




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1057693	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1024936
Business name (Company name):	Apex Lingerie Limited		
Site name:	Apex Lingerie Limited		
Site address: <i>(Please include full address)</i>	Chandora, Shafipur, Kaliakoir, Gazipur.	Country:	Bangladesh
Site contact and job title:	Mr. Md. Harun Or Rashid- A.G.M (Compliance).		
Site phone:	+8801787668185	Site e-mail:	compliance@apexholdings.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	26 th & 27 th December 2021		

Audit Company Name & Logo:  SGS Bangladesh Limited	Report Owner (payer): Apex Lingerie Limited
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None

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

Lead auditor: Imran Ahmed APSCA number: RA 21701483

Lead auditor APSCA status: RA (In Good Standing)

Team auditor: Md. Kamruzzaman Sarker and Taslima Rahman Tafsin

APSCA number: RA 21701411 & RA 21703754

Interviewers: Imran Ahmed, Md. Kamruzzaman Sarker and Taslima Rahman Tafsin

APSCA number: RA 21701483, RA 21701411 & RA 21703754

Report writer: Md. Kamruzzaman Sarker

Report reviewer: Ananya Mallick

Date of declaration: 27th December 2021.

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	03			NC: 1. PPE not used by the workers. 2. Machine safety guards were displaced 3. MSDS, labelling & secondary containment was missing.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
5. Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			03	Good Example: 1. Factory management provides attendance bonus BDT 600 per month to all workers. 2. Facility provides medical facility for the workers and their family member.

									3. Factory provides transport facility for their workers at free of cost.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed
10B2	<u>Environment 2-Pillar</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01			NC: 1. Wastewater test not conduct periodically.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not Applicable

General observations and summary of the site:

1. Factory has a policy to endorse at the highest level, covering human rights impacts and issues, and ensures it is communicated to all employees.
2. Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labour was observed. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files.
3. Facility does not engage any forced or bonded labour. In Bangladesh, no prison labour is engaged outside the prison according to the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.

4. Factory treats their workers with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse is practised.
5. Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents verification and nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.
6. One registered Trade Union (Registration number: Dhaka-3275) found in the facility. Trade union name "Apex Holdings (Garments) Ltd. Sromic and Karmachari Union" has been formed by the workers of the factory by election. This trade union look after the audited factory and other four sister concerned factory. Workers are free to join or form the trade union, no restriction has been imposed to the workers from the management. Nothing identified through policy verification. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any. Regular meeting was held between management and trade union members.
7. First aid facility and toilet facilities have been found as per legal requirement. First aiders were well known about the first aid issues.
8. The factory implemented anti-harsh or inhumane treatment policy. The policy states that physical abuse or threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse happened in the factory.
9. Facility has designated different person to look after different sections in the factory. As a senior management Mr. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for ETI Base code, Human Resource management & Human Rights.
10. Following measure has been taken by the facility during operation in every day to protect their employees from Corona Virus (Covid-19).
- Checking temperature for each employee while entering in the morning.
 - Arrange and ensuring hand washing facility for each employee by sufficient washing point when entering in the factory.
 - Ensuring face mask for each employee.
 - Maintained same arrangement for visitors.

**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:	Apex Lingerie Limited							
B: Site name:	Apex Lingerie Limited							
C: GPS location: (If available)	GPS Address:	Latitude: 24.03036721 Longitude: 90.2636623						
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Trade Licence No: License no. 56817, issued by Kaliakoir Pourashava, Gazipur and valid till 30th June 2022.</p> <p>Factory Licence No: Licence no. 10520/Gazipur, issued by Deputy Chief Inspector of Factories and valid till 30th June 2022.</p> <p>Fire Licence No: DD/Dhaka/12583/2000 issued by Bangladesh Fire Service & Civil Defence Authority and expiry date is 30th June 2022.</p>							
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kinds of lingerie knit items							
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Apex Lingerie Limited is located at Chandora, Shafipur, Kaliakoir, Gazipur, Bangladesh. The factory incorporation was certified on 8th July 1998. The total Production area is about 228246 Square feet, land area is about 571986 square feet and warehouse is about 10000 Square Feet.</p> <p>There are 04 factories in the premises including three sister concerns namely:</p> <ol style="list-style-type: none"> 1) Apex Lingerie Limited, (audited factory) 2) Apex Spinning & Knitting Mills Limited (not under audit scope) 3) Apex Yarn Dyeing Limited (not under audit scope) 4) Apex Textile Printing Mills Limited (not under audit scope) <p>There are 13 buildings and 12 sheds including WTP within factory premises Combinedly use by 04 factories and ETP is located outside (nearby) factory premises. Details are given below:</p> <table border="1" data-bbox="699 1727 1437 1993"> <thead> <tr> <th>Production Building 01: (06 storied)</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor:</td> <td>Fabric Inspection area, fabric store, Elastane Warper section and moulding section,</td> <td>Audited factory</td> </tr> </tbody> </table>		Production Building 01: (06 storied)	Description	Remark, if any	Ground floor:	Fabric Inspection area, fabric store, Elastane Warper section and moulding section,	Audited factory
Production Building 01: (06 storied)	Description	Remark, if any						
Ground floor:	Fabric Inspection area, fabric store, Elastane Warper section and moulding section,	Audited factory						

