




Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 310724679	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 310725048
Business name (Company name):	RBR Garments (P) Ltd.		
Site name:	RBR Garments (P) Ltd.		
Site address: <i>(Please include full address)</i>	177 / 3A1 M.P.Mill Thottam, Pachankattupalayam, Arulpuram, Tirupur- 641 605, Tamil Nadu.	Country:	India
Site contact and job title:	Mr.Vinothkumar- Group Manager- HR & Admin		
Site phone:	+91 421 6531456	Site e-mail:	hrm@rbrindia.com
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input checked="" type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	9 th and 11 th September 2017		

Audit Company Name & Logo: 	Report Owner (payee): RBR Garments (P) Ltd. <i>(If paid for by the customer of the site please remove for Sedex upload)</i>
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Audit Conducted By					
Commercial	<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)			

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 6.0 April 2017 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: **Kasiviswanathan Chokkalingam**

Team auditor: **None**

Interviewers: **None**

Report writer: **Kasiviswanathan Chokkalingam**

Report reviewer: **Ms. Pinar Alpaslan**

Date of declaration: **9th & 11th September 2017.**

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.

Non-Compliance Table

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*:			NC Findings Only (note to auditor, summarise in as few words as possible NC's only)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		NIL	NIL	None Observed
0B	Management systems and code implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NIL	NIL	NIL	None Observed
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	NIL	NIL	NIL	None Observed
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	NIL	NIL	NIL	None Observed
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01	NIL	NIL	1. To provide safety guards on all sewing machines.
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	NIL	NIL	NIL	None Observed
5	Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	NIL	NIL	NIL	None Observed
6	Working Hours	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	NIL	NIL	NIL	None Observed
7	Discrimination	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	NIL	NIL	NIL	None Observed
8	Regular Employment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NIL	NIL	NIL	None Observed

8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NIL	NIL	NIL	None Observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NIL	NIL	NIL	None Observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NIL	NIL	NIL	None Observed
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NIL	NIL	NIL	None Observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	Not Applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	Not Applicable
General observations and summary of the site:									
This Site is well-committed towards social compliance and it was understood from the interaction with management that they are going to implement SA 8000 2014 standard at very earliest.									

**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:	RBR Garments (P) Ltd.																			
B: Site name:	RBR Garments (P) Ltd.																			
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	<p>Factory License- TP 11331 for 500 employees and having validity till 31/12/2017.</p> <p>Fire license- 837/2017 - Obtained on 04/05/2017 and having validity till next one year.</p> <p>Stability certificate- 3086/2917- Obtained on 08/08/2017 and having validity till next three years.</p>																			
D: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Manufacture of Knitted Garments.																			
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>RBR Garments (P) Ltd is located at 177 / 3A1 M.P.Mill Thottam, Pachankattupalayam, Arulpuram, Tirupur- 641 605, Tamil Nadu, India.</p> <p>RBR Garments (P) Ltd had started their operations in the existing location since 2004.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Block 1</td> <td>Administrative, Sewing and Finishing.</td> <td>N/A</td> </tr> <tr> <td>Block 2</td> <td>Cutting</td> <td>N/A</td> </tr> <tr> <td>Block 3</td> <td>Dinning Hall, Creche and Toilets</td> <td>N/A</td> </tr> <tr> <td>Block 4</td> <td>Female Hostel</td> <td>N/A</td> </tr> <tr> <td>Is this a shared building?</td> <td>NO</td> <td>N/A</td> </tr> </tbody> </table> <p>The total area of the factory is 50,000 square feet. The factory's manufacturing activities are carried out in Four concrete building with Ground floor only.</p> <p>A total of 172 employees are currently working in the facility, which included 169 production employees and 40 non-production employees. Out of 172 employees, 92 male employees and 80 female employees. All company employees are directly engaged by the facility.</p> <p>The facility does not employ any foreign nationals.</p>		Production Building no	Description	Remark, if any	Block 1	Administrative, Sewing and Finishing.	N/A	Block 2	Cutting	N/A	Block 3	Dinning Hall, Creche and Toilets	N/A	Block 4	Female Hostel	N/A	Is this a shared building?	NO	N/A
Production Building no	Description	Remark, if any																		
Block 1	Administrative, Sewing and Finishing.	N/A																		
Block 2	Cutting	N/A																		
Block 3	Dinning Hall, Creche and Toilets	N/A																		
Block 4	Female Hostel	N/A																		
Is this a shared building?	NO	N/A																		

