




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 405854965	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 405942792	
Business name (Company name):	Debonair Padding and Quilting Solution Ltd			
Site name:	Debonair Padding and Quilting Solution Ltd			
Site address: <i>(Please include full address)</i>	Chotanpara, Paragaon, 10 No Hobirbari, PO-2240, Valuka, Mymensingh.	Country:	Bangladesh	
Site contact and job title:	S.M Shafiqul Islam (Assistant General Manager- HR & Compliance)			
Site phone:	8801709650621	Site e-mail:	mhrc.dpqsl@debonairgroupbd.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	January 05 & 06, 2022			

<b>Audit Company Name &amp; Logo:</b> <b>ALGI Bangladesh (Pvt.) Ltd.</b>  Building a Sustainable Ethical Culture	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i> <b>Debonair Padding and Quilting Solution 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):

Lead auditor: Shah Md. Nazmul APSCA Registration Number: RA 21700949  
Team Auditor: Towhidur Rahman APSCA Registration Number: RA 21700958  
Internal Trainee: Abdur Rahman APSCA Registration Number: ASCA 21705439  
Interviewers: Shah Md. Nazmul Hoque, Towhidur Rahman, and Md. Abdur Rahman.

Report writer: Shah Md. Nazmul Hoque

Report reviewer: Shakil Ahmed

Date of declaration: January 06, 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"/>				• None
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• None
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• None
3. <a href="#">Safety and Hygienic Conditions</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02	00	00	<b>NCs:</b> <ul style="list-style-type: none"> <li>According to the documents review and management interview, it was noted that the auditee is using 03 diesel generators with the capacity of 1.85 MW without having permission from the concerned authority. Although the auditee initially applied to the concerned authority on October 16, 2018, and 2nd reminder application was submitted on June 01, 2021, but due to the delay process of Govt. authority, they did not obtain permission yet.</li> </ul>

									<ul style="list-style-type: none"> <li>According to the facility visit, it was noted that 07 out of 07 hand-stitching workers was not using finger guard/hand gloves while working on the production floor. As per the risk assessment, all workers involved with hand-stitching shall use finger guard/hand gloves.</li> </ul>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	03	<b>GEs:</b> <ul style="list-style-type: none"> <li>The factory provides attendance bonus to the workers.</li> <li>25% discount on product value of canteen.</li> <li>Best performer award system in every month.</li> </ul>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	N/A



10B4	Environment 4-Pillar		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	00	03	<p><b>NCs:</b></p> <ul style="list-style-type: none"> <li>According to the facility visit, it was noted that the sludges from effluent treatment plant (ETP) were kept in open space which may cause contamination after coming contact with rainwater.</li> </ul> <p><b>GEs:</b></p> <ul style="list-style-type: none"> <li>Installed solar panel.</li> <li>Installed energy savings lights throughout the facility.</li> <li>Initiated plantation program.</li> </ul>
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> <li>None</li> </ul>

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

#### Assessment Time Frame & Scope:

This periodic audit (semi-announced) that started at 8:15 am on January 5, 2022 and ended at 5.00 pm on January 6, 2022. ALGI team of auditors; Shah Md. Nazmul Hoque-Lead Auditor (APSCA registration No.– RA 217009949), Towhidur Rahman (APSCA Registration Number – RA 21700958) and, Md. Abdur Rahman - Internal Trainee Auditor (APSCA Registration No. – ASCA 21705439), were assigned for 02 days (03 auditors on 1st day and 02 auditors on 2nd day) to verify the overall compliance status of the factory against ETI code of conduct (SMETA Best Practice Guideline 6.1) as well as applicable local laws relating to the following areas:

- Management systems and code implementation
- Freely chosen Employment.
- Freedom of Association
- Safety and Hygienic Conditions
- Child Labour
- Living Wages and Benefits
- Working Hours
- Discrimination
- Regular Employment
- Subcontracting and Homeworking
- Harsh or Inhumane Treatment

- Entitlement to Work
- Environment 4–Pillar
- Business Ethics

The audit components included opening and on-going discussions with management regarding factory practices, a review of documentation and records, a facility tour, confidential employee interviews and a final closing meeting with management.

#### Factory Overview:

The factory "Debonair Padding and Quilting Solution Ltd" is a Private Limited Company. The factory is located at Chotanpara, Paragaon, 10 No Hobirbari, PO-2240, Valuka, Mymensingh, Bangladesh. The factory was incorporated as a private limited company in the year of 2015 under the Companies Act (Act VIII) of 1994 and started its operation in 2017. The main product manufactured by the factory are jackets. The facility is specialized in manufacturing of homeware and padding for the jacket. Main production processes include Padding: Hand mixture, bale opener, Super mixture, fiber distribution, carding, cross lapper, drafter, resin spray one & two, dryer box/heating chamber, calendaring, air cooling, metal detector, finishing, winding & vacuum packing. Homeware: cutting, zipper joining, level joining, overlock, finishing, iron & packing.

The factory does not have any dormitory facility for the workers. A total of 1,346 employees are currently working in the factory, which includes 1,047 production workers and 299 management & staff. All the workers are local, and no migrant workers are employed. Workers' annual turnover rate is 3.92%.

As per company policy, wages are calculated monthly and are paid generally within 7 working days of the following month. Currently general shift (cutting, sewing, finishing, padding & comforter) runs in 01 shift from 08:00 am to 05:00 pm, Needle punch runs in 2 shifts from 8.00 am to 5.00 pm and 8.00 pm to 5.00 am & Quilting, Padding, Comforter, eco down & security section runs in 03 shifts from 06:00 am to 02:00 pm, 02:00 pm to 10:00 pm & 10:00 pm to 06:00 am. Sixty minutes are assigned for resting break for all.

There was no organized labor union established in the facility. The facility has established a Participation Committee (PC) comprising of 12 members (Management - 05 & Worker - 09) and the last meeting was conducted on January 02, 2022.

#### Opening Meeting:

S.M Shafiqul Islam, AGM (HR & Compliance) along with the other factory compliance personnel attended the opening meeting. ALGI staff provided a brief description of the audit process, scope, and required documentation as well as explained the client expectation on transparency, and also provided ALGI Gift and Gratuity letter for review and signature. The management seemed open to the audit and claimed that they would provide all the necessary documentation as requested.

#### Document & Record Review:

Wages & Benefits (Based on provided records): 11 months' timekeeping records and wages list was asked from January'21 to November'21 and reviewed in detail for the months of November'2021 (current month), July'2021 (random month) and February'2021 (random month). As per provided records, the



factory pays the regular wages within 7 working days of the following month. The factory has ensured the country's current minimum wages BDT8000 per month. Pay slips are given to all workers prior to the wage disbursement.

Other:

A variety of documents and records such as employee personnel files, contracts, age verification documentation, factory's business license, factory rules; machine operator certificates, fire safety permits etc. were provided and reviewed. The factory had all valid business licenses to operate the factory. The factory has policies on different issues like child labor, forced labor, working hour, discrimination, harassment, and abuse etc. The factory has formal grievance handling procedure existing in the factory. Complaint boxes were provided in the toilets and workers were found aware of their legal rights & duties.

Health & Safety Tour:

All areas and floors of this factory were toured including production floors, childcare room, & utility areas. The H&S condition of this factory is satisfactory. The production floor was found clean. Pure drinking water was provided for the workers. Factory production floor was well ventilated. First aid boxes were provided on the floor with necessary medicine. The evacuation plan was posted in all exit points in the local language. All electrical panel boards were found clean & with proper insulation. Fire alarm bell, fire alarm switch, visual fire alarm, smoke detector was available with power back up in all workplaces including utility areas.