	Office area, chemical sub-store area.	
1 st floor:	Sample section, CAD, Cutting section, Accessories store, Soldering section.	Audited factory
2 nd floor:	Sewing section & Washroom area.	Audited factory
3 rd floor:	Finishing section, packing section, Hook & Eye area, Piping area, Spot removing room, Sub-store, Inspection room, Maintenance room, Training room, Moisture room, accessories store.	Audited factory
4 th floor:	Sewing section, Training room, Accessories Store.	Audited factory
5 th floor:	Sewing section, Officer room & Accessories store.	Audited factory
Roof top:	100% Vacant	NA
Is this a shared building?	No	NA

Building no 02	Description	Remark, if any
Ground floor:	Childcare room, Medical centre	Combinedly used by 04 factory
1 st floor to 2 nd floor:	Top management rest room.	Combinedly used by 04 factory
Roof top	100% vacant	NA
Is this a shared building?	Yes	Combinedly used by 04 factory

Building no: 3	Description	Remark, if any
Basement:	Fire Pump	Combinedly used by 04 factory
Ground floor:	Fire Control Room	Combinedly used by 04 factory

Rooftop:	100% Vacant	NA
Is this a shared building?	Yes	Combinedly used by 04 factory
Building no: 4	Description	Remark, if any
Ground Floor	Security Post	Combinedly used by 04 factory
Is this a shared building?	Yes	Combinedly used by 04 factory
Building no: 5 (prefabricated still structure building)	Description	Remark, if any
Ground floor:	Workers Dining hall	Combinedly used by 04 factory
1 st floor:	Workers Dining hall	Combinedly used by 04 factory
Is this a shared building?	Yes	Combinedly used by 04 factory
Building no: 6	Description	Remark, if any
Ground floor to 3 rd floor:	Mosque	Combinedly used by 04 factory
Is this a shared building?	Yes	NA
Building no: 7	Description	Remark, if any
Ground floor	Trade Union Office	NA
Is this a shared building?	No	NA
Building no: 8	Description	Remark, if any
Ground Floor	Compressor	Combinedly used by 04 factory
Is this a shared building?	Yes	Combinedly used by 04 factory

Building no: 9	Description	Remark, if any
Ground floor to 2 nd floor and 4 th floor to 6 th floor:	Apex Textiles Printing Mills Ltd	(Same owner and same management)
3 rd floor:	Finished goods store	(Used by Apex Lingerie limited)
Roof top	100% vacant	NA
Is this a shared building?	Yes	Combinedly use with Apex Textiles Printing Mills Ltd

Building 10:	Description	Remark, if any
Ground floor:	DAF area	Combinedly used by 04 factory
1 st floor:	Lab, chemical room, compressor room, chemical dosing room	Combinedly used by 04 factory
Is this a shared building?	Yes	Combinedly used by 04 factory

Shed 1:	Description	Remark, if any
Ground floor:	Warp section, knitting Narrow Dyeing Fabric section	Audited Factory
Mezzanine floor:	Office	Audited Factory
Is this a shared building?	No	NA

Shed 2:	Security Rest Room & kitchen.	Combinedly used by 04 factory
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Shed 3:	Waste Keeping Room	Combinedly used by 04 factory
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Shed 4:	Security, Driver Rest Room & kitchen.	Combinedly used by 04
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		factory
Shed 5:	Workshop	Combinedly used by 04 factory
Shed 6:	Boiler	Combinedly used by 04 factory
Shed 7:	Generator	Combinedly used by 04 factory
Shed 8:	Canteen	Combinedly used by 04 factory
Shed 9:	CCTV room Monitoring	Combinedly used by 04 factory

WTP (water treatment plant)

There is a ETP which is located at outside of factory premises- Combinedly used by 04 factory

Building details of others facility within factory premises:

Building-11- 04 storied building use by Apex Spinning & Knitting Mills Limited

Building-12- 03 storied building use by Apex Spinning & Knitting Mills Limited

Building-13- 10 storied office & Store building use by Apex Textile Printing Mills Limited

Winding shed-10- use by Apex Yarn dyeing Limited

Dyeing shed-11- use by Apex Yarn dyeing Limited

Dyeing Shed-12- Apex Spinning & Knitting Mills Limited

Total production capacity is 1800000 pieces lingerie items per month. Currently 3937 employees are working in the facility. Out of 3937 employees, 1259 are male and 2678 are female.

