




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: (only available on Sedex System)	ZC: 1026021	Sedex Site Reference: (only available on Sedex System)	ZS: 1068568	
Business name (Company name):	Deccan Edibles Pvt Ltd			
Site name:	Deccan Edibles Pvt Ltd C/O Vaarad Cold Storage			
Site address: (Please include full address)	Gat No. 87/1B/1/1A/2/3, Nashik, Maharashtra-422209	Country:	India	
Site contact and job title:	Mr. Kapil Kosode – Executive			
Site phone:	+91 7875514164	Site e-mail:	deccancert@gmail.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	19 February 2022			

<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>Deccan Edibles Pvt 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): None

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

Lead auditor: Yuvraj Kalikate

APSCA number: CSCA 21702363

Lead auditor APSCA status: CSCA (In Good Standing)

Team auditor: NA

APSCA number: NA

Interviewers: Yuvraj Kalikate

APSCA number: CSCA 21702363

Report writer: Yuvraj Kalikate

Report reviewer: Pooja Nayyar-Report Reviewer-SM

Date of declaration: 19 February 2022

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

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

## Summary of Findings

Issue (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.	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	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"/>		00	00	None Observed
0B <a href="#">Management systems and code implementation</a>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	<b>Summary of Non-Compliance finding 1</b> It was noted during review of records that facility has not obtained shops & establishment license from concern authority.
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	05	00	00	<b>Summary of Non-Compliance finding 1</b> It was noted during review of records that facility has not conducted evacuation drill.  <b>Summary of Non-Compliance finding 2</b> It was noted during review of records that facility has not obtained fire NOC from concern authority.  <b>Summary of Non-Compliance finding 3</b> It was noted during site tour aisles were not marked in all the areas.

									<b>Summary of Non-Compliance finding 4</b> It was noted during site tour that fire alarm was not installed.  <b>Summary of Non-Compliance finding 5</b> It was noted during site tour that loose wiring found at electrical panel and electrical board was placed on wooden plywood.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	00	00	<b>Summary of Non-Compliance finding 1</b> Compliance status to wages & benefits section could not be verified due to facility has not maintained payroll records & In/Out time records of all the employees for any of the month. Further it was noted that facility has maintained attendance register where P is marked for present & A is marked for absent and in the same register salary of the employees calculated and paid to the group leader in cash. Further group leader distributed salary to individual employees. However no acknowledgement obtained from individual employees.
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	00	00	<b>Summary of Non-Compliance finding 1</b> Compliance status to working hours section could not be verified due to facility has not maintained payroll records & In/Out time records of all the employees for any of the month. Further it was noted that facility has



									maintained attendance register where P is marked for present & A is marked for absent.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	<b>Summary of Non-Compliance finding 1</b> Facility has not issued appointment letter to any of the employees.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	NA

General observations and summary of the site:

#### Audit Process

This initial audit was conducted by Intertek India Pvt. Ltd. There were 01 auditor, who assessed the facility's operations in 1 day (1 Auditor for 1 day). The scope of this audit was based on 2 Pillar SMETA systems.

#### Overview of opening meeting, facility management responses: -

Auditor entered the facility at 10:30 am on February 19, 2022 and conducted an opening meeting with facility management according to the ETI Base Code. Mr. Kapil Kosode – Executive, Mr. Roshan Aher – Quality Incharge, Mr. Harish – Manager & Mr. Nagesh Shetty – Director were present in the meeting and assured full co-operation to this audit.

#### Site Summary: -

- The audited site was in to Sorting, Grading, Packaging, and pre-cooling of grapes.
- Overall responsibility for meeting the standards is taken by Mr. Kapil Kosode – Executive.
- Facility has hired 66 employees (36 male and 30 female) all are directly hired. Out of 66 employees, 60 employees (30 male & 30 female) are production employees & 06 are management employees.
- The youngest worker on site was 20 years old.
- There is no union at this factory.
- The facility does not use subcontractors.
- The facility having a seasonal process which starts from January of every year and ends by April.
- 10 employees were selected for interview. Out of which 6 employees were interviewed individually and 4 employees in 01 group.
- All workers said they were satisfied with their employment at the factory.
- As per management interaction all the employees are paid by cash.
- They also said they were able to make suggestions to their supervisors and sometimes they had seen these suggestions used.
- 10 Records to show wages and hours were taken for 3 months from the period of Feb 2021 to Jan 2022.
- Wages & working hours could not be verified due to insufficient payroll records.
- Overtime was not performed at the facility. However, after interaction with the management and employees it was noted that overtime is paid 200% of wages if worked.
- The employees work for 6 days a week in with in single shift.  
The normal working hours are as follows:  
General Shift: 10:00 am to 07:00 pm  
Lunch Break: One hour – 01:00 pm to 02:00 pm  
Weekly off: Saturday & Sunday
- As per management interaction, employees' wages are calculated on monthly basis and paid on or before 07th day of the wage period.

#### Summary of Findings

##### Positive Observations:

1. Management approach towards this audit was very positive and they assured necessary steps to improve labour Standard in their facility.
2. There is no evidence of child and forced labour.
3. There is no evidence of discrimination, harassment and abuse or unfair disciplinary practices.
4. Facility treats their employees with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse.
5. The facility has documented policies for all the social elements. Facility also has documented environment, health and safety policy.
6. Overall impression of the working condition in this facility is satisfied.



