
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: No such FSC/MSC engagement reported.
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The factory is with production process of Knitting, Cutting, Sewing, and finishing. This type of industry does not require to have any Environmental Clearance certificate as no chemical is used. However, the factory has done Impact assessment and regularly monitor air emission, noise, temperature, humidity as per clients requirement
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A I1: Please give details: No such hazardous chemical need for production.

J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility ensures client's requirements and legislation in the destination countries regarding environmental and chemical issues through third party testing during production. Mostly those are requirement by the client.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has consumption monitoring for energy and water. There is no set target for the reduction of water, consumption.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Facility has waste recycling process. They send the main waste (Fabric) to recycler.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Electricity consumption records are maintained on monthly basis. Water consumption records are maintained by water in-flow and out-flow meter.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable as there is no sub-contractor required for the production.

**Usage/Discharge analysis**

Criteria	Previous year: 2022	Current Year: 2023
Electricity Usage: <i>Kw/hrs</i>	3565	322
Renewable Energy Usage: <i>Kw/hrs</i>	0	0
Gas Usage: <i>Kw/hrs</i>	64589.81 litre (Compressed natural gas)	16451.65 litre (Compressed natural gas)
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	N/A	N/A
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>Underground water</li> </ul>	<ul style="list-style-type: none"> <li>Underground water</li> </ul>
Water Volume Used: <i>(m³)</i>	4397	1055

Water Discharged: <i>Please list all receiving waters/recipients.</i>	Local city corporation drainage system	Local city corporation drainage system
Water Volume Discharged: <i>(m<sup>3</sup>)</i>	N/A	N/A
Water Volume Recycled: <i>(m<sup>3</sup>)</i>	0	0
Total waste Produced <i>(please state units)</i>	111316 KG	1000 KG
Total hazardous waste Produced: <i>(please state units)</i>	0	0
Waste to Recycling: <i>(please state units)</i>	111316 KG	1000 KG
Waste to Landfill: <i>(please state units)</i>	0	0
Waste to other: <i>(please give details and state units)</i>	0	0
Total Product Produced <i>(please state units)</i>	3040583 pcs	253,381 pcs

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

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

To be completed for a 4-Pillar SMETA Audit

**10C. Compliance Requirements**

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

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

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

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

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

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

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

**10C. Guidance for Observations**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

The facility has conducted their business ethically without bribery, corruption, or any type of fraudulent Business Practice. Management ensures all level of transparency in all the way. All the suppliers need to agree with the company policy regarding the corruption and bribery. Compliance department is in the overall responsible for overseen the implementation of the policy.

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

Details:

Policy

Management interview,

Worker interview.

Any other comments: None

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements      <input checked="" type="checkbox"/> NC against Local</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p>

Observation	
<p><b>Description of observation:</b></p> <p>None observed</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed</p>	<p><b>Objective Evidence Observed:</b></p>

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy</p> <p><input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details: There is anticorruption and business ethics policy in writing. They have also shared this to their suppliers.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>B1: Please give details: The factory provides regular training and business ethics and corruption prevention</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>C1: Please give details: The policy is changed and updated as per the local legal requirement</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

	D1: Please give details: All the suppliers have been given acknowledgement with the facility's anti-bribery and anti-corruption policy
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Other findings

Other Findings Outside the Scope of the Code
None observed on day of Assessment

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None observed on day of Assessment

## Appendix 1

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

Not Applicable please x

# Photo Form

## NC Photo

<p>NC photo 1- Dust covered over workers head at cutting section</p>	<p>NC photo 2- No floor mats provided to snap button attach machine operator</p>	<p>NC photo 3- Loose electrical wire</p>

<p>NC photo 4- Service book is not updated</p>	<p>NC photo 5- Expired water extraction permit</p>	

## General Photo

<p>Factory main gate</p>	<p>Building for production and outdoor look</p>	<p>Production areas- Cutting section</p>

<p>Production areas- Sewing section</p>	<p>Production areas- Finishing</p>	<p>Production areas- Knitting section</p>
<p>Warehouse- Accessories store</p>	<p>Warehouse- Finished goods warehouse</p>	<p>Dining area</p>
<p>Childcare of the factory</p>	<p>Toilet area</p>	<p>Drinking water station</p>
<p>Fire exits</p>	<p>First aid box</p>	<p>Fire extinguisher</p>

<p>Firefighting equipment</p>	<p>Fire hose</p>	<p>Electrical installation for Generator</p>
<p>Evacuation plans</p>	<p>PPE using</p>	



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

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

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

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

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