Workers Interview:

A total of 52 (19 female and 33 male) workers were interviewed from various sections. 20 were interviewed individually & 32 were interviewed in 8 groups of 4 workers. The interviews were conducted in an unused inspection room.

Closing Meeting:

S.M Shafiqul Islam, AGM (HR & Compliance) along with the factory compliance team and a representative from the Participation Committee (PC) attended the closing meeting. ALGI team communicated each finding in detail and allowed them to ask questions and provide any needed clarifications. They agreed on all the issues and signed the CAPR and confirmed their understanding of each finding discussed. The ALGI team handed over a copy of the draft findings to the factory and thanked them for their cooperation and left the factory in 05:00 pm on January 6, 2022.

*\*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:	Debonair Padding and Quilting Solution Ltd.																																																																
B: Site name:	Debonair Padding and Quilting Solution Ltd.																																																																
C: GPS location: (If available)	GPS Address:	Latitude: 23.826330 Longitude: 89.267727																																																															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<b>Factory License No:</b> 1356/Mymensingh, Valid up to 30th June 2022. <b>Trade License No:</b> 19, Valid up to 30th June 2022. <b>Fire license No:</b> DD/MYMN/108/20-21, Valid up to 30th June 2022.																																																																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	<b>Homeware and padding for jacket</b>																																																																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The factory "Debonair Padding and Quilting Solution Ltd" is a Private Limited Company. The factory is located at Chotanpara, Paragaon, 10 No Hobirbari, PO-2240, Valuka, Mymensingh, Bangladesh. The total land area occupied by the facility is 52 Bigha, where the built-up area is about 3,10,628 square feet (as per fire license).</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td colspan="3"><b>RCC Building 01: (03 storied)</b></td> </tr> <tr> <td><b>Ground floor</b></td> <td>Raw material.</td> <td>None</td> </tr> <tr> <td><b>1st floor</b></td> <td>Homeware Finished goods.</td> <td>None</td> </tr> <tr> <td><b>2nd floor</b></td> <td>Homeware Finished goods.</td> <td>None</td> </tr> <tr> <td><b>Roof Top</b></td> <td>100% Open</td> <td>None</td> </tr> <tr> <td><b>Building 02</b></td> <td>Office, Medical, Childcare room.</td> <td>None</td> </tr> <tr> <td><b>Building 03</b></td> <td>Security Office.</td> <td>None</td> </tr> <tr> <td><b>RMS Building 04</b></td> <td>Security Changing Room Area</td> <td>None</td> </tr> <tr> <td><b>Building 05</b></td> <td>Substation control room.</td> <td>None</td> </tr> <tr> <td><b>Building 06</b></td> <td>Fire control room.</td> <td>None</td> </tr> <tr> <td><b>Building 07</b></td> <td>ETP Lab room.</td> <td>None</td> </tr> <tr> <td><b>Building 08</b></td> <td>Quilting toilet.</td> <td>None</td> </tr> <tr> <td><b>Building 09</b></td> <td>Padding toilet.</td> <td>None</td> </tr> <tr> <td><b>Building 10</b></td> <td>Canteen</td> <td>None</td> </tr> <tr> <td colspan="3"><b>Sheds</b></td> </tr> <tr> <td><b>Shed 01</b></td> <td>PSF warehouse.</td> <td>None</td> </tr> <tr> <td><b>Shed 02</b></td> <td>Padding production</td> <td>None</td> </tr> <tr> <td><b>Shed 03</b></td> <td>Comforter.</td> <td>None</td> </tr> <tr> <td><b>Shed 04</b></td> <td>Home ware</td> <td>None</td> </tr> <tr> <td><b>Shed 05</b></td> <td>Pillow filling.</td> <td>None</td> </tr> </tbody> </table>		Production Building no	Description	Remark, if any	<b>RCC Building 01: (03 storied)</b>			<b>Ground floor</b>	Raw material.	None	<b>1st floor</b>	Homeware Finished goods.	None	<b>2nd floor</b>	Homeware Finished goods.	None	<b>Roof Top</b>	100% Open	None	<b>Building 02</b>	Office, Medical, Childcare room.	None	<b>Building 03</b>	Security Office.	None	<b>RMS Building 04</b>	Security Changing Room Area	None	<b>Building 05</b>	Substation control room.	None	<b>Building 06</b>	Fire control room.	None	<b>Building 07</b>	ETP Lab room.	None	<b>Building 08</b>	Quilting toilet.	None	<b>Building 09</b>	Padding toilet.	None	<b>Building 10</b>	Canteen	None	<b>Sheds</b>			<b>Shed 01</b>	PSF warehouse.	None	<b>Shed 02</b>	Padding production	None	<b>Shed 03</b>	Comforter.	None	<b>Shed 04</b>	Home ware	None	<b>Shed 05</b>	Pillow filling.	None
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	<b>Shed 06</b>	Utility.	None
	<b>Shed 07</b>	Needle punch.	None
	<b>Shed 08</b>	Quilting.	None
	<b>Shed 09</b>	Glue Lamination & Fake down	None
	<b>Shed 10</b>	Resin.	None
	<b>Shed 11</b>	Gas bank.	None
	<b>Shed 12</b>	ETP.	None
	<b>Shed 13</b>	Cocking Area	None
	<b>Shed 14</b>	Resin Mixing1	None
	<b>Shed 15</b>	Resin Mixing2	None
	<b>Shed 16</b>	Gas riser	None
	<b>Shed 17</b>	Waste Storage Area	None
	<b>Shed 18</b>	Quilting Extension Shed	None
	<b>Shed 19</b>	Boiler	None
	<b>Shed 20</b>	33 KV Sub-Station Electric Control Area	None
	<b>Radio tower.</b>		None
	Is this a shared building?	No	None
	<p>F1: Visible structural integrity issues (large cracks) observed?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>F2: Please give details:</p> <p>No such crack was observed during audit in the whole facility premises.</p> <p>F3: Does the site have a structural engineer evaluation?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>F4: Please give details:</p> <p>Structural engineer evaluation has conducted by a firm named "ELEVATE".</p>		
	G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor	
	H: Month(s) of peak season: (if applicable)	There is no obvious peak season. The level of production is same round the year.	
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p><b>Product Type:</b> Homeware and padding for jacket</p> <p><b>Main products manufactured by the factory:</b> Padding: Hand mixture, bale opener, Super mixture, fiber distribution, carding, cross lapper, drafter, resin spray one &amp; two, dryer box/heating chamber, calendaring, air cooling, metal detector, finishing,</p>		

winding & vacuum packing. Homeware: cutting, zipper joining, level joining, overlock, finishing, iron & packing.