**Negative Observations:**

Non-compliances were observed in the areas of “**0B: Management System & Code Implementation**”, “**03. Safety and Hygienic Conditions**”, **05: Wages & Benefits**, **06: Working Hours & 08: Regular Employment**”, section. For other areas were found free from any non-compliances. Details are given below:

**0B: Management System & Code Implementation**

Summary of Non-Compliance finding 1

It was noted during review of records that facility has not obtained shops & establishment license from concern authority.

**03: Safety and Hygienic Conditions**

Summary of Non-Compliance finding 1

It was noted during review of records that facility has not conducted evacuation drill.

Summary of Non-Compliance finding 2

It was noted during review of records that facility has not obtained fire NOC from concern authority.

Summary of Non-Compliance finding 3

It was noted during site tour aisles were not marked in all the areas.

Summary of Non-Compliance finding 4

It was noted during site tour that fire alarm was not installed.

Summary of Non-Compliance finding 5

It was noted during site tour that loose wiring found at electrical panel and electrical board was placed on wooden plywood.

**05: Wages & Benefits**

Summary of Non-Compliance finding 1

Compliance status to wages & benefits section could not be verified due to facility has not maintained payroll records & In/Out time records of all the employees for any of the month. Further it was noted that facility has maintained attendance register where P is marked for present & A is marked for absent and in the same register salary of the employees calculated and paid to the group leader in cash. Further group leader distributed salary to individual employees. However, no acknowledgement obtained from individual employees.

**06: Working Hours**

Summary of Non-Compliance finding 1

Compliance status to working hours section could not be verified due to facility has not maintained payroll records & In/Out time records of all the employees for any of the month. Further it was noted that facility has maintained attendance register where P is marked for present & A is marked for absent.

**08: Regular Employment**

Summary of Non-Compliance finding 1

Facility has not issued appointment letter to any of the employees

**Observations:**

None observed

**Good Examples:**

None observed

**Auditor Note:**

None observed

*\*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:	Deccan Edibles Pvt Ltd																			
B: Site name:	Deccan Edibles Pvt Ltd C/O Vaarad Cold Storage																			
C: GPS location: (If available)	GPS Address: N/A	Latitude: N/A Longitude: N/A																		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Not obtained.																			
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Sorting, Grading, Packaging, and pre-cooling of grapes.																			
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor</td> <td>Grapes packing, Cold storage, DG Set, Compressor</td> <td>Nil</td> </tr> <tr> <td>Floor 1</td> <td>Nil</td> <td>NA</td> </tr> <tr> <td>Floor 3</td> <td>Nil</td> <td>NA</td> </tr> <tr> <td>Floor 4</td> <td>Nil</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table> <p>The audited facility is located at Gat No. 87/1B/1/1A/2/3, Nashik, Maharashtra-422209. The facility's operations are carried out at ground floor of a single concrete building. The facility total constructed area is 10,000 sq. ft. Ground floor consists of Grapes packing, Cold storage, DG Set, Compressor.</p> <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: No such cracks 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: Facility has obtained stability certificate from competent agency.</p>		Production Building no	Description	Remark, if any	Ground floor	Grapes packing, Cold storage, DG Set, Compressor	Nil	Floor 1	Nil	NA	Floor 3	Nil	NA	Floor 4	Nil	NA	Is this a shared building?	No	NA
Production Building no	Description	Remark, if any																		
Ground floor	Grapes packing, Cold storage, DG Set, Compressor	Nil																		
Floor 1	Nil	NA																		
Floor 3	Nil	NA																		
Floor 4	Nil	NA																		
Is this a shared building?	No	NA																		

G: Site function:	<input type="checkbox"/> Agent <input 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 checked="" 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)	January to April of every year
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Receiving of grapes-Weighing-Arrival Quality Checking-Grading-Sorting-Packing-Palletizing- Pre-cooling- Dispatch
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Open door policy) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" 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
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 as no accommodation provided by the facility.

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10.30 am A2: Day 1 Time out: 6.30 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:	One Auditor x one day		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input 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 type="checkbox"/> Yes <input checked="" 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)	Mr. Kapil Kosode – Executive		
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:	N/A		
J: Previous audit type:	N/A		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	No workers committee formed and it is not required by law.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union exist in the facility and it is not required by law.		



## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	36	00	00	00	00	00	00	36
Worker numbers – female	30	00	00	00	00	00	00	30
Total	66	00	00	00	00	00	00	66
Number of Workers interviewed – male	06	00	00	00	00	00	00	06
Number of Workers interviewed – female	04	00	00	00	00	00	00	04
Total – interviewed sample size	10	00	00	00	00	00	00	10



A: Nationality of Management	Indian	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: <u>Indian</u> B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please describe how this may vary during peak periods:
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 <u>100</u> % C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: _____% hourly paid workers D2: <u>  </u> could not be verified _____% salaried workers  Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: _____% monthly paid D6: <u>  </u> could not be verified _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" 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>	1 group of 4 female employees	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 6	D2: Female: 0
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 observed	
I: What did the workers like the most about working at this site?	Based on employee's interaction, it was observed that all of them were favourable with the management and facility environment and no negative information was reported. Overall, they displayed a positive attitude towards the management and the workplace.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Workers are satisfied with the management and working hours. During the interview they confirmed that they work of their own free will. Overtime is voluntary. They are free to leave their workstation once their shift ends.	