	<p>Factory has provided hostel facility to women employees. The hostel is located within the organisation premises, in a separate block. There are 10 rooms in the hostel with 5 toilets and 35 women employees staying in the ladies hostel. Inmates are from neighbouring districts within Tamil Nadu. Sufficient toilets and washing facilities has been provided in Ladies Hostel.</p> <p>The employees work 6 days a week in one shift and Sunday is holiday.</p> <p>The working hours as under: Normal working hours : 08.30 am to 05.30 pm Morning tea break : 10.30 am to 10.45 am Lunch break : 12.45 pm to 01.30 pm Evening tea break : 03.30 pm to 03.45 pm Weekly holiday : Sunday</p> <p>Visible structural integrity issues (large cracks) observed and without structural engineer evaluation</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No Details:</p>
F: Site function:	<p><input type="checkbox"/> Agent</p> <p><input checked="" type="checkbox"/> Factory Processing/Manufacturer</p> <p><input type="checkbox"/> Finished Product Supplier</p> <p><input type="checkbox"/> Grower</p> <p><input type="checkbox"/> Homeworker</p> <p><input type="checkbox"/> Labour Provider</p> <p><input type="checkbox"/> Pack House</p> <p><input type="checkbox"/> Primary Producer</p> <p><input type="checkbox"/> Service Provider</p> <p><input type="checkbox"/> Sub-Contractor</p>
G: Month(s) of peak season: (if applicable)	Uniform throughout the Year
H: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Fabric receipt-Cutting-Sewing-Checking-Finishing and Dispatching.</p> <p>The factory produces knitted garments for Men, Women and Children.</p> <p>The production capacity of the factory is 1, 25,000 garment pieces per month.</p> <p>There are 04 sewing lines with 110 machines in total.</p> <p>Utility equipment like Electricity Generator and Air compressor had been installed.</p>

I: 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
J: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
K: Are there any on site provided worker accommodation buildings e.g. dormitories	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Factory has provided hostel accommodations to 20 % of female employees.
L: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
M: Were the site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details :

Audit Parameters			
A: Time in and time out	Day 1 Time in: 10.00 am Day 1 Time out: 06.00 pm	Day 2 Time in: 10.00 am Day 2 Time out: 06.00 pm	Day 3 Time in: Day 3 Time out:
B: Number of Auditor Days Used:	One Auditor in Two Days		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Vinothkumar. KP- Group Manager- HR & Admin		
H: Is further information available (if Y please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Was any previous audit reviewed during this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	N/A		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	N/A- There is no Trade Union or Trade Union Representation in the Company		

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 and where they do not intend to remain permanently 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	92	0	0	0	0	0	0	92
Worker numbers – female	80	0	0	0	0	0	0	80
Total	172	0	0	0	0	0	0	172
Number of Workers interviewed – male	10	0	0	0	0	0	0	10
Number of Workers interviewed – female	16	0	0	0	0	0	0	16
Total – interviewed sample size	26	0	0	0	0	0	0	26

A: Nationality of Management	Indian
B: Majority nationality of workers	Main countries: 1 Country 1: INDIA approx % total workforce: 100%
C: Worker remuneration (<i>management information</i>)	<p>__0__% workers on piece rate __0__% hourly paid workers __100__% salaried workers</p> <p>Payment cycle: _____% daily paid _____% weekly paid __100__% monthly paid _____% other – please give details</p>

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	Two Groups of 05 female employees and Two group of 05 male employees.	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 10	Female: 16
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, 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?	No any negative comments received from any of the interviewed employees.	
I: What did the workers like the most about working at this	Workers like the direct involvement of	

site?	Mr.Vinothkumar. KP- Group Manager- HR & Admin in the day-to-day affairs of the factory and about the timely payment of salary and the general behaviour of all supervisors.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Satisfactory
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If Yes, please give details:</i>	
M: Attitude of workers: <i>(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</i>	
06 employees were interviewed individually and 20 employees were interviewed in a group. Employees belonging to various departments and age groups were selected at random for interviews. No negative comments were raised by the employees against the management. The employees are satisfied with the work environment and the facilities provided by the employer. The site walkthrough and employees interview did not raise any concerns about the behaviour of employees. The attitude of the workers towards the management was positive.	
N: Attitude of worker's committee/union reps: <i>(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</i>	
Worker Representatives of the following committees were interviewed:- 1. Workers' Committee 2. Health and Safety Committee 3. Grievance Handling Committee 4. Internal Complaints' Committee for Women (Anti-Sexual Harassment Committee) No negative comments were raised by the worker representatives against the management. It was evidenced during the interview that representatives and workers are free to approach the management for any kind of grievances and that all grievances are being attended to immediately.	
O: Attitude of managers: <i>(Include attitude to audit, and audit process. Both positive and negative information should be included)</i>	
The approach of the company management was positive during the audit process. All documentation requested for review was provided in time. No locked areas were identified during the audit. The management accepted the non-conformances that were raised.	

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. A Human Rights Policy had been defined by the company for delivering compliance to the National and International Human Rights requirements.
2. The company has fundamentally committed itself to respect Human Rights, consistent with the UN Universal Declaration of Human Rights. The said Policy had been displayed in company notice board, in English and local language (Tamil).
3. Mr.Vinothkumar. KP- Group Manager- HR & Admin of the Company is directly involved in the implementation of the requirements of this policy.
4. Being a small factory Mr.Vinothkumar. KP- Group Manager- HR & Admin is taking care of all activities and he is the responsible for implementing standards concerning Human rights.
5. Company had identified their stake holders and had communicated the policy on human rights to them.

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

1. Human Rights Policy
2. Display of ETI Base Code.
3. Grievance Redressal Procedure.
4. Complaint/Suggestion Box Operating Procedure.