**Facility's production capacity:**

- Padding- 1,625,000 Yard per month.
- Eco Down- 300,000 Kg per month.
- Needle punch- 5,50,000 sqm per month
- Geo Bag- 2,50,000 Pieces per month
- Ball Fibre- 25,000 Kg per month.
- Quilting – 5,625,000 Yard per month
- Home ware – 550,000 Pieces per month
- Backpack – 13,000 Pieces per month

**Machinery List**  
**of**  
**Debonair Padding and Quilting Solution Ltd**

SL NO	Machines Name	QTY
1	Snap button Mc.	6
2	Fabric Inspection mc.	1
3	Side Pannel Cutting Mc.	2
4	Hand Cutting Mc.	4
5	Cusion Etriching Mc.	2
6	Pillow Filling M/C	2
7	Pillow Rolling M/C	6
8	Vacume Packing Machine	2
9	Metal Detector Mc.	3
10	Over Look	46
11	Plane Machine	344
12	Iron	73
13	Packing Compresure	2
14	Havy Fit Mc.	1
15	Needle Detector Mc. (Hand)	1
16	Pull Test Machine	1
17	Light Box Set	1
18	Button Stitch	3
19	Fad Lock	1
20	Plane Machine.Ruler	1
21	Weigh Machine	4
22	Label cutting Machine	2
23	Threat Cutter Machine	1
24	Grinding Machine	2
25	Sewing Cutter/S cutter	1
26	High Post/Binding Machine	1
27	Bar Tack	11
28	Vartical Machine	2
29	Rib Cutting Machine	1
30	Sealing M/C	1

	31	Sucker M/C	1
	32	Hole machine	4
	33	Two Neddle ( Regular)	19
	34	padding Mc.	2
	35	Vacuum Padding Paking Mc.	2
	36	Fakedown Mc.	3
	37	Ball faiber	1
	38	Metal Detector	2
	39	Needle Punch	1
	40	Plane Machine	162
	41	Cycle Machine	4
	42	2 Needle Machine	4
	43	Bar Tag Machine	4
	44	High Post/Binding Machine	1
	45	Over Lock Machine	2
	46	Vertical Quilting machine	2
	47	Vertical Quilting machine	10
	48	Vertical Quilting machine	5
	49	Vertical Quilting machine	2
	50	Vertical Quilting machine	3
	51	Vertical Quilting machine	2
	52	Horizontal Quilting machine	4
	53	EMB Quilting machine	2
	54	Ultrasonic Quilting Machine	1
	55	Ultrasonic Quilting Machine	1
	56	Quilting bobbin machine	1
	57	Quilting bobbin machine	9
	58	Comforter machine	2
	59	Comforter machine	1
	60	Comforter machine	4
	61	Plan machine	9
	62	Overlock machine	1
	63	Fabric rolling machine	4
	64	Quilting rolling machine	3
	Total		806
	<p style="text-align: center;"><b><u>Chemical List</u></b>  <b><u>of</u></b>  <b><u>Debonair Padding and Quilting Solution Ltd</u></b></p>		
	SL NO	Chemical Name	Place of use
	1	ACRYLIC HARD RESIN SH 306	Padding floor
	2	ACRYLIC SOFT RESIN SS 853	Padding floor

	3	Spot Lifter 833	Spot Removing Room
	4	Sodium Hydroxide (NaOH).Caustic Soda	ETP Plant
	5	Poly Aluminum Chloride	ETP Plant
	6	Polymer	ETP Plant
	7	Anti-Foam	ETP Plant
	8	Lamination Adhesive	Glue Lamination Floor
	9	Diesel	Generator
	10	Mobile	Utility & Maintenance
	11	Machine Oil	Maintenance
	12	WD-40	Utility & Maintenance
	13	Hand wash	All factory
	14	Liquid Toilet Cleaner	Toilet
	15		bowl Cleaner
	16	Glass Cleaner	All factory
	17	Detergent Powder	Wash Room
	18	Compressor Oil	Utility & Maintenance
	19	Coolant antifreeze liquate	Diesel Generator
	20	Sodium Chloride	Boiler
	21	/Salt	
	22	Grease	Utility & Maintenance
	23	Thinner	Maintenance
	24	Gum	Factory
	25	Hand sanitizer	Factory
	26	Bleaching Powder	Factory



J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
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 checked="" type="checkbox"/> No N1: If no, please give details The factory did not provide off-site accommodation building for the workers.

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08:15 am Day 1 Time out: 05:00 pm	Day 2 Time in: 08:30 am Day 2 Time out: 05:00 pm	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	3 auditors 1 <sup>st</sup> day and 2 auditors 2 <sup>nd</sup> day		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 04 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)	S.M Shafiqul Islam (Assistant General Manager- HR & Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	January 10 & 11, 2021		
J: Previous audit type:	Full Initial		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

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

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not Applicable		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Not Applicable, as there was no trade union in the factory.		

## 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	943	00	00	00	00	00	00	943
Worker numbers – female	403	00	00	00	00	00	00	403
Total	1346	00	00	00	00	00	00	1346
Number of Workers interviewed – male	33	00	00	00	00	00	00	33
Number of Workers interviewed – female	19	00	00	00	00	00	00	19
Total – interviewed sample size	52	00	00	00	00	00	00	52



A: Nationality of Management	Bangladeshi	
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: Bangladeshi 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: 100% Bangladeshi C1: approx % total workforce: Nationality 2 : _____ C2: approx % total workforce: Nationality 3 : _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: _____% hourly paid workers D2: 100% salaried workers  Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: 100% monthly paid D6: _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (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)	32 (8 group of 4 workers) During the interview session a social distancing among the workers was maintained as per the national guidelines for overcoming the pandemic situation.	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 12	D2: Female: 08
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<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?	Interviewed workers does not have any common complaint	
I: What did the workers like the most about working at this site?	As per the workers interview, the behaviour of the management as well as the working environment was good. They got monthly payment on time, attendance bonus, more than minimum wages, festival bonus and paid leave whenever they needed.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Positive	
L. Is there any worker survey information available?		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		



L1: If yes, please give details: The factory management has completed a grievance survey of all workers.

M: Attitude of workers:

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

52 employees were selected for interview including 33 male and 19 female employees, they were interviewed as 8 groups of 4 some mixed groups and some single and the balance of 20 employees were interviewed individually. The employees were assured of confidentiality, and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory, and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They can complain directly to their supervisors or line manager and felt free to give their general concerns to their participation committee representative who would take it to the committee.

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*

Participation Committee members interview was conducted privately in a separate place. The worker participation Committee members replied regarding their responsibilities as participation committee members and they also informed that they can easily carryout their daily job without any difficulties. Participation committee meetings are held on regular basis (Last held on January 02, 2020). They also stated that they could give suggestions on all parts of the site's practices.

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 during the whole audit process. S.M Shafiqul Islam, AGM (HR & Compliance) along with his team was present though the audit process and co-operated the whole audit. Facility management respect client's requirement and allow auditor to take photographs of all production process, best practices, and non-conformities. They also provide required documents photocopy and allow auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions. The factory management had a system in place to check their current practices against local law and have a Health & Safety committee to take care of health and safety concerns.

## 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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Policy and procedure
- List of responsible persons for ensuring this code implementation
- Training Records
- Notice board
- Meeting Minutes

##### Description of Current Status:

- The factory implements and maintains systems for delivering compliance to this Code.
- The factory has appointed a senior management representative to implement ETI Base Code and additional elements as SMETA Best Practice Guidelines.
- The factory management has identified their direct or indirect stakeholders as well as has measured the adverse impact of those stakeholder's human rights.
- The factory has an effective grievance handling system.

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

Details: HR policy, Recruitment policy, Minimum wage policy, working hour policy, Health & safety policy, Office order of responsible person monitoring human rights, Declaration on Human Rights commitment, Grievance mechanism etc.