L: Is there any worker survey information available?

☐ Yes

☒ No

L1: If yes, please give details: Not Applicable

M: Attitude of workers:

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

A total of 10 employees (06 male and 04 female) were interviewed and same numbers of records were reviewed for 03 sampled month

All workers said they were satisfied with their employment at the facility and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect.

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*

Not applicable

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and extended their cooperation during the process. All documentation requested for review was provided timely. At the end of the audit, all the non-compliances were accepted by the facility and they assured corrective action.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

- 1) Facility has documented social policies for each salient issue where human rights impacts are covered and communicated to all employees and suppliers.
- 2) The social policies are communicated throughout their supply chain including suppliers and sourcing agents.
- 3) Facility has measured their direct, indirect, and potential impacts on stakeholders i.e. suppliers (right holders) human rights through assessments/internal audits.
- 4) Facility has designated responsible person Mr. Kapil Kosode – Executive is responsible for implementing standards concerning Human rights.

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

##### Details:

- Business Ethics Policy and Procedures
- Interaction with management and employees
- Supplier and stakeholders Agreements

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Policy statement that expresses commitment to respect human rights was formed by the facility.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Kapil Kosode Job title: Executive
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility has provided following grievance mechanism for confidential reporting and anonymously without fear of retaliation any breaches of policies and procedures. 1. Open Door Policy
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has formed a Data privacy policy which ensures all employees, supplier and customer information remains confidential.

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



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

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: Not provided	A2: This year Not provided
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]	Not provided	
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: __ Not provided	C2: This year __ Not provided
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	Not provided	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: No accident happened till February 2022.	
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: Number: Not provided	F2: This year: Number: Not provided
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]	Not provided	
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: Not provided	H2: This year: Not provided
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers Not provided	I2: 12 months 0 % workers Not provided
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0 % workers Not provided	J2: 12 months 0 % workers Not provided

## 0B: Management system and Code Implementation

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Based on interaction with the facility management, it was understood that the facility management has communicated to all the employees about the ETI base code requirements.
2. Mr. Kapil Kosode – Executive is responsible for implementation of all the social compliance activities in the facility.
3. The facility has communicated the code to their suppliers and all its business associates.

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

##### Details:

- Facility Policy and Procedures
- ETI base code
- Interaction with Management and Interview with employees.

Any other comments: None

### Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

- ☐ Yes  
☒ No

A1: Please give details: Facility has not been subjected to any fines for non-compliance to any regulations in the last 12 months.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

- ☒ Yes  
☐ No

B1: Please give details: Facility has policy and procedure to reduce the risk of forced labour, Child labour, discrimination, harassment &

	abuse. These policies are displayed at notice board in local language.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	<p><b><u>Child labour:</u></b></p> <ul style="list-style-type: none"> <li>• Facility has displayed child labour prohibition policy in the premises.</li> <li>• It was noted through document review and facility tour that no child labour was found during audit process at the facility.</li> <li>• Facility had verified the age of the workers at the time of employment and used to collect the photocopy of age proof documents such as election identity cards, and marks sheet also noted.</li> <li>• During the workers interviews the employees confirmed that facility has not engaged child labour in any of the manufacturing process.</li> <li>• The age of the youngest worker as per personnel file reviewed is 35 years.</li> </ul> <p><b><u>Forced Labour:</u></b></p> <ul style="list-style-type: none"> <li>• It was noted during the audit process that the facility has not engaged any forced labour in the facility.</li> <li>• During the employee interviews it is confirmed that they can leave their employer after reasonable notice period.</li> <li>• It was noted through the documentation review and workers interview there was no evidence of forced, bonded or prison labour in the audit facility.</li> </ul> <p><b><u>Discrimination:</u></b></p> <ul style="list-style-type: none"> <li>• During the documentation review of employment, compensation, training, or promotion no evidence of discrimination was found and during the worker's interviews confirmed that they receive equal pay for equal work.</li> </ul> <p><b><u>Harassment &amp; abuse:</u></b></p> <ul style="list-style-type: none"> <li>• During the audit process, employee interview has been conducted in the place where the workers freely express their views, and the workers interview has conducted without presence of the management in both - Individual and</li> </ul>

	group, further It was noted while interacted with all workers during the worker's interview stated that they have not faced any harassment and Abuse.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Training records including interaction with management / employees shows and confirms that training given to all managers and workers was effective. - Introductory training record for new employees.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has provided ETI training to its employees and has maintained ETI training records of employees.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:N/A
G: Is there a Human Resources manager/department? If Yes, please detail.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: N/A
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Mr. Kapil Kosode – Executive is responsible for code implementation.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: There is a Data privacy policy to ensure all workers information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility had "Data Privacy policy" to ensure all worker information is confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has a system of conducting internal audit to evaluate the

	effectiveness of policy and procedures and update the same if required.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Facility has conducted risk assessment on health and safety part which addresses the issues and defines the remedial action plan to reduce the identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has policy which requires labour standards of suppliers.
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: Facility has acquired land on rent basis. However, It was noted during review of records that facility has not obtained shops & establishment license from concern authority.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: It was noted from management interaction that, facility have written policy and procedures specific to land rights.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: All the original purchase agreement hold rights papers were available with payment proof.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: Facility has written policy to check all legal aspects before grabbing any land. Facility has taken legal opinion before purchasing. All the original papers were available.