5. Human Rights Training Records.

Any other comments: Nil

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The company had established a policy dated 01/01/2013 and revised on 01/07/2017 which expresses its commitment to respect 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: Mr.Vinothkumar. KP Job title: - Group Manager- HR & Admin
C: Does the businesses 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 Please give details: Suggestion/ Complaint boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any. The factory has established a Suggestion/Complaint procedure and had communicated the same to the employees. As per the procedure, the suggestion boxes are opened periodically in the presence of worker committee representative. On receipt of any suggestions or complaints, the same is recorded in the Complaints/ Suggestion Register and are dealt with the established procedure.
D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The privacy of the workers' information was found to be maintained throughout the business module of the company.

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year: __1__ %	This year __1__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	Nil	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year: _23_ %	This year _34_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	10%	15%
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Statutory Accident Registers (Form 26 & Form 26A) are being maintained. Review of records show that no accident had happened during the last two years.	
F: Annual Number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100] / Number of total workers]	Last year: 2016 Number: Nil	This year: 2017 Number: Nil
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]	Last year: 2016 Number: Nil	This year: 2017 Number: Nil
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year:2016 Number: Nil	This year:2017 Number: Nil
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months 0 % workers	6 months 0 % workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months 0 % workers	12 months 0 % workers
K: % Workers report that they know what paid leave is due to them (I.e. is it communicated and understood)	All workers had been communicated on their paid leave calculations and the interviewed employees understand the same.	
L: % complaints resolved / grievances responded to.	_____% complaints / grievances responded to No complaints/grievances received	_____% complaints / grievances responded to No complaints/grievances received

0B: Management system and Code Implementation

[\(click here to return to NC Table\)](#)

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

Current Systems and Evidence Examined

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

Current systems:

1. A Social Accountability Policy has been defined by the company for delivering compliance to the ETI Code.
2. The company has committed itself to confirm to all the requirements of ETI Base Code and applicable local laws. The said Policy had been displayed in company notice board, in English and local language (Tamil).
3. Mr.Vinothkumar. KP- Group Manager- HR & Admin of the Company is directly involved in the implementation of the requirements of this standard.
4. Company had displayed ETI Code of Conduct in a place visible to all employees.
5. The awareness on the elements of the code was found adequate among the interviewed employees.

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

- 1.Social Accountability Policy
2. Display of ETI Base Code
3. ETI Training Records

Any other comments: Nil

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe:
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Review of records, interview of employees and interactions with the Management show that the implementation of the Management System is being effective.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The workers have received training on the requirements pertaining to forced labour, child labour, discrimination, harassment & abuse based ETI Base Code on 31.08.2017
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Training on the requirements of ETI Base Code had been imparted on 31.08.2017, interview with employee's show that their awareness on the requirements of the standard was found adequate.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Factory has been certified for WRAP and SA 8000 through RINA. Moreover factory has been undergoing social compliance audit periodically for Walmart, Disney and no any significant issues were found.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mr.Vinothkumar. KP- Group Manager- HR & Admin is responsible for all activities, including Human Resource Management.
H: Is there a senior person /manager responsible for implementation of the Code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Mr.Vinothkumar. KP- Group Manager- HR &

	Admin is responsible for the 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 Please describe: The company had established a policy on ensuring confidentiality of worker information.
J: Is there an effective procedure to ensure confidential information is kept confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The company had implemented a procedure on ensuring confidentiality of confidential information.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Internal audits and Management review meetings (MRM) are being conducted periodically to evaluate the performance of the facility's management system as against the requirements of the standard. The latest Internal audit and MRM had been conducted 17/06/2017 and 24/06/2017.
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 Details: Company has conducted risk assessment periodically and latest reviewed on 01/07/2017.
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 Details: The facility had established a Supplier Control Plan and Procedure to ensure that their suppliers confirm to the requirements of the standard.
Land rights	
N: Does the site have all required land rights licenses and permissions (<i>see SMETA Measurement Criteria</i>)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility operates in a rented building. Review of legal records show that the landlord had obtained necessary legal documents and approvals which had conferred legal land rights over the land. Statutory approvals had been obtained for construction of the facility buildings.

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 Details: The facility operates in a rented building under a valid Rental Agreement with the landlord.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: The facility had committed itself to confirm to the requirements of Local laws on all aspects, as per the Social Accountability policy of the facility.
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility operates in a rented building under a valid Rental Agreement with the landlord.
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility operates in a rented building under a valid Rental Agreement with the landlord. Review of legal records show that the landlord had obtained necessary legal documents and approvals which had conferred legal land rights over the land.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details:

Non-compliance: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective evidence observed:

Not Applicable

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Interview with employees show that workers have volunteered themselves for the job and there had been no coercion to make them work in the facility
2. As per the employee and management testimony, the facility provides training to new employees prior to starting their work.
3. Workers are not required to deposit any identity papers or original documents with the facility as a precondition for employment.
4. As per the management and interviewed workers, there is no "lock-in" or notice period that a worker is required to give before he leaves the job.
5. The facility does not withhold any payments as well.
6. Workers are free to leave the services as and when required, after informing the management of their decision.
7. The facility prohibits all relevant individuals, including any person under the facility's direction, such as security guards, from coercing employees in any way, or unnecessarily limiting employees' freedom of movement.
8. There is no presence of any prison labor at the work place.
9. Company had documented policy against forced, bonded or involuntary labor.