In general, the employees work for 6 days in a week (Saturday to Thursday). Friday is weekly holiday. General working hour is 07:45 am to 04:45 pm including 1-hour lunch break from 12:45 pm to 01:45 pm. Narrow fabric dyeing & warp knitting section

	<p>have 3 shifts start from 06:00 am to 02:00 pm, 02:00 pm to 10:00 pm, 10:00 pm to 06:00 am including 1-hour comfortable meal break. Moulding section has 2 shifts start from 06:00 am to 02:00 pm, 02:00 pm to 10:00 pm including 1-hour comfortable meal break.</p> <p>Facility is paying monthly salary 100% by mobile banking (Rocket) to all the employees. The facility's wage period is 1st – 30th /31st of the month for all the employees except Warp knitting, sample and admin section (payment circle 26th to 25th in between two month for Warp knitting, sample and admin section).</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported as a result of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Building construction plan was taken from Kaliakoir Municipality, Gazipur on 20.05.2015. Floor Layout approval taken for all floor of the facility from Chief Inspector Factory labour department on 17th July 2015.</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Round the year same production.</p>
<p>I: Process overview:</p>	<p>Product: All kinds of lingerie knit items</p>

<p>(Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Process: Warping->Warp knitting ->Narrow fabric dyeing->Cutting->Moulding->Sewing →Finishing (Iron to Packing).</p> <p>Line: 66 sewing lines</p> <p>Equipment: Back Tape, Bar Tack, Bra Buckle Sewing Machine, Button Hole, Button Stitch, C/B-Over Lock With Elastic Cutter, Feed Of The Arm, Flat Lock, Multi Needle, Over Lock, Picot, Scallop, Single Needle, Turn Down Stitch O/L, Two Needle, Velco Attach, Zig Zag, Band Knife, Fusing, Heat Press, Cutter Machine, Warp Knitting Machine, Warping Machine, Narrow Fabric Dyeing Machine, Boiler, Generator and Compressor Etc.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (name): Apex Holdings (Garments) Ltd. Sromic and Karmachari Union</p> <p><input type="checkbox"/> Worker Committee</p> <p><input type="checkbox"/> Other (specify)</p> <p><input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>L1: If yes, approx. % of workers in on site accommodation</p> <p>Not applicable as there is no legal requirements.</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>M1: If yes, approx. % of workers</p> <p>Not applicable as there is no legal requirements.</p>
<p>N: Were all site-provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>N1: If no, please give details:</p> <p>Not applicable as there is no legal requirements.</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9:15 am Day 1 Time out: 5:45 pm	Day 2 Time in: 10:00 am Day 2 Time out: 6:15 pm	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	03 Auditors used in 1st day. 02 Auditors used in 2 nd day.		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 04 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Md. Harun Or Rashid- A.G.M (Compliance).		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	7 th & 8 th February 2021.		
J: Previous audit type:	Periodic Audit		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

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

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not applicable as Union representative was present during the audit.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	Not applicable		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	1259 (including management)	0	0	0	0	0	0	1259 (including management)
Worker numbers – female	2678 (including management)	0	0	0	0	0	0	2678 (including management)
Total	3937 (including management)	0	0	0	0	0	0	3937 (including management)
Number of Workers interviewed – male	25	0	0	0	0	0	0	25
Number of Workers interviewed – female	50	0	0	0	0	0	0	50
Total – interviewed sample size	75	0	0	0	0	0	0	75

A: Nationality of Management	Bangladeshi	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: ___ Bangladeshi ___ B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: All workers listed from different section and different pay period.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 ___100%___ C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration <i>(management information)</i>	<p>D: _____% workers on piece rate D1: _____% hourly paid workers D2: ___100___% salaried workers</p> <p>Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: ___100___% monthly paid D6: _____% other D7: If other, please give details</p>	

Worker Interview Summary

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>	45 employees (9 groups of 5 employees)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 10 D2: Female: 20
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No issue was identified during workers interview.
I: What did the workers like the most about working at this site?	1. Attendance Bonus. 2. Transport facility at free of cost. 3. medical facility for the workers family member.
J: Any additional comment(s) regarding interviews:	None.
K: Attitude of workers to hours worked:	Comfortable.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	

M: Attitude of workers:

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

Total 75 employees selected for interview. Among them 30 employees were selected for individual interview and total 45 employees in 9 groups (5 employees in each group) were selected for the group interview. All the interviewees were favourable with the management. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They can complain directly to their supervisors or line manager and felt free to give their general concerns to their Union representatives who would take it to the meeting.

N: Attitude of worker's committee/union reps:

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

Trade union member was comfortable with management, workplace and interview process. During opening meeting Trade union member was present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. In the period of interview, workers' representatives discussed their feelings to the auditors without any hesitation and confusion.