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: According to recruitment policy, minimum wage policy, working hour policy and health & safety policy and the commitment on Human Rights, the facility is committed to comply all rules and regulations required by National Constitution and International regulations on human rights.
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: S.M Shafiqul Islam. Job title: Assistant General Manager- HR & Compliance.
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has developed a details policy and procedures on business ethics and confidentially reporting which refers all business activities will be on transparent system, keep all information confidential and ensure human rights on dealing those reporting among the employees.
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: The facility management keep individual workers information by internal software which is kept 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>Comments:</b> Not Applicable		<b>Objective evidence observed:</b>  Not Applicable

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

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: 605 Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2021: 3.92 %	A2: This year: 2022: 0 %
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]	3.92%	
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: 2021: 1.99 %	C2: This year: 2022: 0 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1.98%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: The auditee is maintaining accidents record register where keeps all major & minor injuries with the investigation record. As per injury register, minor types of needles and cut injuries occurred in the premises.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2021 Number: 13%	F2: This year: 2022 Number: 0%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.084%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2021 0%	H2: This year: 2022 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 90% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers
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### 0B: Management system and Code Implementation

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

##### Documents checked & comments:

- Legal licenses and business permission
- Management interview
- Worker interview
- Policy and procedure
- List of responsible persons for ensuring this code implementation
- Training Records
- Notice board
- Meeting Minutes

##### Description of Current Status:

- The factory implements and maintains systems for delivering compliance to this Code.
- Through the document review and management interview that S.M Shafiqul Islam (Assistant General Manager- HR & Compliance) is responsible for compliance with the Code.
- All business licenses were verified and found up to date.
- The facility has communicated this code with all their suppliers.
- Training sessions were effective on ETI Base Code and workers were aware of social and ethical standard.

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

**Details:** Training on Code of Conduct, Responsibility paper of Sr. Management representative, Monitoring system of suppliers  
Any other comments: None

### Management Systems:



<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  A1: Please give details:  The factory is not subjected any fines in last one year.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  B1: Please give details:  The facility has developed a forced labour policy. However, no records were found of forced labour, child labour, discrimination, harassment &amp; abuse in the facility. The human resource department is conducting regular internal audit to identify any risk regarding the mentioned issues.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Regular meeting minutes and awareness training record. Last training conducted on December 19, 2021.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: Please give details:  Training documents. Human resource department is responsible to conduct those training periodically.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details:  Training plan and related training documents reviewed, management &amp; workers interview.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits).  Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  F1: Please give details:  The facility is ISO 9000:2015(Certificate number: AJAEU/20/16124) and ISO 14001:2015 (Certificate number: AJAEU/20/16125) certified and both certificates are valid till April 24, 2023.</p>
<p>G: Is there a Human Resources manager/department?  If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  G1: Please give details:  Facility has a human resource department which is responsible for monitoring and implementing local regulation and client's requirements and employee's recruitment.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  H1: Please give details:</p>

	S.M Shafiqul Islam, AGM (HR & Compliance) is responsible person for implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The factory has developed business ethics and confidentiality policy to keep all information regarding business and employees.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility management keep individual workers information by their internal software system which is kept 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: S.M Shafiqul Islam, AGM (HR & Compliance) assesses the risk periodically to evaluate the effectiveness of business ethics and confidentiality policy & procedure.
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: The factory has a process to conduct regular internal audit including risk assessment.
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: There is an own Code of Conduct of the facility which requires labour standards of its own suppliers.
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The owner of the facility had bought this land and build up production Building & Shed by following all legal procedures.
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: The facility has own legal consultant team who are responsible to ensure all legal due diligence to recognize and apply national laws and practices relating to land title. As per records,

	the facility has obtained permission for using land relating to land title from the concerned authority. Building approval has taken from concerned authority as an industrial complex.
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility has written policy on land rights; however, it is not included any due diligence the company will undertake to obtain free, prior and informed consent</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility has bought their land from local authority.</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: The building owner obtained permission from the concerned authority as industrial use. However, they have written land use and acquisition policy to avoid or minimize adverse impacts.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: There is no evidence of illegal appropriation of land use. The building owner has obtained land uses permission from the concerned authority as per land title.</p>

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI requirement:</b> Not Applicable</p> <p><b>Recommended corrective action:</b> Not Applicable</p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p> <p>Not Applicable</p>

Observation:	
<b>Description of observation:</b> Not Applicable  <b>Local law or ETI 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

## 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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Local and national law
- Personal files
- Appointment letters
- ID card issue register
- Complaint register
- Policies

##### Description of Current Status:

- The factory does not require to deposit or withhold employees' ID cards.
- Workers are free to leave after shift ends.
- The factory does not limit the employees' freedom.

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

Details: Policy and statement of forced, bonded and involuntary prison labour. Procedures or system in place to ensure there is no forced, bonded or involuntary prison labour are being used. Recruitment procedures: Fair and non-precarious employment, no lodge or deposit required.

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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: As per workers interview and documents review there was no restriction on workers freedom to terminate employment.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable E1: Please describe finding: The factory has UK based business, but turnover is lower than USD36m.
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: There were no such practices noticed during the audit.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility understands the risks of forced/trafficked/ bonded labour in its supply chain and there is an internal supplier monitoring system in place. However, no forced/trafficked/ bonded labour has been identified through internal audit.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The factory has developed a "Forced Labor" policy and provides training to the mid-level management on regular basis.

Non-compliance:	
<b>1. Description of non-compliance:</b>  None Observed  <input type="checkbox"/> NC against ETI code: <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer  <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:
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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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Local and national law
- Meeting register
- Meeting minutes
- Formation of participation committee
- Posted pictures of participation committee's representatives
- Policies

##### Description of Current Status:

- The auditee has formed a participation committee through a free election process.
- Workers are aware of the participation committee activities.
- The facility management has developed a "Freedom of association" policy and as per policy workers can join any union.
- Workers are free to form the association as per law and are free to bargain.
- Worker's representatives are aware of their duties and activities.

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

Details: FOA policy, Formation of worker committee, Training records, meeting minutes etc.

Any other comments: None

A: What form of worker representation/union is there on site?

- ☐ Union (name)
- ☒ Worker Committee
- ☐ Other (specify)
- ☐ None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Health & Safety Committee, Grievance Handling Committee, and Canteen Committee.  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Worker representatives were elected by the workers freely. PC Committee Election conducted on 06 May 2021.	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has established a well-formed Freedom of Association Policy in place to ensure workers freedom of speech, organize and bargain collectively. As per the policy and statement, any worker can join trade union or form worker's committee. There are no restrictions to form or associate any committee in place.	
F: Name of union and union representative, if applicable:	Not Applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation Committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: The last election: May 06, 2021.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 01	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Register of meeting minutes and corrective actions and workers' interview. Meeting is conducted on January 02, 2022, and the topics of meeting were about how to create a good relation between the workers and the owner as well as committee's functionality.	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA N/A	M2: ____% workers covered by worker rep CBA N/A
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance:	
<b>1. Description of non-compliance:</b> None Observed  <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <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

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#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

##### Documents checked & comments:

- Management interview
- Worker interview
- Business operating licenses, certificates, and test reports
- Local and national law
- Training records
- Fire drill record
- Accident & injury records
- Policies

##### Description of Current Status:

- The factory posted the evacuation plans on work floors.
- Drinkable water was available in workshops.
- The facility conduct fire drill on regular basis and adequate numbers of fire equipment were found on floors.
- Production floors and worker's toilets were found clean in the production area.
- Worker's dining hall was found available for the workers to have their lunch.
- There were 47 first-aid boxes in the workplace in different sections.
- Fire safety was found as per requirements. Noted that the facility has installed addressable fire detection and protection system which is controlled through the central fire control panel. also, the fire hydrant system was found active, and the water pressure of the hose pipe was as per law requirement.
- There were found 812 fire extinguishers, 45 fire galleries, 57 fire hydrants, 286 smoke detectors, 71 fire alarm call points, 146 fire alarm bells, 122 exit signs, 128 emergency lights, 10 vesda panels, 29 PA systems, etc
- All aisles were found properly marked and blockage-free.
- Machine safety was found as per requirements
- The auditee has provided an anti-fatigue mat for long-time standing workers.