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

1. Recruitment Policy and Procedures
2. Duties and responsibilities of the Factory Manager and Accounts/HR Executive.
3. Personal files
4. Appointment orders
5. Internal employment rules and regulations.

Any other comments: Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 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 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 Please describe finding:
E: If any part of the business is UK based / registered & turnover is 36m+ there is a requirement to publish a 'modern day slavery statement'. F: Is there a modern day slavery statement published	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: <input checked="" type="checkbox"/> Not applicable
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 Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in it's supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes please give details and category of workers affected: The facility had established a Supplier Control Plan and Procedure to ensure that their suppliers confirm to the requirements of the standard. <input type="checkbox"/> Not applicable
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 Please describe finding: The facility had established Policy and Procedures against Forced Labour and the effectiveness of the policy and procedures are

	monitored through Internal Audits and Management Review Meetings.
--	---

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence

observed: Not

Applicable

(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence

observed: Not

Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective evidence

observed: Not

Applicable

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

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

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:

1. The facility does not have any labour union.
2. The management stated that they are not averse of having a union if the workers feel the need of it.
3. The interviewed workers stated that they appreciate open door policy of management and never felt the need of forming a union.
4. Employees can give suggestions or complaints to the facility through the suggestion boxes.
5. Interviewed workers also reported that they are comfortable discussing issues of concern with the management and workers committee and have seen appropriate actions been taken to address the concerns in past.
6. Workers had unanimously elected Mr.Krishnamoorthy and Mrs.Shanmugakani as their representatives from among themselves and had formed a Workers' Committee. Minutes of the meeting had been documented and verified.
7. There was no evidence of suppression of workers' rights.
8. The company has a policy of supporting and protecting freedom of association of their employees.
9. This requirement is adequately addressed in the company's Policy and Procedures on Freedom of Association, which shows respect for the rights of all personnel to form or join trades unions of their choice or to engage in collective bargaining.
10. The organization recognizes the right of its employees to establish, to register and to organize trade unions as they wish, and the right to bargain collectively; the organization respects this right and informed its employees that they are free to join such an organization without negative consequences.
11. A Workers' Committee, comprising of elected worker representatives, meets once in 2 months and the minutes of the meeting are recorded and communicated to the management for action.

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

1. Policy and Procedures on Freedom of Association

2. Workers' Committee Meeting records.

3. Worker Representative Election Records.

Any other comments: Nil

A: 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	
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 Yes. It is mandatory to have an Internal Complaints Committee for Women in all companies.	
D: Is there any other form of effective worker/management communication channel? (<i>Other than union/worker committee</i>) e.g. H&S, sexual harassment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Suggestion boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any. The suggestion boxes are opened periodically in the presence of worker committee representative. On receipt of any suggestions or complaints, actions are intended to be taken and to record the same in a register. Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Workers had elected representatives from among themselves and had formed worker committees.	
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 Details:	
F: Name of union and union	There are no unions or	Is there evidence of free elections?

representative, if applicable:	union representatives within the company	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees?	Workers had elected representatives from among themselves and had formed worker committees.	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	Date of last election:09.03.2017
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 02	
L: State any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	<p>Review of records show that the following committees had held meetings on the respective dates:</p> <p>Health & Safety committee, conducted once in 2 months, recent meeting minutes dated 22/08/2017.</p> <p>Worker and Grievance meeting conducted in the frequency of once in 2 months, recent meeting minutes dated 31/08/2017.</p> <p>Anti-sexual harassment committee, conducted once in a months, recent meeting minutes dated 21/08/2017.</p> <p>Employees are not subjected to virginity or pregnancy test under any circumstances. Vaigai Trust-NGO has participated in the last committee/dated-21/08/2017.</p> <p>SA 8000 awareness is being conducting once in 6 months. Latest conducted on 19/05/2017 training records is being maintained and Verified.</p> <p>The results of the meetings had been recorded in a register and had been acknowledged by the participants.</p> <p>The worker representatives had been entrusted with communication of results to the employees.</p>	
M: Are any workers covered by	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Collective Bargaining Agreement (CBA)		
N: If Yes what percentage by trade Union/worker representation	____% workers covered by Union CBA	____% workers covered by worker rep CBA
O: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence

observed: Not Applicable
(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence

observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective evidence

observed: Not Applicable

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Mr.Vinothkumar- Group Manager- HR & Admin had been entrusted with the responsibility to ensure a healthy and safe work environment.
2. Workplace environment appeared to be clean and safe.
3. Company had trained 20 employees in the operation of firefighting equipment and trained for 15 employee's on first aid appliances.
4. Company has provided 08 First Aid Box with adequate contents.
5. Company has provided purified drinking water points for their employees free of cost.
6. Company has provided 10 Toilets and Urinals-08 for male employees.
7. Company had provided 14 Toilets for female employees.
8. Company had provided 29 Fire Extinguishers and Portable sprinklers in potential area.
9. Personal protective equipment like Nose Masks, Gloves, Ear Plugs, Goggles, Safety Shoes, Apron and Rubber Mats had been provided to all the concerned employees free of cost.
10. Fire Buckets have been provided.
11. Last fire drills had been conducted on 12.08.2017 and reports found satisfactory.
12. The facility premises are structurally safe company floors are organised and clean.
13. Adequate air and ventilation are provided.
14. The production floor of the company has one separate emergency exits with illuminated signs identifying

the same.