O: Attitude of managers:

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

Management of the factory was positive and supportive during the whole audit. Mr. Md. Harun Or Rashid-A.G.M (Compliance) is the key person of the compliance team and for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope; e.g. ETI Base Code, local laws etc. The factory management was found to be cooperative throughout the audit.

Audit Results by Clause

0A: Universal Rights covering UNGP

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Factory implements and maintains systems for delivering compliance to this Code.
2. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for compliance with human rights.

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

Details:

1. Facility Management Interview.
2. Document review.
3. Workers Interview.

Any other comments:

Nil

A: Policy statement that expresses commitment to respect human rights?

- Yes
 No

A1: Please give details:

	Factory has policy which authorized at the highest level human rights impacts and issues, and ensure it is communicated to all workers.
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: Md. Harun Or Rashid Job title: A.G.M (Compliance)
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: There is a procedure on employee data protection. All employee's information and personnel files are kept in confidential way and locked away in the human resources department and it is only viewed by the concerned department.

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

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

Measuring Workplace Impact

Measuring Workplace Impact Table

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 __2.5__ %	A2: This year: 2021 __2__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2.5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 __4__ %	C2: This year 2021 __4.5__ %
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	2.9%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Factory used prescribed format of Accident register for recording accidents/injuries, noted through documents review. Moreover, reflection of injury analysis and root cause for corrective action was found.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2020 Number: 5%	F2: This year:2021 Number: 7%
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]	3.9%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 2%	H2: This year: 2021 2%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers
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0: Management systems and Code Implementation

0B: Management system and Code Implementation
[\(Click here to return to summary of findings\)](#)

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

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

Current systems:

- The factory communicates their code of conduct through training program and notice board regularly include company's own COC.
- Md. Harun Or Rashid- A.G.M (Compliance) is responsible for compliance with the Code.
- Facility communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.

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

Details:

- Document review (Policy record review and training register review).
- Facility Management Interview.
- Workers Interview.
- Plant tour

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 A1: Please give details:
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	Site has not been subjected to any fines in the last 12 months noted through management interview.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: There is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The facility communicated the policy and procedures on risk of forced labour, child labour, discrimination and harassment & abuse with the workers through training program and posted those policies in the notice board. No complaint found from interviewed workers too.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse. Last mid-level (management including workers) training was held on 24 th November, 2021 with 37 participants.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse and factory preserved training records as evidence. During interview with workers and mid-level management staff were found aware about the policies and procedures.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility has conducted amfori BSCI on 16 th November 2021 and ISO 45001:2018 Valid till December 2022.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has an independent Human Resources Department and Md. Harun Or Rashid- A.G.M (Compliance) is responsible for this department.

H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Md. Harun Or Rashid-A.G.M (Compliance) is responsible for implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Factory has the policy to ensure all worker information confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: There is effective policy and procedures found to ensure confidential information is kept confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Facility has system to address issues if any irregularities found during risk assessment.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility management communicates this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The land area is owned by its management. The site has all required land rights permissions.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p>P1: If yes, how does the company obtain FPIC: Facility has a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: NA</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: NA</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No S1: Please give details: NA</p>

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

<p style="text-align: center;">Observation:</p>	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments: None Observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

<p style="text-align: center;">Good Examples observed:</p>	
<p>Description of Good Example (GE):</p> <p>None Observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

1: Employment is Freely Chosen

<p>1: Freely Chosen Employment (Click here to return to summary of findings)</p>
<p>ETI</p> <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>

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. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for this section of freely chosen employment.
2. The facility has a policy which prohibits forced labour, and this was also available for review.
3. Facility does not hold main copy of any legal document of the workers during recruitment. The factory maintains only photocopies of all hiring documents such application, date of birth certificates, school certificates etc.
4. The workers are free to leave the work place If workers want to leave their job, they are free to do so, if they are fulfilled their obligations agreed under their appointment letter/agreement.
5. Factory displayed overtime policy which stating that over time work is voluntary.

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

Details:

1. Facility Management Interview.
2. Document review (Recruitment policy, working hour policy, workers' personal file, copy of national ID, date of birth certificates, school certificates, security guard's job description etc.).
3. Workers Interview.

Any other comments: Nil.

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Workers can terminate their job any time as per local regulations.</p>

E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Employees are free to leave at the end of workday noted through workers interview.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has policy & procedure on force labour, bonded labour and they understand the risk also communicate with their supply chain.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: forced/trafficked labour policy which maintained by the facility to reduce risk.

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

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

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

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

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

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

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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. Workers can raise their concerns through trade union members, hot line number, complaint box, meeting and their team leader or above.
- 2. Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as trade union members also.
- 3. Factory has a policy where is no restriction imposed to the workers' formation of trade union.
- 4. Factory has one registered trade union (Registration number-Dhaka 3275) was found in the facility.
- 5. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for freedom of association and collective bargaining agreement.