- The auditee is using 03 diesel generators with a capacity of 1.85 MW without having permission from the concerned authority. Although the auditee was submitted an application on June 01, 2021, due to the delayed process of Govt. authority, they did not obtain permission yet.
- Total 07 out of 07 hand-stitching workers were not using finger guard/hand gloves while working on the production floor. As per the risk assessment, all workers involved with hand-stitching shall use finger guards/hand gloves.

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

Details: H&S policy, Formation of H&S committee, Risk assessment, Accident & injury register & Training records, machine safety records & maintenance records, Fire drill record, Fire equipment and electric equipment checking record, Drinking water test report, H&S tour etc.

Any other comments: None.

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has developed General Health & Safety and Occupational Health & Safety policies and procedures.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility provides handbook to newly recruited workers where the policies are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There was no such structural addition in the premises. Floor layout as same as approved layout plan from concern authority.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Shortened safety instruction is written in factory main gate as well as visitors were given relevant personal protective equipment before getting entry of the place.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Medical room is well equipped as per legal requirements.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: There are one Medical Officer and one Nurse in the facility.

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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The factory does not have any transport facility for workers.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: There is no personal storage space facility for workers in the factory.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: As per management interview, the factory has assessed the risk related to production process, machines and vulnerable workers.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The factory has environmental procedure, Wastage disposal policy and a deed with concern department for wastage disposal.
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: The facility management maintain chemical inventory list to avoid banned chemicals as well as procurement department is highly trained on regarding this issue.

### Non-compliance:

#### Carried Over:

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

According to the documents review and management interview, it was noted that the auditee is using 03 diesel generators with the capacity of 1.85 MW without having permission from the concerned authority. Although the auditee initially applied to the concerned authority on October 16, 2018, and 2nd reminder application was submitted on June 01, 2021, but due to the delay process of Govt. authority, they did not obtain permission yet.

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

#### Local law and/or ETI requirement

#### As per Bangladesh Energy Regulatory Commission Act, 2003, section-27 1:

Licence—

(1) No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as:-

(a) power generation; (b) energy transmission; (c) energy distribution and marketing;  
(d) energy supply; and (e) energy storage.

#### Objective evidence observed:

(where relevant please add photo numbers)

1.Management Interview  
2.Document Review

**Recommended corrective action:**

It is recommended that the auditee should trying to get permission, and it will be done within a short period of time.

**Current Status:** Open.

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

Currently there was no dining facility in the factory premises to take meal for the workers. Interviewed workers confirmed that they are taking lunch in an open space and their house located near to the factory.

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

**Local law and/or ETI requirement:**
**As per Bangladesh Labor Rules 2015, rule-92:**

- a) The Dining Room must accommodate at least 15% of total workers.
- b) Adequate number of tables and benches with impervious surface must be arranged in proportion to the number of workers; provided that the Inspector General, considering the special situation, can change the percentage of the accommodation of workers in the Dining Room through a written notice.
- c) Part of the Dining Room and service counter thereof shall be kept separated for female workers with the use of curtain.

**Recommended corrective action:**

The factory management stated that they will ensure dining facility for the workers.

**Current Status:** Closed, during the facility visit, it was noted that the auditee has constructed a new building (Building 10) for workers dining with sufficient seating capacity.

**New:**
**3. Description of non-compliance:**

According to the facility visit, it was noted that 07 out of 07 hand-stitching workers was not using finger guard/hand gloves while working on the production floor. As per the risk assessment, all workers involved with hand-stitching shall use finger guard/hand gloves.

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

**Local law and/or ETI requirement:**
**Bangladesh Labor Rules 2015, Rule 67.2**

In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

**Recommended corrective action:**

1. Facility Visit  
2. Management & Worker Interview

1.Facility Visit (NC Photo No-01)  
2.Management Interview  
2.Worker Interview



It is recommended that the auditee should organize an effective training program and establish a robust monitoring system on PPE use.

#### Observation:

##### Description of observation:

None Observed

##### Local law or ETI requirement:

Not Applicable

##### Recommended corrective action:

Not Applicable

##### Objective evidence observed:

Not Applicable

#### Good Examples observed:

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

None Observed

##### Objective Evidence Observed:

Not Applicable

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

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##### 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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Personal files
- Age verification documents (i.e. national ID, birth certificate, age verification certificate)
- Local and national law
- Policies

##### Description of Current Status:

- The factory establishes a policy that will never employ and use any child labour under the age of 18 years old.
- The factory verifies all workers' original ID cards at the time of recruitment and keeps the photocopies of workers' ID cards in the personnel files.
- 52 employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo, and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth.
- No young-looking worker was found during facility visit.

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

Details: Child labour policy, child labour remediation policy, HR policy, worker's induction policy, workers age verification procedures, age and fitness certificate etc.

Any other comments: None

A: Legal age of employment:	18 Years
B: Age of youngest worker found:	19 Years

C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details Not Applicable

Non-compliance:	
<b>1. Description of non-compliance:</b>  None Observed  <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <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:	
<b>Description of Good Example (GE):</b> None Observed	<b>Objective Evidence Observed:</b>  Not Applicable

## 5: Living Wages are Paid

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### 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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Local and national law
- 03 sampled months' (November 2021, July 2021 & February 2021) timecards and wage sheets of 52 workers
- Sample pay slip
- Workers' personal files, maternity files and resigned workers' files
- Workers' contracts
- Leave register, maternity register
- Training records

##### Description of Current Status:

- Workers are getting their wages as per national legal standard and facility is providing wages within seven working days.
- The minimum wage paid by the factory is BDT8,000 per month as per minimum wage gazette revised on January 24, 2019.
- As per provided pay roll records all workers are getting minimum wage along with other benefits.
- Only deductions are made for unauthorized leaves.

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

Details: Details: Minimum wage policy, wage list, working time records & workers file, standing order & notice board.

Any other comments: None

### Non-compliance:

<b>1. Description of non-compliance:</b> None Observed <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <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
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<b>Observation:</b>	
<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

<b>Good Examples observed:</b>	
Description of Good Example (GE): 1. The factory provides attendance bonus to the workers. 2. 25% discount on product value of canteen. 3. Best performer award system in every month.	<b>Objective Evidence Observed:</b> Documents Review Workers and Management Interview

## Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 48 hours/week	A1: 48 hours/week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 12 hours/week	B1: 12 hours/week	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: BDT8,000/month	C1: BDT8,000/month	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 basic Wage	D1: 200% of basic wage	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If <b>No</b> , why not?	Not Applicable
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)	52 samples from November 2021 (current month) 52 samples from July 2021 (random month) 52 samples from February 2021 (random month)

C: Are there different legal minimum wage grades? If **Yes**, please specify all.

☐ Yes  
☐ No

C1: If **Yes**, please give details:

The Government announced the new pay structure on 08th October 2018 for the workers of the Garment Industries. The Gazette Notification has been published on 24th January 2019 for the implementation of the new pay structure. There are two separate pay structures: one for the garment workers and another for the employees.