S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.

☐ Yes

☒ No

S1: Please give details: Not Applicable

### Non-compliance:

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

☒ NC against ETI/Additional Elements

☒ NC against Local Law

☐ NC against customer code:

It was noted during review of records that facility has not obtained shops & establishment license from concern authority.

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

According to Section 3 The Maharashtra Shops & Establishment Rules, 2018, Application for registration of establishment. The employer of every establishment engaging ten or more workers shall submit online application in Form 'A' for registration of the establishment as per section 6 of the Act along with the required documents as specified in Part A of the Schedule.

#### Recommended corrective action:

Facility shall ensure to obtain shops & establishment license from concern authority.

**Action By:** Mr. Kapil Kosode – Executive

**Time Scale:** 60 days

**Verification Method:** Desktop

#### Objective evidence observed:

(where relevant please add photo numbers)

Record review

### Observation:

#### Description of observation:

None Observed

#### Local law or ETI requirement:

Not Applicable

#### Comments:

Not Applicable

#### Objective evidence observed:

Not Applicable

### Good Examples observed:

Description of Good Example (GE): None observed

#### Objective evidence observed:

Not applicable

## 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:

Based on interaction with employee's, management, and review of records,

1. Employees are recruited through a personal interview. Employees are not required to lodge any deposits or identity papers with the facility before or after joining the services.
2. The facility does not require monetary deposit or deposition of employee's original ID card such as a condition of employment.
3. Employees are free to leave at the end of their shift and there is no compulsion to work overtime.
4. The facility does not restrict the employee's freedom of movement.

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

Details:

- Facility Policy and Procedures
- Interview with employees and tour of the facility did not show the evidence of prison labour in the facility.
- The facility has displayed overtime policy stating that over time work is voluntary. In case of need of overtime work, employees are asked and requested to work on voluntary basis except as required to meet urgent business needs.

Any other comments:

None .

A: Is there any evidence of retention of original documents, e.g. passports/ID's

- ☐ Yes  
☒ No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation

- ☐ Yes  
☒ No

B1: If yes, please give details and category of worker affected:

C: Is there any evidence of retention of wages /deposits

- ☐ Yes  
☒ No

	C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<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:
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: Employees are free to leave their workplace without any restriction at the end of work day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable H1: Please describe finding: Facility does not involve on any forced / trafficked labour.

Non-compliance:	
<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> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  Not Applicable

<b>Observation:</b>
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<b>Description of observation:</b> None Observed <b>Local law or ETI requirement:</b> Not Applicable <b>Comments:</b> Not Applicable	<b>Objective evidence observed:</b>  Not Applicable
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Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b> Not applicable

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

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

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

- Based from the review of company policies, interaction with facility management and employees and tour of the facility, it was noted that:
- Facility encourages and respects all employees' rights to join union freely.
- Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- The facility does not restrict employees on organizing trade unions and has an open approach to get
- Facility has open door policy where employees can share their concerns anonymously.

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

##### Details:

- Facility Policy and Procedures.
- Interaction with Management and Interview with employees.

Any other comments: None

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

D: Is there any other form of effective worker/management communication channel? <i>(Other than union/worker committee e.g. H&amp;S, sexual harassment)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has open door policy where employees are free to express their problems / suggestions / complaints for any grievances. D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – Not applicable	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not applicable	
F: Name of union and union representative, if applicable:	No union exists in the facility	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?	No works committee in the facility	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	I1: Date of last election: Not applicable
J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	
K: Were worker representatives/union representatives interviewed?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 0 - Not applicable	
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>	Not applicable	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: __0__% workers covered by Union CBA	M2: __0__% workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed  <b>Local law and/or ETI requirement:</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  Not Applicable

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

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b> Not applicable

### 3: Working Conditions are Safe and Hygienic

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

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

#### ETI

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

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

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

#### Current Systems and Evidence Examined

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

#### Current systems:

- Mr. Kapil Kosode – Executive is responsible for Health & Safety aspects for the site.
- Potable water was freely available in facility and test certificates was available on the day of audit. Last Test was conducted on 17.02.2022.
- Sufficient & clean toilets were always available for workers
- Ventilation, temperature, and lighting were adequate for the production processes
- Only fire safety equipment's such as 05 fire extinguishers & 02 Emergency lights were provided in the facility.
- Facility has provided well equipped 01 first aid box.
- Facility has carried out medical examination of all employees on dated 09.02.2022
- Facility does not use chemicals onsite.
- Facility had trained employee on first aid dated 9.02.2022 from Dhanwantary Multi-Speciality
- Facility has conducted firefighting dated 24-1-2022 from Rathi Engg & Fire Protection,
- Facility does not conduct mock drills.
- Facility has not obtained fire NOC
- Facility has not marked aisle anywhere
- Fire alarm has not installed fire alarm system

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

Details:

- Health and Safety Policy
- Drinking water test report 17.02.2022.
- List of fire safety equipment
- Interaction with Management and Interview with employees.