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

Details:

- 1. Facility management interview.
- 2. Worker interview.
- 3. Complaint box register (Suggestions from the complaint box and actions taken).
- 4. Trade Union formation record review and Trade Union meeting records review.
- 5. Grievance handling policy & procedure.

Any other comments:

Nil

<p>A: What form of worker representation/union is there on site?</p>	<p><input checked="" type="checkbox"/> Union (name): Apex Holdings (Garments) Ltd. Sromic and Karmachari Union <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None</p>	
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and workers representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labor Law 2006)</p>	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and workers representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labor Law 2006)</p>	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has formed safety committee. (Workers 6 & management 6) total 12. D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Factory provide adequate facility to conduct regular meeting. Trade union meeting held as per local law on regular basis. Last meeting was held on 09.12.2021.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>One registered Trade Union (Registration number: Dhaka-3275) found in the facility. Trade union named "Apex Holdings (Garments) Ltd. Sromic O Karmachari Union"</p>	<p>F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>

	has been formed by the workers of the factory through election. There are total 35 members in the trade union.	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	NA as facility has a trade union.	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All workers aware about who are their representatives.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 23.10.2020
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: 01	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	As per interview with the trade union member & documents review it was noted that the meeting is held regularly. Last meeting held on 09.12.2021. Meeting minutes is communicated through notice board. Topics of last meeting are as follows: 1. Discussed about previous meeting minutes 2. Discussed about health & safety and omicron virus 3. Discussed about disciplinary procedure 4. Discussed about product quality 5. Discussed about grievance and solutions 6. Discussed about fix the next meeting date	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: <u>100</u> % workers covered by Union CBA	M2: <u>0</u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Non-compliance:

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

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

3: Working Conditions are Safe and Hygienic

3: Working Conditions are Safe and Hygienic

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

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. Facility posted the evacuation plans at all work floors, which indicated escape routes and the location of the fire extinguishers.
- 2. Exit signs were found illuminated and emergency lights were installed with IPS back up.
- 3. Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box – 41 & internal first aider was found – 236 persons responsible for first aid box.
- 4. Workers receive regular health & safety training and record found available. Last Health & Safety training was provided on 15th December, 2021.
- 5. Firefighting training provided as per law. Last firefighting training provided on 21st December, 2021.
- 6. First aid, PPE training provides regularly. Last first aid & PPE training provided on 20th December, 2021 & 22nd November, 2021.
- 7. Medical and childcare facility available in the factory.
- 8. Workers toilet segregate male and female, adequate number as per law and wash facility are available. Total no. of male toilets -57 and female toilets- 113.
- 9. The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed. All switches in the electrical control panels have been labelled.
- 10. Factory has regular fire equipment maintenance system.
- 11. Md. Harun Or Rashid- A.G.M (Compliance) is responsible to look after the health and safety issues.

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

Details:

- 1. Plant tour.
- 2. Document review (Training record review, daily machine maintenance register, electrical installation checking register, injury register, fire drill register, fire equipment checking register).
- 3. Facility management interview.
- 4. Workers interview.

Any other comments: Nil

<p>A: Does the facility have general 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 <input type="checkbox"/> No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: All policies included in workers' manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: All structure have required permits noted through documents review.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are provided personal protective equipment where required.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Medical Facility is available for the workers and it meets the local legal requirements. Male and female rooms are segregated with sufficient numbers of beds.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: 1. Factory has medical facility available with fulltime Doctor & Nurse. Doctor. Makfiratul Rahman, Sajjadur Rahman & Urmi Akter and Nurse Ms. Suborna Mondol are responsible for medical centre. 2. Medical room is fully equipped and meets the local legal requirements. 3. Total no. of first aid box – 41 & internal first aider was found- 236 persons responsible for first aid.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Workers transport facility found fit noted through documents review and management interview.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: NA</p>

	Dormitory facility is not provided to the workers and it is not required by law.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Noted through documents review and plant tour that facility has assessed the risk of all health & safety related issue including driving a long shift.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility meets legal obligation of use/disposing natural resource.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility meets its customer requirements for use chemical although facility does not use any banned chemicals.

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Issue file: PPE not used by the workers.</p> <p>Description of non-compliance: Noted through plant tour that Approximate 05% operators of narrow fabric dyeing section were not using hand gloves, respiratory mask and eye goggles during work at ground floor of shed-1.</p> <p>Local law and/or ETI requirement: In accordance with ETI Base Code 3.1 and Bangladesh Labour Rules, 2015; Rule 67 (2).</p> <p>ETI Base Code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Bangladesh Labour Rules, 2015 Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. It is recommended that factory management should ensure the use of PPE with the awareness program for the workers in the required sections.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>1. Plant Tour (NC Picture 1)</p>

Recommended corrective action:

It is recommended that the factory management should ensure the use of PPE by providing awareness training.