For the workers

Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Medical (BDT)	Travel (BDT)	Meal (BDT)	Gross monthly wage (BDT)
Grade 1	10938	5469	600	350	900	18257
Grade 2	9044	4522	600	350	900	15416
Grade 3	5330	2665	600	350	900	9845
Grade 4	4998	2499	600	350	900	9347
Grade 5	4683	2342	600	350	900	8875
Grade 6	4380	2190	600	350	900	8420
Grade 7	4100	2050	600	350	900	8000
Probationer	2750	1375	600	350	900	5975

For the employees:

Grades	Basic wage (BDT)	House rent (50% × basic) (BDT)	Medical (BDT)	Travel (BDT)	Meal (BDT)	Gross monthly wage (BDT)
Grade 1	8184	4074	600	350	900	14072
Grade 2	6294	3147	600	350	900	11300
Grade 3	5950	2975	600	350	900	10775
Grade 4	4342	2171	600	350	900	8363
Probationer	2876	1438	600	350	900	6164

<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<p>D1: If <b>No</b>, please give details: full time employees and please state hour / week / month etc.</p>																
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th>Employee ID/ Designation (BDT)</th> <th>Gross Salary (BDT)</th> <th>Absent Day/ Absent Deduction (BDT)</th> <th>Attendance Bonus (BDT)</th> <th>OT Hour*rate/ OT payment (BDT)</th> <th>Other Allowance</th> <th>Deduction (Stamp &amp; Provident Fund) (BDT)</th> <th>Net Wages (BDT)</th> </tr> </thead> <tbody> <tr> <td>Helper</td> <td>8,000</td> <td>273</td> <td>0</td> <td>0</td> <td>00</td> <td>00</td> <td>7727</td> </tr> </tbody> </table>	Employee ID/ Designation (BDT)	Gross Salary (BDT)	Absent Day/ Absent Deduction (BDT)	Attendance Bonus (BDT)	OT Hour*rate/ OT payment (BDT)	Other Allowance	Deduction (Stamp & Provident Fund) (BDT)	Net Wages (BDT)	Helper	8,000	273	0	0	00	00	7727
Employee ID/ Designation (BDT)	Gross Salary (BDT)	Absent Day/ Absent Deduction (BDT)	Attendance Bonus (BDT)	OT Hour*rate/ OT payment (BDT)	Other Allowance	Deduction (Stamp & Provident Fund) (BDT)	Net Wages (BDT)											
Helper	8,000	273	0	0	00	00	7727											
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ____% of workforce earning under minimum wage            F2: ____% of workforce earning minimum wage            F3: 100% of workforce earning above minimum wage</p>																	
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found:</p> <p>Monthly attendance bonus and 02 Festival bonus per year for full time workers.</p> <p><i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p>																	
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Unauthorised absent deduction</p>																	
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>I1: Please list all deductions that <b>have</b> been made.</p> </td> <td style="width: 50%; vertical-align: top;"> <p>1. Unauthorised absent deduction.</p> </td> </tr> <tr> <td style="vertical-align: top;"> <p>I2: Please list all deductions that <b>have not</b> been made.</p> </td> <td style="vertical-align: top;"> <p>1. 2.  Please describe:</p> </td> </tr> </table>	<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Unauthorised absent deduction.</p>	<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1. 2.  Please describe:</p>												
<p>I1: Please list all deductions that <b>have</b> been made.</p>	<p>1. Unauthorised absent deduction.</p>																	
<p>I2: Please list all deductions that <b>have not</b> been made.</p>	<p>1. 2.  Please describe:</p>																	
<p>J: Were appropriate records available to</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																	



verify hours of work and wages?		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Workers job records were showing their actual in & out time. All sorts of meetings and training organized within their legal working time.	
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: The facility yet not calculate the living 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: As per law, the facility incremented worker's salary after one year of years of employment. Also, the increment has been made from December 2019 after wage revision by government. The payroll department is responsible to ensure the increment of workers and verify unauthorized deduction before payment.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Workers are paid on or before 7th working days of the following month in each pay period.	

<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  P1: Please give details:  The workers in the same position with same job responsibilities are paid equally and treated with equal opportunities, but it fluctuates when ones' years of employment is more than another.</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash  <input type="checkbox"/> Cheque  <input checked="" type="checkbox"/> Bank Transfer  <input type="checkbox"/> Other  Q1: If other, please explain:</p>

## 6: Working Hours are not Excessive

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

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

### ETI

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

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

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

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

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

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

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

## Current Systems and Evidence Examined

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

### Current systems:

#### Documents checked & comments:

- Management interview
- Worker interview
- Local and national law
- 03 sampled months' timecards (November 2021, July 2021 & February 2021) of 52 sampled workers were verified.
- Attendance register
- Complain register
- Production records
- Workers' payslip
- Production capacity plan
- Workers' contracts
- Policy on working hour

#### Description of Current Status:

- Regular working hours of the factory were found 8/day and maximum overtime was 2 hours/day. Overtime is voluntary, and workers are willingly doing overtime as per law.
- Friday is considered as weekly off day.
- The facility provides timecards and wage sheets from (November 2021, July 2021 & February 2021) of 52 sampled workers and working hours were found as per local law.
- Workers are getting one day off for every six days on average.

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

Details: Wages list, working time records, pay stub, workers file, standing order & notice board.

Any other comments: None.

#### Non-compliance:

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

None Observed

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

##### 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

<b>Working hours' analysis</b> Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Automatic electronic time keeping system.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
		Maximum number of days worked without a day off (in sample):			
		06 days			

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: N/A
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: N/A
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 12 hours/week in November 2021 (Current Month) 12 hours/week in July 2021 (Random Month) 12 hours/week in February 2021 (Random Month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The overtime hour does not exceed 60 hours per week
K: Approximate percentage of total workers on highest overtime hours:	15%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: 200% of basic wage per hour
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages: 200% of basic wage per hour
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 200% of the basic wage per hour.

<p>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.</p>	<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 N/A
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	N/A
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<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
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 7: No Discrimination is Practiced

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

### ETI

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

### Current Systems and Evidence Examined

To complete 'current systems' 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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Local and national law
- Personal files
- Compensation records
- Termination & retirement records
- Training records
- Complain register

##### Description of Current Status:

- Through the document review, management interview and workers interview; no discrimination was found in hiring, compensation, access to training, promotion, termination, or retirement.
- The factory provides the same pay to male/female employee.
- No record or complain was found of pregnancy test in recruiting the new workers

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

Details: Details: Discrimination policy, grievance handling procedure, hiring practices, wages list, training records, promotion records, termination or retirement policy and records, gender equality policy, age & fitness test records, freedom of association policy and disciplinary records etc.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 91% A2: Female 9 %
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,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation



national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details: There were no-discrimination practices in the factory.
---	--

Professional Development	
A: What type of training and development are available for workers?	Training such as workers induction, productivity, fire-safety, health and safety, safe machine operations, chemical handling, ethics and integrity and professional etiquette, better quality etc. are available for the workers.

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:
--	---

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

Not Applicable

**Good Examples observed:**

Description of Good Example (GE):  
None Observed

**Objective Evidence  
Observed:**  
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:

#### Documents checked & comments:

- Management interview
- Worker interview
- Local and national law
- Workers' personal files and service books
- Policies and procedures
- Wage sheets

#### Description of Current Status:

- Work performed is based on recognized employment relationship established through national law and practice.
- All workers were permanent and recruited directly by the factory.
- All workers are provided with written and understandable information about their employment conditions before they entered the employment.

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

Details: Workers personal records, service book, worker handbook, ID card, contract forms, HR policy, recruitment policy and job descriptions etc.

Any other comments: None.