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: Facility had established general Health &amp; Safety, occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility had posted on notice board.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility had maintained the approved plant layout as per the current setup of the building from inspector of factories.</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: Yes. Facility has displayed the H&amp;S instructions on the notice board for the visitors and employees. Further facility also provides relevant personal protective equipment to the visitors before allowing them to enter the production area.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Legally not required</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: Facility had trained employee on first aid.</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: Facility does not provide transport facilities to the workers.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Not applicable</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: Facility has conducted risk assessment. Facility has also ensured that appropriate corrective and preventive actions are defined. Further the action date and responsible person is identified while performing the said assessment.</p>

J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: N/A as pollution consent order is legally not applicable to this facility.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility does not use any banned chemicals.

### Non-compliance:

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

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

It was noted during review of records that facility has not conducted evacuation drill.

#### ETI Requirement:

ETI Code 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

#### Recommended corrective action:

Facility shall conduct evacuation drill at regular intervals.

**Action By:** Mr. Kapil Kosode – Executive

**Time Scale:** 60 days

**Verification Method:** Desktop

#### Objective evidence observed:

(where relevant please add photo numbers)

Record review

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

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

It was noted during review of records that facility has not obtained fire NOC from concern authority.

#### ETI Requirement/ local law:

In accordance of Maharashtra Fire Prevention and Life Safety Measures Act, 2006 (3) The owner or occupier, as the case may be, shall furnish to the Chief Fire Officer or the nominated officer, a certificate in the prescribed form issued by a Licensed Agency regarding the compliance of the fire prevention and life safety measures in his such building or part thereof, as required by or under the provisions of this Act, and shall also furnish to the Chief Fire Officer or a nominated officer, a certificate in the prescribed form, twice a year in the months of January and July regarding the maintenance of fire prevention and life safety measures in good repair and efficient condition as specified in sub-section (1).

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,

#### Objective evidence observed:

(where relevant please add photo numbers)

Record review

<p>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> Facility shall obtain Fire NOC from concern authority.</p> <p><b>Action By:</b> Mr. Kapil Kosode – Executive <b>Time Scale:</b> 60 days <b>Verification Method:</b> Desktop</p>	
<p><b>3. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:  It was noted during site tour aisles were not marked in all the areas.</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>  Facility shall mark aisles in all the areas.</p> <p><b>Action By:</b> Mr. Kapil Kosode – Executive <b>Time Scale:</b> 60 days <b>Verification Method:</b> Desktop</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Site tour See Nc photo no-1</p>
<p><b>4. Description of non-compliance:</b>  <input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:  It was noted during site tour that fire alarm was not installed.</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>  Facility shall ensure to install fire alarm in all the areas.</p> <p><b>Action By:</b> Mr. Kapil Kosode – Executive <b>Time Scale:</b> 60 days</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Site tour</p>

<b>Verification Method:</b> Desktop	
<p><b>5. Description of non-compliance:</b></p> <p><input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>It was noted during site tour that loose wiring found at electrical panel and electrical board was placed on wooden plywood.</p> <p><b>ETI Requirement:</b></p> <p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b></p> <p>Facility shall ensure to provide insulation to all loose wiring &amp; electrical board shall be placed on non-flammable material.</p> <p><b>Action By:</b> Mr. Kapil Kosode – Executive  <b>Time Scale:</b> 60 days  <b>Verification Method:</b> Desktop</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>Site tour  See Nc photo no-2</p>

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

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

**4: Child Labour Shall Not Be Used**[\(Click here to return to summary of findings\)](#)[\(Click here to return to Key Information\)](#)**ETI**

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

**Current Systems and Evidence Examined**

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

**Current systems:**

1. Based from interaction with facility management, all employees are hired by the Human Resource Department only.
2. Based from review of hiring policy documents, employee's ID for age proof such as Aadhar card was checked by department prior to hiring. The employees without valid ID certificates are not being hired.
3. Based from the policy review, the minimum hiring age of the facility is 18 years old.
4. Based from employees' interview, any suspect of child labor can be reported to facility management.
5. Based on the employee interviews, review of facility's Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

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

- Child Labor and Child Labor Remediation Policy.
- Age Proof records of 10 out of 10 selected samples.
- Interaction with Management and Interview with employees.

Any other comments: None

A: Legal age of employment:	Legal minimum: 14 years completed
B: Age of youngest worker found:	20 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No

[\(Go to clause 3 – Health and Safety\)](#)

E1: If yes, give details Not applicable

### Non-compliance:

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

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

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

Not Applicable

#### Recommended corrective action:

Not Applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

### Observation:

#### Description of observation:

None Observed

#### Local law or ETI requirement:

Not Applicable

#### Comments:

Not Applicable

#### Objective evidence observed:

Not Applicable

### Good Examples observed:

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

None Observed

#### Objective evidence observed:

Not Applicable



## 5: Living Wages are Paid

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

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

### ETI

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Wages section could not be verified due to insufficient payroll records.
2. Based from employee's interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month to all company and contracted employees.
3. Based from employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
4. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
5. Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages.