Action By: Md. Harun Or Rashid- A.G.M (Compliance)

Time frame: 30 days

2. Description of non-compliance:

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

2. Plant Tour (NC Picture 2)

Issue title: Machine safety guards were displaced.

Description of non-compliance:

Approximate 5% eye guard of overlock machines were found displaced from its own position while working in sewing section at 2nd, 4th & 5th floor of building 1 noted through plant tour.

Local law and/or ETI requirement:

In accordance with ETI base code 3.1 and Bangladesh labour Law 2006, section 63 (1) (d-iii):

ETI base code 3.1:

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

Bangladesh labour Law 2006, section 63 (1) (d-iii):

In every establishment, the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced-(i) every part of an electric generator, - a motor or rotary converter, (ii) every part of transmission machinery, and (iii) every dangerous part of any machinery.

Recommended corrective action:

It is recommended that the factory management should ensure proper placement of machine safety guard by providing awareness training.

Action By: Md. Harun Or Rashid- A.G.M (Compliance)

Time frame: 30 days

3. Description of non-compliance:

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

<p>Issue title: MSDS, labelling & secondary containment was missing.</p> <p>Description of non-compliance: During plant tour, no MSDS, secondary containment and labelling were found for lube oil and diesel drum beside oil tank area.</p> <p>Moreover, diesel drums and lube oil containers were found stored in open space without any protection from weather contact.</p> <p>Local law and/or ETI requirement: In accordance with ETI base code 3.1 and Bangladesh Labour Rules, 2015, Rule: 68 (10):</p> <p>ETI base code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Bangladesh Labour Rules, 2015, Rule: 68 (10): The owner shall place Material Safety Data Sheet (MSDS) of dangerous materials in an easily noticeable place so that the employed worker can be well informed about the possible hazards.</p> <p>Recommended corrective action: It is recommended that the facility management should ensure, MSDS, secondary container and labelling for lube oil and diesel.</p> <p>Action By: Md. Harun Or Rashid- A.G.M (Compliance)</p> <p>Time frame: 60 days</p>	3. Plant Tour (NC Picture 3)
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Observation:	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Recommended corrective action:</p> <p>None Observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

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

	Not applicable
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4: Child Labour Shall Not Be Used

<p>4: Child Labour Shall Not Be Used (Click here to return to summary of findings) (Click here to return to Key Information)</p>
<p>ETI</p>
<p>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.</p>

<p>Current Systems and Evidence Examined</p> <p><i>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.</i></p>
<p>Current systems:</p> <p>The factory establishes a policy which discourages the employment of child labour and no child labour found in the factory during the audit. Factory has strong recruitment process to verify the workers age. 75 sampled workers' personal files were provided for review. In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for compliance with the Code.</p> <p>Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):</p> <p>Details:</p> <ol style="list-style-type: none"> 1. Policy review 2. Document review 3. Management interview 4. Worker interview 5. Factory tour <p>Any other comments: Nil</p>

A: Legal age of employment:	14 years (with some restrictions) as per local law.
B: Age of youngest worker found:	21 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>None Observed</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

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

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

5: Living Wages are paid

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The workers are enjoying benefits such as insurance, annual leave, casual leave, sick leave and maternity leave as per local law. Wages paid within 7 working days after completion of wages month. The facility's wage period is 1st – 30th /31st of the month for all the employees except Warp knitting, sample and admin section (payment circle 26th to 25th in between two month for Warp knitting, sample and admin section). There is no illegal deduction from employees and has been identified through document reviewed and interview with workers. Facility management provides salary through bank directly (Rocket) to the workers. Moreover, facility provides pay slip before salary disbursed to all workers at each month. Md. Harun Or Rashid- A.G.M (Compliance) is responsible to ensure minimum wages in the work place.

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

Details:

1. Document review (wage sheet review, worker's personal file, bonus payment sheet review, maternity register review, wage & benefit policy etc.).
2. Worker interview.
3. Management interview.

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

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

Objective evidence observed:

(where relevant please add photo numbers)

<p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p> <p>None Observed</p>	<p>Not applicable</p>
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Observation:	
<p>Description of observation:</p> <p>Local law or ETI requirement:</p> <p>Comments:</p> <p>None Observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <ol style="list-style-type: none"> 1. Factory management provides attendance bonus BDT 600 per month to all workers. 2. Facility provides medical facility for the workers family member. 3. Factory provides transport facility for their workers at free of cost. 	<p>Objective Evidence Observed:</p> <p>1. Document review, workers and management interview.</p>

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
<p>A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: 8 hours per day and 48 hours per week.</p>	<p>A1: 8 hours/ day 48 hours/ week</p>	<p>A2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>
<p>B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i></p>	<p>Legal maximum: 2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the</p>	<p>B1: Maximum 2 hours/ day and 12 hours per week. (Calculation was done based on the</p>	<p>B2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>