15. The company had established a Policy and related Procedures on Health & Safety of the employees.

16. A Health & safety committee had been formed with representatives from workers and management.

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

1. Health and safety policy and procedures

2. Risk Assessment Report

3. Training records and certificates

4. Fire equipment maintenance records

5. Fire drill records

6. First Aid Training Records

7. Accident reports

8. Interviews with H&S manager

9. Interviews with workers and H&S committee members

Any other comments: Nil

<p>A: Does the facility have general Health & Safety and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details: It has been communicated through Induction training itself. Latest training conducted on 31/08/2017.</p>
<p>B: Are the policies included in worker's manual?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details:</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Details:</p>

<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Details:</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Details:</p> <p>It is not mandatory to provide a medical room or medical facility considering the number of workers involved.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Details:</p> <p>First Aid Training had been provided to 10 employees through St. Johns Ambulance.</p>
<p>G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Details: N/A</p>
<p>H: Secure personal storage space is provided for workers in their living space and is fit for purpose</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Details: N/A</p>
<p>I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Details:</p> <p>A H&S Risk Assessment had been reviewed on 01.07.2017 covering all departments, including the risk of driving after long hours of work. No overtime has been performed on all selected pay periods.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

disposal of natural resources	Please describe The facility had been categorised under White Category (Non Polluting Industries) as per the notification of the Tamilnadu Pollution Control Board dated 02.08.2016 and hence exempted from obtaining environmental permits.
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 Please describe-

Non-compliance: One

1. Description of non-compliance: It was noted from site tour that company has not provided needle and eye-guard on 30 % of sewing machines. <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Local law and/or ETI requirement: In accordance with Factories Act 1948, Section 26 (1) (a), every set screw, bolt or key on any revolving shaft, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger. Recommended corrective action: It is recommended the facility to provide safety guards on all sewing machines.	Objective evidence observed: Site Tour. <i>(where relevant please add photo numbers)</i>
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Observation: None Observed

1. Description of observation: None Observed Local law or ETI requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable
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Good Examples observed: None Observed

Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable
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4: Child Labour Shall Not Be Used

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. School Leaving Certificate, School Mark Sheet, Driving License, National Identification Card (Aadhaar Card) or any age proof certificate issued by the Government are considered/verified at the time of recruitment from all the employees.
2. In the non-availability of the above said documents the certificate issued by a Dental Surgeon regarding the age of the employee had been accepted.
3. Site tour, physical appearance of employees and interviews with employees shows that child labour or young labor is not being employed by the Company.
4. During the walkthrough of the facility, it was observed that the physical appearance of employees on work floors does not indicate employment of underage persons.
5. No child labor or adolescent employee was detected at this time.
6. The facility has a child labor policy which is displayed on the notice board.
7. The company has a documented policy to not to employ child labour or young labour and relevant procedures.
8. The Policy of the company against child and young labour had been communicated to the employees by displaying the same in the notice board.

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

1. Child labor policy and procedures
2. Personal files
3. Worker interview
4. 10 personal files, including that of interviewed employees, were reviewed for age proof and found all

sampled files maintained with valid age proof documents. As per the age proof documents, the youngest employee at the facility is 21 years old.

Any other comments: Nil

A: Legal age of employment	15 Years completed
B: Age of youngest worker found:	21 Years completed
C: Children present on workforce but not working at 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: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Y give details

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed: Not Applicable
(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

5: Living Wages are Paid

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Applicable minimum wages paid to all the employees. Wage slips are being issued to all employees.
2. Written employment contract had been issued to all employees, in local language, wherein all information about their employment conditions in respect of wages and other employment conditions.
3. Deductions are made from the wages of workers towards statutory Social Security Benefits viz., Employee Provident Fund and Employee's State Insurance.
4. No deductions are made from the wages of the workers as a disciplinary measure.
5. Wages are paid in time, on or before 7th day of every month for all employees.
6. The facility falls under the classification of Hosiery Manufactory as notified by the Government of Tamil Nadu. As per the wages prescribed for the Hosiery the daily rate of minimum wage to be paid is INR 279 for Cutter, Ironer, Packer and Tailor, INR- 205 for checker, INR192 for Helper. The wages are applicable with the effect from April 01, 2017.
7. The daily rate wages being paid by the facility is Cutter, Tailor, Ironer and Packers- INR 280 per day, Checker- INR 210 per day and Helpers- INR 200 per day.
8. The company has a documented system to comply with applicable laws to ensure that the wages paid are in conformance to the standard and applicable local laws.
9. The company had established Policy and Procedures to ensure that the wages paid to the employees always be enough to meet basic needs and to provide some discretionary income.