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

##### Details:

- Facility Policy.
- List of Holidays.
- Minimum wage notification
- Interaction with management and Employees.

Any other comments: None

### Non-compliance:

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

☒ NC against ETI ☒ NC against Local Law

☐ NC against customer code:

Compliance status to wages & benefits section could not be verified due to facility has not maintained payroll records & In/Out time records of all the

#### Objective evidence observed:

(where relevant please add photo numbers)

employees for any of the month. Further it was noted that facility has maintained attendance register where P is marked for present & A is marked for absent and in the same register salary of the employees calculated and paid to the group leader in cash. Further group leader distributed salary to individual employees. However no acknowledgement obtained from individual employees.

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

According to Rule 26A of The Minimum Wages Central Rules, 1950: Preservation of registers: A register required to be maintained under rules 21(4), 25(2) and 26(1) and 5{the muster roll required to be maintained under rule 26(5)} shall be preserved for a period of three years after the date of last entry made therein.

According to Section 13A (1) of The Payment of Wages Act, 1936, Every employer shall maintain such register and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed.

(2) Every register and record required to be maintained under this section shall, for the purpose of this act, be preserved for a period of three years after the date of the last entry made therein.

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.

#### Recommended corrective action:

Facility shall ensure to maintain actual In/Out time records of all the employee to verify exact hours worked by each employee and paid thereof.

**Action By:** Mr. Kapil Kosode – Executive

**Time Scale:** 60 days

**Verification Method:** Follow up

Record review

#### Observation:

##### Description of observation:

None Observed

##### Local law or ETI requirement:

Not Applicable

##### Comments:

Not Applicable

##### Objective evidence observed:

Not Applicable

#### Good Examples observed:

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

None Observed

##### Objective evidence observed:

Not Applicable

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## Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day and 48 Hours per week	A1: Could not be verified	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day, 12 hours per week and 50 hours per quarter	B1: Could not be verified	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: The legal minimum wages applicable to the facility in Maharashtra for Zone 4 are as under: Unskilled - INR 6833 per month. The wages are applicable with the effect from January 01, 2022 to 31 <sup>st</sup> July 2022	C1: Could not be verified	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of the ordinary rates of wages for overtime work performed on Weekdays, rest days and declared holidays.	D1: Could not be verified	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### Wages analysis:

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

A: Were accurate records shown at the first request?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--

A1: If <b>No</b> , why not?	Insufficient payroll records		
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 employees were sampled for interview & same employees payroll records were verified.		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If Yes, please give details: The legal minimum wages applicable to the facility in Maharashtra for Zone 4 are as under: Unskilled - INR 6833 per month. The wages are applicable with the effect from January 01, 2022 to 31 <sup>st</sup> July 2022	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details: Not Applicable	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input type="checkbox"/> Above Could not be verified	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  Could not be verified	
F: Please indicate the breakdown of workforce per earnings:	F1: 0 % of workforce earning under minimum wage F2: 0 % of workforce earning minimum wage F3: _0_% of workforce earning above minimum wage  Could not be verified		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Not applicable <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>  Could not be verified		
H: What deductions are required by law e.g. social insurance? Please state all types:	Employees Provident Fund and Employees State Insurance.		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.  I2: Please list all deductions that	1. 2.  Please describe: Could not be verified  1. Nil 2. Nil

		have not been made.	Please describe: Not Applicable
J: Were appropriate records available to verify hours of work and wages?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input type="checkbox"/> No Could not be verified	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Could not be verified		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility does not have any defined living wage. The employees are being paid in accordance with the Government stipulated minimum wages.		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not Applicable		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Could not be verified		
O: Are workers paid in a timely manner in line with local law?	<input type="checkbox"/> Yes <input type="checkbox"/> No Could not be verified		
P: Is there evidence that equal rates are being paid for equal work:	<input type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Could not be verified		
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain: Could not be verified		

## 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:

1. There is no compulsion on overtime work. It is purely voluntary.
2. Facility has maintained manual register but only Absent / Present is marked, no in out timing is noted.
3. The employees work for 6 days a week in with in single shift.  
The normal working hours are as follows:  
General Shift: 10:00 am to 07:00 pm  
Lunch Break: One hour – 01:00 pm to 02:00 pm  
Weekly off: Sunday for staff and staggered for workers.

#### Working hours analysis as follows based on available records:

Could not be verified

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

Details:

- Facility Policy.
- Interaction with management and Employees.

Any other comments: None

### Non-compliance:

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

- ☒ NC against ETI
 ☒ NC against Local Law  
☐ NC against customer code:

Compliance status to working hours section could not be verified due to facility has not maintained payroll records & In/Out time records of all the employees for any of the month. Further it was noted that facility has maintained attendance register where P is marked for present & A is marked for absent.