	<p>average 56 (fifty-six) hours per week in any year.</p> <p>Exception for 6 months: Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent.</p> <p>Exception for 06 months: This exemption has been extended several times in last few years and latest extension was on October 27, 2020 and it will be effect from October 17, 2021 to April 16, 2022.</p>	<p>job cards of November , 2021 (current month), and June, 2021 (Random month) and January ,2021 (Random month)</p>	
<p>C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: BDT. 8000 per month (Basic BDT 4100, House rent 50% of the Basic which is BDT.2050, Medical allowance BDT. 600, Conveyance allowance. BDT.350, Food Allowance BDT.900.) For Grade 7 (Assistant operator).</p>	<p>C1: BDT 8000 / month</p>	<p>C2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>
<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 200% of the basic wage rate per hour.</p>	<p>D1: 200% of the basic wage rate per hour.</p>	<p>D2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>

Wages analysis:

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

<p>A: Were accurate records shown at the first request?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>A1: If No, why not?</p>	<p>NA</p>
<p>B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please</p>	<p>75 attendance records and payroll records for the month of November 2021 (Current month)</p> <p>75 attendance records and payroll records for the month of June 2021 (Random month)</p> <p>75 attendance records and payroll records for the month of January 2021 (Random month)</p>

<p>see SMETA Best Practice Guidance and Measurement Criteria)</p>																																																																	
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>C1: If Yes, please give details: The Government has announced the new pay structure which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on 25th November 2018 and amendment was done on 24 January 2019. There are two separate pay structures; for the garment workers (Schedule A), For the stuff (Schedule B).</p> <table border="1" data-bbox="528 613 1584 1317"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk.10938</td> <td>Tk.5469</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 18257</td> </tr> <tr> <td>Grade 2</td> <td>Tk. 9044</td> <td>Tk. 4522</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 15416</td> </tr> <tr> <td>Grade 3</td> <td>Tk. 5330</td> <td>Tk. 2665</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9845</td> </tr> <tr> <td>Grade 4</td> <td>Tk. 4998</td> <td>Tk. 2499</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9347</td> </tr> <tr> <td>Grade 5</td> <td>Tk. 4683</td> <td>Tk. 2342</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8875</td> </tr> <tr> <td>Grade 6</td> <td>Tk. 4380</td> <td>Tk. 2190</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8420</td> </tr> <tr> <td>Grade 7</td> <td>Tk. 4100</td> <td>Tk. 2050</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8000</td> </tr> <tr> <td>Apprentice</td> <td>Tk. 2750</td> <td>Tk. 1375</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 5975</td> </tr> </tbody> </table>	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk.10938	Tk.5469	Tk.600	Tk.350	Tk.900	Tk. 18257	Grade 2	Tk. 9044	Tk. 4522	Tk.600	Tk.350	Tk.900	Tk. 15416	Grade 3	Tk. 5330	Tk. 2665	Tk.600	Tk.350	Tk.900	Tk. 9845	Grade 4	Tk. 4998	Tk. 2499	Tk.600	Tk.350	Tk.900	Tk. 9347	Grade 5	Tk. 4683	Tk. 2342	Tk.600	Tk.350	Tk.900	Tk. 8875	Grade 6	Tk. 4380	Tk. 2190	Tk.600	Tk.350	Tk.900	Tk. 8420	Grade 7	Tk. 4100	Tk. 2050	Tk.600	Tk.350	Tk.900	Tk. 8000	Apprentice	Tk. 2750	Tk. 1375	Tk.600	Tk.350	Tk.900	Tk. 5975
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<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>D1: If No, please give details:</p>																																																															
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<p><input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above</p>	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BDT 8000 per month</p>																																																															
<p>F: Please indicate the breakdown of</p>	<p>F1: ___% of workforce earning under minimum wage F2: __5.5__% of workforce earning minimum wage</p>																																																																

workforce per earnings:	F3: <u>94.5</u> % of workforce earning above minimum wage	
G: Bonus Scheme found: Please specify details:	<p>Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</p> <p>Factory management provides attendance bonus BDT 600 per month to all workers.</p>	
H: What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.	
I: Have these deductions been made?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p> <p>1. Unauthorized absence 2. Revenue stamp 3. Provident fund 4. Loan on Provident fund</p> <p>Please describe: Facility deduct for unauthorized absence, Provident fund, Loan on Provident fund and revenue stamp only.</p>
		<p>I2: Please list all deductions that have not been made.</p> <p>1. Fines, 2. Housing facility, 3. Advance payments, 4. Loans, 5. Income tax</p> <p>Please describe: Facility does not deduct the above mention factors.</p>
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
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 <p>L1: Please give details: Workers' time record was consistent with provided documents.</p>	
M: Is there a defined living wage:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<p><i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i></p>	<p>M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as Minimum Wages Gazette for Readymade Garments Sector published on 24th January 2019".</p>
<p>M2: If yes, what was the calculation method used.</p>	<p><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: NA</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility management is annually reviewed the wages as per local law. Facility increased minimum 5% on basic wages as increment for workers of all grades annually.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All workers are paid within 7th working days after completion of wages period.</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