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

1. Worker interview
2. Local and national laws
3. Wages and benefits policy
4. Local legal minimum wage documents
5. Payroll records and working time records
6. Leave records
7. Records and receipts related to Social Security Contribution.
8. Labour contracts

Any other comments: Nil

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed:

(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 48 Hours per week	45 Hours per week	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day, 12 hours per week and 50 hours per quarter.	No Overtime was performed on all selected pay periods.	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
D: 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: INR 24 / hour INR 192/ day INR 1152 / week INR 4992/ month	INR 25 / hour INR 200/ day INR 1200 / week INR 5200/ month	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
E: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of normal rate of wages	No Overtime was performed on all selected pay periods. However factory has the policy to compensate the overtime hours at 200% of normal rate of wages	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A

Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: If No , why not?		
C: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	26 samples from August 2017, April 2017 and January 2017	
D: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If Yes , please give details: INR 279 for Cutter, Ironer, Packer and Tailor, INR- 205 for checker, INR192 for Helper.
E: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If No , please give details: Cutter, Tailor, Ironer and Packers- INR 280 per day, Checker- INR 210 per day and Helpers- INR 200 per day.
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: <i>Note: full time employees and please state hour / week / month etc.</i>	Please indicate the breakdown of workforce per earnings:
	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	____% of workforce earning under min wage ____% of workforce earning min wage __100__% of workforce earning above min wage
G: Bonus (amount specify)	Bonus Scheme found: Review of records show that yearly bonus at the rate of 8.33% (Legal Minimum) of the gross wages earned during the preceding year had been paid to all eligible employees.	
H: What deductions are required by law e.g. social insurance? Please state all types:	Deductions are required to be made for Statutory Social Security Benefits viz., Employee Provident Fund, Employee's State Insurance and Tamilnadu Labour Welfare Fund.	

I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please describe : All Legal deductions.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Bio-metric was found to be maintained for recording the In and Out timings of all employees. A separate Attendance/Wage register was found to be maintained for all employees to record attendance, based on Bio-metric entries. Separate wages slips had been issued to all employees towards acknowledgement of receipt of wages.
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <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 Details:
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 Please specify amount/time:
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: Living Wage had not been calculated.
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 Details: The Local Government revises the minimum wages for Employment in Tailoring Manufactory annually, considering the Consumer Price Index of the previous year.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details:
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other explain:

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The company maintain manual time records with workers acknowledging their time of in & out
2. The company had displayed the working hour's policy at main notice board.
3. Review of documents and workers interview, show that no overtime had been carried out in the Company.
4. The facility work in single shift and the shift timing is from 08.30 A.M to 05.30 P.M, including 60 minutes break
5. Regular hours are 48 hrs/week.
6. All employees receive at least one day off in every seven day period.

7. The working hours are displayed on the notice board.
8. Overtime, if provided, is on voluntary basis which has been mentioned in the appointment order issued to the workers and in the policies of the factory.
9. No overtime was performed on all selected pay periods.
10. The company has a documented Policy and Procedures to comply with applicable laws to ensure that the maximum normal working hours does not exceed 48 Hours in a week.

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

1. Payroll and time cards for the months of August 2017, April 2017 and January 2017 (26 samples each) were verified.
 2. Working hour's policy
 3. Leave records
 4. Workers Interview
 5. Policy and Procedures
- Any other comments: Nil

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed: Not Applicable

(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

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Working hours' analysis <i>Please include time e.g. hour/week/month</i> (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Bio-metric				
B: Is sample size same as in wages section	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If N, please give details</i>				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.</i> Details			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>If YES, please complete as appropriate:</i>			
		<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	<i>If Y please %detail hours, % and types of workers &affected and frequency</i> Details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	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:		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):				

Standard/Contracted Hours worked		
G: Standard working hours over 48 per week found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency
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	<i>If YES, please give details</i>
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	No overtime hours were found to be engaged during the sampled periods of work.
J: Combined hours (standard/contracted plus= total) 60 found?	<input type="checkbox"/> Yes <input type="checkbox"/> No - N/A- No overtime hours were found to be engaged during the sampled periods of work.	
K: Approximate percentage of total workers on highest overtime hours	_____ % N/A- No overtime hours were found to be engaged during the sampled periods of work..	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:</i>
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - No overtime hours were found to be engaged during the sampled periods of work.	<i>Please give details of normal day overtime premium as a % of standard wages:</i> N/A- No overtime hours were found to be engaged during the sampled periods of work.
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>If yes, please describe % of workers & frequency:</i>

		N/A- No overtime hours were found to be engaged during the sampled periods of work.
<p>O: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (<i>May be standard wages above minimum legal wage, with no/low overtime premium</i>) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	Please explain any checked boxes above e.g. detail of consolidated pay CBA or Other	
	N/A- No overtime hours were found to be engaged during the sampled periods of work.	
<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. Multi select is possible.</p>	<input checked="" type="checkbox"/> Overtime is voluntary <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)	
	Please explain any checked boxes above	
	N/A- No overtime hours were found to be engaged during the sampled periods of work.	
<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 If yes, please describe	
<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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility had established an Urgent Business Needs Policy under which overtime can be engaged on special occasions of Urgent Business Needs. The overtime hours that might be engaged had also been declared as voluntary.	