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

According to Rule 26A of The Minimum Wages Central Rules, 1950: Preservation of registers: A register required to be maintained under rules 21(4), 25(2) and 26(1) and 5{the muster roll required to be maintained under rule 26(5)} shall be preserved for a period of three years after the date of last entry made therein.

According to Section 13A (1) of The Payment of Wages Act, 1936, Every employer shall maintain such register and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed.

(2) Every register and record required to be maintained under this section shall, for the purpose of this act, be preserved for a period of three years after the date of the last entry made therein.

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.

#### Recommended corrective action:

Facility shall ensure to maintain actual In/Out time records of all the employee to verify compliance towards working hours section.

**Action By:** Mr. Kapil Kosode – Executive

**Time Scale:** 60 days

**Verification Method:** Follow up

#### Objective evidence observed:

(where relevant please add photo numbers)

Record review

### Observation:



<b>Description of observation:</b> None Observed <b>Local law or ETI requirement:</b> Not Applicable <b>Comments:</b> Not Applicable	<b>Objective evidence observed:</b>  Not Applicable
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Good Examples observed:	
Description of Good Example (GE): None Observed	<b>Objective evidence observed:</b> Not Applicable

<b>Working hours' analysis</b> Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
<b>Systems &amp; Processes</b>					
A. What timekeeping systems are used: time card etc.	Describe: Facility has maintained manual register but only Absent / Present is marked, no In out timing is noted.				
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 type="checkbox"/> No Could not be verified – no appointment letter issued.	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:			
		Not Applicable			
E. Do any standard/contracted	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency			



working hours defined in contracts/employment agreements exceed 48 hours per week?		Please give details: Could not be verified
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 type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain: Could not be verified	F3: Is this allowed by local law? <input type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	Could not be verified	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input type="checkbox"/> No Could not be verified	G1: If yes, % of workers & frequency:
		Not Applicable
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:
		Facility has not obtained and waiver.
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Could not be verified	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input type="checkbox"/> No Could not be verified	
K: Approximate percentage of total workers on highest overtime hours:	___ Could not be verified ___%	

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> Based on employee interview it was noted that overtime hours are performed on voluntary basis.
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Could not be verified	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</i> Could not be verified
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i> Could not be verified
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<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	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	Not Applicable	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	Not Applicable.	
Q: Is there evidence that overtime hours are being used for extended	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

periods to make up for labour shortages or increased order volumes?	Q1: If yes, please give details: Facility had recruited adequate number of workers according to their order volumes and avoids working overtime hours beyond the legal requirement.
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input type="checkbox"/> No Could not be verified

## 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:

1. The facility has established an Anti-discrimination policy, which states that there shall not be any discrimination based on caste, creed, sex, religion, gender, colour, language, race, political affiliation, union membership etc.
2. The facility provides equal access to employment as well as equal pay for equal work.
3. Based through review of records and audit process that, there is no case of discrimination based on gender, race, religion etc. in hiring, compensation, access to training, promotion, termination or retirement.
4. The facility has assigned Mr. Kapil Kosode – Executive responsible for the investigation and disposal of any discrimination issues.

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

##### Details:

- Anti-discrimination policy
- Training records
- The hiring and termination procedure, leave application records
- Interaction with management & employees

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _55_ % A2: Female _45_ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	None
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details: Facility have a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.
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Professional Development	
A: What type of training and development are available for workers?	Training pertaining to develop their skill is provided.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details: Not Applicable
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Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None Observed  <b>Local law and/or ETI requirement:</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> Not Applicable

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

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

## 8: Regular Employment Is Provided

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

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

### ETI

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

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

### Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

## Current Systems and Evidence Examined

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

### Current systems:

1. The facility has established the policy and procedures for hiring.
2. The facility has hired all the employees working in the facility through direct recruitment.
3. The facility has not provided appointment letters to its employees.

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

Details:

- Facility Policy
- Interaction with management and Employees
- Hiring Policy

Any other comments: None

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input checked="" type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>Facility has not issued appointment letter to any of the employees.</p> <p><b>ETI requirement:</b></p> <p>ETI Code 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p> <p><b>Recommended corrective action:</b></p> <p>Facility shall ensure to issue appointment letter to all the employees.</p> <p><b>Action By:</b> Mr. Kapil Kosode – Executive</p> <p><b>Time Scale:</b> 60 days</p> <p><b>Verification Method:</b> Desktop</p>	<p><b>Objective evidence observed:</b></p> <p>Record review</p>

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

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p><b>Objective Evidence Observed:</b></p> <p>Not Applicable</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 type="checkbox"/> Terms &amp; Conditions presented</p> <p><input type="checkbox"/> Understood by workers</p> <p><input type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Could not be verified as facility has not issued appointment letter to any of the employees.</p>



B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected: Could not be verified	
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: Not Applicable	
D: If any checked, give details:	Not Applicable	

<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:	No migrant worker in this facility	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0  B2: Total number of (outside of local country) recruitment agencies used: 0	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable	C2: Observations: Not Applicable

<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: Not Applicable</p>
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## NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)	
<p><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></p>	
<p>A: Number of agencies used (average):</p>	<p>A1: Names if available:</p> <p>No agency workers hired by facility</p>

B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No No agency workers hired by facility, hence not applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No No agency workers hired by facility, hence not applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details: No agency workers hired by facility, hence not applicable
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details: No agency workers hired by facility, hence not applicable

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

### 8A: Sub-Contracting and Homeworking

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

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

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

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

*Note to auditor on homeworking:*

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

Based on the interaction with the facility management and employee's interview, it is noted that the facility had no sub-contracting. All process was done in-house. Facility is not using any home workers.