Non-compliance:	
<b>1. Description of non-compliance:</b> None Observed  <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <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:	
<b>Description of Good Example (GE):</b> None Observed	<b>Objective Evidence Observed:</b> Not Applicable

## Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions

	A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:
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: N/A
D: If any checked, give details:	N/A

<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:	There are no migrant workers in the facility.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A	C2: Observations: N/A

<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 <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles:</p> <p>N/A</p>
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## NON-EMPLOYEE WORKERS

Recruitment Fees:	
<p>A: Are there any fees?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>B: If yes, check all that apply:</p>	<p> <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         </p> <p>B1 – If other, please give details: N/A</p>
<p>C: If any checked, give details:</p>	<p>N/A</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: Not Applicable</p>

B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details: N/A
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: N/A

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

### 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:

##### Documents checked & comments:

- Management interview
- Worker interview
- Production capacity plan
- Goods in/out register
- Production process of the factory
- Policies and procedures

##### Description of Current Status:

- Through the management and workers interview, facility is doing all production process in factory premises.
- Verified through document review, factory tour, management interview and employee interview that there is no sub-contracting, and no homeworking was used by this factory.

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

Details: Sub-contracting policy, management system, capacity plan, production status etc.

#### **If any processes are sub-contracted – please populate below boxes**

Process Subcontracted	Process 1	Process 2
Name of factory		
Address		

Process Subcontracted	Process 3	Process 4
Name of factory		
Address		

Process Subcontracted	Process 5	Process 6
Name of factory		
Address		



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Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p>None Observes</p> <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> NC against ETI/Additional Elements</span> <span><input type="checkbox"/> NC against Local Law</span> </div> <p><input type="checkbox"/> NC against customer code:</p> <p><b>Local law and/or ETI /Additional Elements requirement:</b></p> <p>Not Applicable</p> <p><b>Recommended corrective action:</b></p> <p>Not Applicable</p>	<p><b>Objective evidence observed:</b></p> <p><i>(where relevant please add photo numbers)</i></p> <p>Not Applicable</p>

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

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

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 20px;"> <input type="checkbox"/> Yes  <input type="checkbox"/> No         </div> <div> <p>A1: Please describe: N/A</p> </div> </div>

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: N/A
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: N/A
E: What checks are in place to ensure no child labour is being used and work is safe?	

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:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

## 9: No Harsh or Inhumane Treatment is Allowed

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

### ETI

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

Additional elements:

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

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: Meeting minutes of workers participation committee are available for reviewing
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Grievance boxes are kept in both male & female toilet in a safe place. Interviewed workers were aware of grievance handling system of the factory.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Grievance box & hotline
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: There is an open-door policy in place as well as workers can raise their grievance through worker's committee and grievance box which has been kept in confidential place (toilet). The facility kept a grievance box outside of the factory for the stakeholders.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain

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
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

### 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:

##### Documents checked & comments:

- Management interview.
- Worker interview.
- Complain register.
- Policies and procedures.
- Facility visit.

##### Description of Current Status:

- Through the management and workers' interview, it was noted that no physical abuse or discipline happened in the factory and the disciplinary procedure of the factory is verbal warning and education.
- The factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- The facility management is maintaining a grievance log to keep records of both verbal and written complaints.
- No complain was found in complain register related to the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.

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

Details: Policy on anti-harassment and physical abuse, disciplinary records, worker interview, grievance mechanism etc.

Any other comments: None

#### **Non-compliance:**

<b>1. Description of non-compliance:</b> None Observes <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI requirement:</b> None Applicable  <b>Recommended corrective action:</b> None Applicable	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  None Applicable
--	--

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

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

##### Documents checked & comments:

- Management interview
- Worker interview
- Employment records
- Appointment letter
- Personal files

##### Description of Current Status:

- Through the management, only workers with a legal right to work shall be employed or used by the factory.
- There were no agency staffs, employment agencies and immigration workers found in the factory.

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

Details: Policy on recruitment, worker interview, personal file verification etc.

Any other comments: None

### Non-compliance:

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

None Observed

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

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

Not Applicable

#### Recommended corrective action:

Not Applicable

#### Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

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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

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

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

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

### B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

### B4. Guidance for Observations

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

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

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

## Current Systems and Evidence Examined

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

### Current systems:

#### Documents checked & comments:

- Management interview
- Worker interview
- Environment related license, certificates and permission
- Policies and procedures

#### Description of Current Status:

- The factory has conducted Environment Impact Assessments and according to this report the operational impacts like stack air emission level from both boiler & generator, noise, temperature, humidity, and light level were found within the environmental standards.
- The factory has developed Environmental policy and procedures and wastage disposal policy.



- Md. Saleh Akram-Assist. Manager (Compliance and EMS) is assigned as manager responsible for Environmental issues.
- The sludges from effluent treatment plant (ETP) were kept in open space which may cause contamination after coming contact with rainwater.

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

Details: Environmental policy, implementation, environmental quality parameters, supplier agreement and environmental permits etc.  
Any other comments: None.

### Non-compliance:

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

According to the facility visit, it was noted that the sludges from effluent treatment plant (ETP) were kept in an open space which may cause contamination after coming contact with rainwater.

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

☐ NC against Local

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

##### As per ETI Base Code 10B4.7:

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

#### Recommended corrective action:

It is recommended that the auditee should keep sludges in a closed area.

#### Objective evidence observed:

(where relevant please add photo numbers)

- 1.Facility visit (NC Photo No-02)
- 2.Management Interview

### Observation:

#### Description of observation:

None Observed

#### Local law or ETI/Additional elements requirements:

Not Applicable

#### Comments:

Not Applicable

#### Objective evidence observed:

Not Applicable

### Good examples observed:

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

1. Installed solar panel.
2. Installed energy savings lights throughout the facility.
3. Initiated plantation program.

#### Objective Evidence Observed:

Facility visit and management interview  
Documents Review

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Md. Saleh Akram-Assist. Manager (Compliance and EMS)
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has conduct risk assessment on their impact on environment due to their operation. Moreover, they have conducted Environmental Impact Assessment (EIA) and made an Environmental Management Plan (EMP) according to the EIA.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory has ISO 14001:2015 (Certificate number: AJAEU/20/16125) certification.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? Facility has an environmental policy which is been posted in their notice board for visible to the workers and visitors.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility management conducted Environmental Impact Assessment to assess the key impacts of environment through their day-to-day activities.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The factory does not have any other sustainability system in place.
H: Have all legally required permits been shown? Please gives details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: All legally required permits such as: Factory operating license, Trade license, fire license, ERC, IRC, boiler certificate, EPB certificate except have been shown during audit.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details:

	For environmental issues, the facility meets the requirements of all applicable local rules and regulations.	
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has two Energy Efficiency program named RedE & Gigaton to reduce energy consumption and discharge of wastes.	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The factory sets the target for next 5 year: Water consumption 1%, Discharge 1%, waste 1%, Energy & GHG emission 1%. Also, they have deed with authorized waste collecting vendor who collects all types of waste from the factory.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility has installed relevant meter to measure the consumption of key utilities of water and energy and keeps daily consumption records.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility has installed relevant meter to measure the consumption of key utilities of water and energy and keeps daily consumption records.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has an internal monitoring procedure to monitor the environmental practice of their existing and potential subcontractors and suppliers. However, they did not share their environment policy with their significant business partners.	
<b>Usage/Discharge analysis</b>		
Criteria	Previous year: Please state period: 2021	Current Year: Please state period: 2022
Electricity Usage: Kw/hrs	3528250	0
Renewable Energy Usage: Kw/hrs	325935	0
Gas Usage: Kw/hrs	1080298.33 m3	0
Has site completed any carbon Footprint Analysis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	69943 kg	N/A

Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>Ground water</li> </ul>	<ul style="list-style-type: none"> <li>Ground water</li> </ul>
Water Volume Used: (m <sup>3</sup> )	35371	0
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>Wastewater</li> </ul>	<ul style="list-style-type: none"> <li>Wastewater</li> </ul>
Water Volume Discharged: (m <sup>3</sup> )	227	0
Water Volume Recycled: (m <sup>3</sup> )	0	0
Total waste Produced <i>(please state units)</i>	59573 Kg	0
Total hazardous waste Produced: <i>(please state units)</i>	1837 Kg	0
Waste to Recycling: <i>(please state units)</i>	11295 Kg	0
Waste to Landfill: <i>(please state units)</i>	861.8 Kg	0
Waste to other: <i>(please give details and state units)</i>	0	0
Total Product Produced <i>(please state units)</i>	Padding + quilting = 17102061 yrd Needle punch = 6984104 sqm Eco Down + Ball Fiber = 2090483 kg Home ware + Geo Bag = 6069296 pcs	Padding + quilting = 17102061 yrd Needle punch = 6984104 sqm Eco Down + Ball Fiber = 2090483 kg Home ware + Geo Bag = 6069296 pcs

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

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

To be completed for a 4-Pillar SMETA Audit

#### 10C. Compliance Requirements

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

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

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

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

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

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

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

#### 10C. Guidance for Observations

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

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

Facility has written supplier selection policy and implementation.

- Management interview
- Worker interview
- List of authorized subcontractors
- Policies and procedures

#### Description of Current Status:

- The factory has a policy on Anti-Corruption and Anti-Bribery.
- The management has communicated their policy with all of their business partners.
- The factory provides regular training to the workers on the policy.
- There is reward system for employees for the act of ethical behavior and also for notify any ethical cases to management.
- S.M Shafiqul Islam (Assistant General Manager- HR & Compliance) is responsible for the implementation of business ethics.

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

Details: Supplier and subcontractor selection policy, anti-corruption and anti-bribery policy, goods in & out register, etc.

Any other comments: None

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

None Observed

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

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

Not Application

**Recommended corrective action:**

Not Application

**Objective evidence observed:**

(where relevant please add photo numbers)

Not Application

**Observation**
**Description of observation:**

None Observed

**Local law or ETI/Additional elements requirement:**

Not Application

**Comments:**

Not Application

**Objective evidence observed:**

Not Application

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

None Observed

**Objective Evidence Observed:**

Not Application

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

☒ Internal Policy  
☒ Policy for third parties including suppliers

A1: Please give details:

	<p>Facility has an anti-corruption and anti-bribery policy for their employees as well as for the suppliers and subcontractors. The facility management has provided training to their employees on the policy. Moreover, the facility has identified the areas of corruption and takes necessary steps to reduce the risk of those areas.</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: Please give details:</p> <p>Facility management provides training to HR personnel, Merchandisers, Procurement department, Production and IE department on anti-corruption and supplier selection policy.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please give details:</p> <p>The policy is been updated on a regular basis.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details:</p> <p>The factory has shared Ethics policy with their business partners.</p>

Other findings

Other Findings Outside the Scope of the Code
None

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






## Appendix 1

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

☒ Not Applicable please x

## Photo Form

### General Photos:

 <p>Jan 5, 2022 9:31:51 AM Mymensingh District Mymensingh Division</p>	 <p>5 Jan 2022 10:42:15 am Mymensingh District Mymensingh Division</p>	 <p>Jan 5, 2022 10:19:34 AM Mymensingh District Mymensingh Division</p>
Factory Gate	Factory overview	Cotton area
 <p>Jan 5, 2022 10:27:39 AM Mymensingh District Mymensingh Division</p>	 <p>Jan 5, 2022 9:52:43 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>5 Jan 2022 10:01:29 am ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>
Comforter section	Cutting section	Ironing section



Needle punch section



Padding section



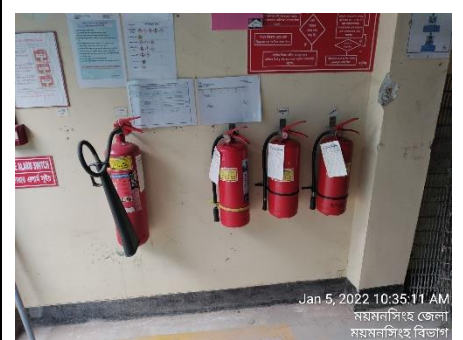
Quilting section



Sewing section



Firefighting equipment



Fire extinguishers



PA system



Fire alarm switch



Fire alarm bell



Evacuation plan















Smoke detector












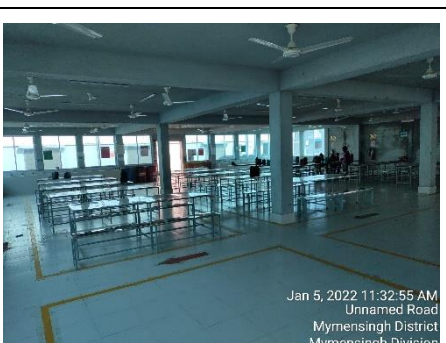


Fire hydrant pump





 <p>Jan 5, 2022 10:08:09 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 11:00:23 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 11:02:11 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>
Emergency light	Fire control panel	Emergency IPS backup
 <p>Jan 5, 2022 11:17:55 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 11:30:55 AM Unnamed Road Piragoan Mymensingh District Mymensingh Division</p>	 <p>Jan 5, 2022 9:54:07 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>
Sub station	Fire alarm call point checked	Water hose reel box
 <p>Jan 5, 2022 11:24:41 AM Unnamed Road Mymensingh District Mymensingh Division</p>	 <p>Jan 5, 2022 10:08:49 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 10:36:11 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>
Hydrant water pressure checked	ETI CoC posted	Policy board
 <p>Jan 5, 2022 10:29:38 AM Mymensingh District Mymensingh Division</p>	 <p>5 Jan 2022 9:53:30 am ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>5 Jan 2022 9:53:41 am ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>
Grievance box	Toilet	Hand wash point



 <p>5 Jan 2022 9:32:44 am Mymensingh District Mymensingh Division</p>	 <p>5 Jan 2022 9:33:30 am Mymensingh District Mymensingh Division</p>	 <p>5 Jan 2022 9:33:45 am Mymensingh District Mymensingh Division</p>
Childcare room	Medical room	Medicine store cabinet
 <p>Jan 5, 2022 10:32:12 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 10:36:17 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 10:38:52 AM Mymensingh District Mymensingh Division</p>
Waste keeping area	Electronic attendance device	First aid box
 <p>Jan 5, 2022 11:07:33 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 11:17:12 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 11:18:22 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>
Eye wash station	Generator	Compressor
 <p>Jan 5, 2022 11:35:57 AM Unnamed Road Mymensingh District Mymensingh Division</p>	 <p>Jan 5, 2022 11:01:05 AM ময়মনসিংহ জেলা ময়মনসিংহ বিভাগ</p>	 <p>Jan 5, 2022 11:32:55 AM Unnamed Road Mymensingh District Mymensingh Division</p>

Boiler	ETP	NC Corrected: Workers dining area
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### NC Photos:

	
NC Photo No-01. Hand-stitching workers was not using finger guard/hand gloves.	NC Photo No-02. ETP sludge kept in open place.



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

**[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY\\_2brg\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

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

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