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The company had displayed Anti-discrimination policy on the notice board and well explained to all employees.
2. Workers are provided employment and remuneration based on their competency and job requirements and also promotion & training opportunity is based on the workers willingness and competency.
3. The company's intent of non - discrimination had been adequately communicated to the workers when they are recruited. As per the workers interview; discrimination is not being practiced in the company.
4. The company had established a recruitment procedure and had communicated the same to all employees through its notice board.
5. The company had expressed its commitment to avoid any kind of discrimination, in accordance with the ETI requirement and the laws in force.
6. The organization had defined its policy regarding discrimination.
7. The organization had committed itself to not to practice discrimination at hiring new personnel, remuneration, the access to training, promotion, retirement- on criteria such as: sex, sexual orientation, age, colour,

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

1. It was noted from interview with the employees and review of records that employees are not discriminated in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation.
2. Anti-discrimination policy
3. Recruitment procedure
4. Attendance records
5. Termination records
6. Training records

Any other comments: Nil

A: Gender breakdown of Management + Supervisors <i>(Include as one combined group)</i>	Male: __53__ % Female __47__ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst	No such skilled or technical roles had been engaged.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement No evidence of discrimination was found.

Professional Development

A: What type of training and development are available for workers?	Please give details : All employees had been provided with periodical trainings on Health & Safety and ETI requirements. The last H&S Trainings had been held on 22.08.2017 The last ETI Awareness trainings had been held on 31.08.2017.
B: Are HR decisions on 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: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed: Not Applicable

(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

8: Regular Employment Is Provided

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ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The company had undertaken to ensure that all employees perform their work on the basis of an employment contract.
2. The recruitment policy and procedure of the company on this regard was available and had been communicated to the employees.
3. It was noted that there is no temporary workers had been employed in the company.
4. It was also noted that home workers or apprentices are also not being engaged in the production.

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

1. The hiring and termination practices
2. Personal files
3. Appointment order.
4. Payroll records.

5. Time Cards

6. Interaction with the production supervisors and interview of employees.

Any other comments: nil

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed: Not Applicable
(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence Observed: 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 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 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
C: If any checked, give details:	N/A

Migrant Workers:

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

A: Type of work undertaken by migrant workers:	Not applicable. Migrant workers had not been engaged	
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used Not applicable. Migrant workers had not been engaged	
C: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:	Observations Not applicable. Migrant workers had not been engaged.
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes number and example of roles Not applicable. Migrant workers had not been engaged.	

NON-EMPLOYEE WORKERS

Recruitment Fees:

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

C: If any checked, give details:	N/A
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Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	Agencies are not being used. And names if available:
B: Were agency workers' age/pay/hours included within scope of this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable Details
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Not applicable

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 Please describe finding: If Y, how many contractors are present No contract employees were found.
B: If Yes , how many workers supplied by contractors	N/A
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: N/A
D: If Yes , please give evidence for contractor workers being paid per law:	N/A

8A: Sub-Contracting and Homeworking

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

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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:

1. Procedures are in place to manage the suppliers involved in incidental processes of the company.
2. The company's main processes like Fabric cutting, Sewing, Checking, Ironing and Packing are done in-house.
3. Through interview with the management and employees, incidental processes like Knitting, Dyeing, Embroidery, Printing, Compacting and Accessories are outsourced

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

1. Production records
2. Interactions with Management
3. Interactions with Production Staff
4. Goods/ Vehicle movement registers

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

Process Subcontracted	Knitting	Dyeing
Name of factory	RBR Garments p Ltd Knitting Division	RBR Garments p Ltd Dyeing Division
Address	Tirupur	Tirupur

Process Subcontracted	Compacting	Printing
Name of factory	BBC Knits	Ayyappa Off-sets
Address	Tirupur	Tirupur

Process Subcontracted	Accessories
Name of factory	Kumaran papers
Address	Tirupur

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed: Not Applicable

(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

Summary of sub-contracting – if applicable

☐ Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours or undeclared sub-contracting

- ☒ Yes
☐ No

Please describe:

Incidental processes like Knitting, Dyeing, Compacting, Printing, Embroidery and Accessories are outsourced.

B: If sub-contractors are used, is there evidence this has been agreed with the main client?

- ☒ Yes
☐ No

If Yes, summarise details:

	Company has obtained commitment letter from them.
C: Number of sub-contractors/agents used	05
D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details: The company had established a supplier control policy and procedure.
E: What checks are in place to ensure no child labour is being used and work is safe?	The factory had established a sub-contractor control plan and sub-contractors who come under the sphere of influence of the factory had been communicated on the requirements of the standard and letter of commitment had been obtained from such sub-contractors.