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

**If any processes are sub-contracted – please populate below boxes:** Not Applicable

Details:

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

### Non-compliance:

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None Observed

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

Not Applicable

#### Recommended corrective action:

Not Applicable

#### Objective evidence observed:

Not Applicable

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

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

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: Not Applicable
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details: Not Applicable
C: Number of sub-contractors/agents used:	Not applicable as no subcontractor used. All process is done in-house.
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: Not Applicable
E: What checks are in place to ensure no child labour is being used and work is safe?	Not applicable as no subcontractor used. All process is done in-house.

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details: Not applicable as no homeworkers used. All process is done in-house.

B: Number of homeworkers	B1: Male: Nil	B2: Female: Nil	Total: Nil
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents	C1: If through agents, number of agents:	
	Not Applicable	Not Applicable	
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	Not Applicable as no home working is done in facility.		
F: What processes are carried out by homeworkers?	Not Applicable as no home working is done in facility.		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not Applicable		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable		

### 9: No Harsh or Inhumane Treatment is Allowed

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

#### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has provided open door policy where employees are free to express their problems / suggestions / complaints for any grievances.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Employee interviews confirm they can freely express their view to management through open door policy.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	1. Open Door Policy- Direct communication during meeting
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details: Based on interaction with the employees there are no disputes or concerns regarding employee employer relationship and workplace attitude. If any disputes are found as per the procedure the disputes will be settled within a week period.
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details: Not Applicable

G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  G1: If no, please explain: Not Applicable
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  H1: If no, please give details: Not Applicable
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  I1: If yes, please give details: Not Applicable

### Current Systems and Evidence Examined

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

#### Current systems:

1. There is no evidence of harsh or inhumane treatment of employees.
2. All employees are treated with respect and dignity.
3. Facility's disciplinary policies are explained to all employees and all employees are aware about their rights.
4. No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.

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

##### Details:

- Disciplinary policies
- Training Records
- Interaction with the employees

Any other comments: None



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  None Observed  <b>Local law and/or ETI requirement:</b> Not Applicable  <b>Recommended corrective action:</b> Not Applicable	<b>Objective evidence observed:</b> Not Applicable

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

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

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

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

### Additional Elements

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. The facility has not engaged any immigrant employees in the facility.
2. Based on employee interview, management interaction and employee's interview, the facility have not employed any foreign nationals.
3. Based on the interaction with employees it was observed that (10 out of 10), all of them are holding the legal rights to work.

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

##### Details:

- Interaction with Management and Employees
- Recruitment policies/ Procedure.
- Age proof

Any other comments: None

### Non-compliance:

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

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

☐ NC against Local Law

None Observed

**Local law and/or ETI /Additional Elements requirement:** Not Applicable

**Recommended corrective action:** Not Applicable

#### Objective evidence observed:

Not Applicable

### Observation:

<b>Description of observation:</b> None Observed  <b>Local law or ETI/Additional Elements requirement:</b> Not Applicable  <b>Comments:</b> Not Applicable	<b>Objective evidence observed:</b>  Not Applicable
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Good examples observed:	
Description of Good Example (GE): None Observed	<b>Objective Evidence Observed:</b> Not Applicable

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

1. Mr. Kapil Kosode – Executive is responsible for all environmental issues.
2. Facility is aware of the legal environmental requirements.
3. Facility has not obtained air and water pollution consent as it is legally not applicable to them.
4. There are no hazardous process and high noise areas as per the nature of process activity carried out.

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

Details:

- Environment Policy.
- Training Records
- Interaction with management & employees.

Any other comments: None

### Non-compliance:

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

☐ NC against ETI/Additional Elements  
None observed

☐ NC against Local Law

#### Local law / ETI requirement:

Not applicable

#### Recommended corrective action:

Not applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

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

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

Other Findings Outside the Scope of the Code
Not Observed

<b>Community Benefits</b> <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>
Not Observed

## Appendix 1

<p><b>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."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>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.</p> <p>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>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.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	



<p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>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.</p>	
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>
<p>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.</p>	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>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.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p><b>B.4. Compliance Requirements</b></p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>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>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>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).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

### 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.

## Photo Form







### Non- compliance photographs

		
1. Aisles not marked	2. Electrical board placed on wooden board	

### Observation photographs

None observed

### General Photographs

		
1. Overall view of the facility	2. Name Board	3. Name Board
		
4. Sorting & Packing Area	5. Hygiene station	6. Fire Extinguisher



		
<p>7. Evacuation Plan</p>	<p>8. First Aid Box</p>	<p>9. Marked Exit</p>
		
<p>10. Suggestion Box</p>	<p>11. Clean Urinals</p>	<p>12. Drinking Water</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:

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