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

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: There is open-door policy and suggestion box system in the factory. Additionally all employees have right to report to any violation to The Labor commissioner and Director for Industrial Health and Safety.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Yes, all workers aware of the internal and external channels. Company has displayed the concern contract number on notice board and they can easily ask anything or complaint anything if something wrong.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Open-door policy, suggestion boxes</p>
<p>D: Is there a grievance mechanism in place for:</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other Details: Open-door policy, suggestion boxes</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details</p>
<p>F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details</p>
<p>G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms (e.g.,</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No Please give details</p>

help lines or whistle blowing mechanism	
H: Is there a published and transparent disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No please explain
I: If yes, are workers aware of these the disciplinary procedure	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no please give details
J: 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 If Yes please give details

Current Systems and Evidence Examined

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

Current systems:

1. From interview with the employees, there was no evidence of harsh or inhumane treatment of employees.
2. All workers are treated with respect and dignity.
3. The company's disciplinary policies had been explained to all employees and all employees were well aware about their rights of grievance redress procedure
4. The Internal Complaints Committee for Women (Anti Sexual Harassment Committee) and Grievance Handling Committee meet at regular intervals to attend and address incidents of discrimination/ grievances.
5. Abuse of any nature; be it verbal or physical was not reported by the workers during the interview.
6. All the interviewed workers stated that they enjoy cordial relations with their supervisor and management and find themselves free to confront them with an issue for discussion.
7. The facility had framed Certified Standing Orders (Work Rules and Conditions), which prohibit physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation to all the employees.

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

1. Policy on prevention of harassment and abuse
2. Grievance handling procedure documentation.
3. Grievance Register
4. Training records
5. The Certified Standing Orders (Work Rules and Conditions) of the company

Any other comments: Nil

Non-compliance: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

(where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The company has established a recruitment policy and related procedures to ensure that only workers with a legal right are employed.
2. Company had not employed any foreign nationals.
3. The recruitment policy of the company does not prefer engagement of foreign nationals.

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

1. Personal files of 26 employees were reviewed.
2. Recruitment Policy and Procedures

Any other comments: Nil

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence

observed: Not Applicable

(where relevant please add photo numbers)

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

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

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

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

1. The company had undertaken to comply with the local and international laws and regulations and also their end client's environmental requirements through its Environmental Policy.
2. The company was found to be aware of the end client's environmental requirements and is committed to comply with the same.
3. There are no hazardous operations involved in the manufacturing process of the company.

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

1. On site observation
2. Environmental Policy
3. Ambient Air Quality, Illumination, Noise and Stack Monitoring Reports.

Any other comments: Nil

Non-compliance: None Observed

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 requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence

observed: Not Applicable
 (where relevant please add photo numbers)

Observation: None Observed

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence

observed: Not Applicable

Good examples observed: None Observed

Description of Good Example (GE): None Observed

Objective Evidence

Observed: Not Applicable

Appendix 1

<p>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."</p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of</p>	

<p>management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
ETI 1. Forced Labour	ETI 1. Forced Labour
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p> <p>3.4 Accommodation, where provided, shall be</p>	

<p>clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>6.3 All overtime shall be voluntary. Overtime shall</p>	

<p>be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – 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. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such</p>	

<p>obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
<p>Additional Elements</p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
10. Other issue areas 10B2: Environment 2-Pillar	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p>B.4. Compliance Requirements</p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p>B4. Guidance for Observations</p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

10C. Compliance Requirements

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

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

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

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

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

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







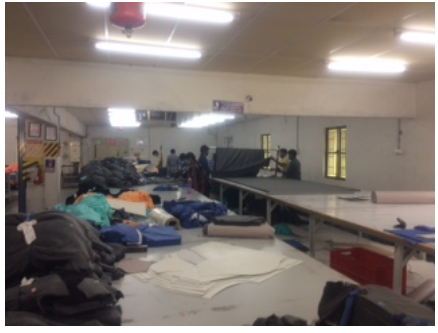





10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

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

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

Photo Form

		
Name Board of the facility	Front view of the Facility	No Child Labour Board Displayed
		
Security Area	Overall View of the facility	Salary day Instructions
		
Cutting Department	Sewing Department	Checking Department
		
Ironing Department	Packing Department	Hydrant System

Fire alarm point displayed	Safety Instruction Displayed	First Aid Box
Portable Sprinkler System	Drinking Water Point	Push-Bar type Emergency Exit Door
Abstract of Laws Displayed	Various Policies Displayed	Inside View of Female Accommodation
Trained Persons details displayed in Female Accommodation	Fire Extinguisher and First Aid box	Washing Area

		
Washing Area	Toilet Block	Front View of Room

Disclaimer:

'This report provides a summary of the findings and other applicable information found/gathered during the audit conducted at the specified facilities on the specified date only. Therefore, this report does not cover, and Rina accepts no responsibility for, other locations that may be used in the supply chain of the relevant product or service. Further, as the audit process used by Rina is a sampling exercise only, Rina accepts no responsibility for any noncompliant issues that may be revealed relating to the operations of the identified facility at any other date. Rina assumes no liability to any party, for any loss, expense or damage occasioned by the use of this information.'

End of the report



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

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[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)

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