6: Working Hours are not Excessive

6: Working Hours are not Excessive

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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. In general, the employees work for 6 days in a week (Saturday to Thursday). Friday is weekly holiday. General working hour is 07:45 am to 04:45 pm including 1-hour lunch break from 12:45 pm to 01:45 pm. Narrow fabric dyeing & warp knitting section have 3 shifts start from 06:00am to 02:00pm, 02:00pm to 10:00 pm, 10:00pm to 06:00am including 1-hour comfortable meal break. Moulding section have 2 shifts start from 06:00am to 02:00pm, 02:00pm to 10:00 pm including 1-hour comfortable meal break.
2. Standard working hours found 48 hours in a week with highest 12 hours OT work.
3. Through employees' interview it was noted that they were aware about voluntary overtime policy.
4. As per the company policy all overtime will be compensated as a premium rate (200%).
5. Facility ensured one day off for every 7 days' period, facility weekly holiday is Friday
6. Casual leave, sick leave, festival leave, maternity leave and annual leave were provided as per Local Law.
7. Md. Harun Or Rashid- A.G.M (Compliance) is responsible to monitor legal limit of working hours in the work place.

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

Details:

1. Employee interview.
2. Payroll records.
3. Job card records.
4. Production records.
5. Working hour and overtime hour policies & procedures etc.
6. Management interview.

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Recommended corrective action:

None Observed.

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable.

Observation:

Description of observation:

Local law or ETI requirement:

Comments:

None Observed.

Objective evidence observed:

Not Applicable.

Good Examples observed:

Description of Good Example (GE):

None Observed.

Objective Evidence Observed:

Not Applicable.

Working hours' analysis

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

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: If yes, please give details: 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. Exception for 06 months: This exemption has been extended several times in last few years and latest extension was on October 27, 2020 and it will be effect from October 17, 2021 to April 16, 2022.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 52 Hours in the month of November 2021 (Current Month) 52 Hours in the Month of June 2021 (Random Month) 52 Hours in the Month of January 2021 (Random Month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___50___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Overtime works found voluntary confirmed through worker interview, contract letter/ employment agreement papers review.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: Facility has a policy to pay 200% of basic (Per/Hour Rate) for overtime work.

<p>N: Is overtime paid at a premium?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency: Workers who work overtime paid as premium rate or 200% of basic wages as hourly rate.</p>
<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
<p>NA</p>		
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<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)	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
<p>NA</p>		
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p>	
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>NA</p>	

7: No Discrimination is practiced

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

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, sex, union membership or political affiliation.
2. No gender discrimination was found in the facility; both female and male employees were distributed in all types of work.
3. The facility provides the same wage amount to male/female employees for the same work.
4. No complaint or records found for pregnancy test.
5. There is no restriction for formation of trade union in the facility.
6. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for ensure no discrimination in work place.

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

Details:

1. Management interview
2. Worker interview
3. Local and national law
4. Personal files
5. Compensation records
6. Termination & retirement records
7. Training records
8. Complain register

Any other comments:

Nil

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>90</u> % A2: Female <u>10</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>Nil</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: NA</p>

Professional Development

<p>A: What type of training and development are available for workers?</p>	<ol style="list-style-type: none"> Workers receive regular health & safety training and record found available. Last Health & Safety training was provided on 15th December, 2021. Firefighting training provided as per law. Last firefighting training provided on 21st December, 2021. First aid, PPE training provides regularly. Last first aid & PPE training provided on 20th December, 2021 & 22nd November, 2021.
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<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If no, please give details:</p>
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Non-compliance:

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

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

8: Regular Employment Is Provided

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. Facility maintains service books for all workers.
2. No home working activity found from the site.
3. All workers are getting identity card after recruitment.
4. Facility maintain age proof documentation for all workers.
5. All workers are provided appointment letter during employment.
6. Md. Harun Or Rashid- A.G.M (Compliance) is responsible to ensure regular employment.

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

Details:

1. Management interview.
2. Worker interview.
3. Local and national law.
4. Workers' personal files and service books.
5. Policies and procedures.
6. Wage sheets.

Any other comments: Nil.

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

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

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

Responsible Recruitment

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>

<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:</p>
<p>C: If yes, check all that apply:</p>	<p><input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: NA</p>
<p>D: If any checked, give details:</p>	<p>NA</p>

<p>Migrant Workers: <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>		
<p>A: Type of work undertaken by migrant workers:</p>	<p>No migrant worker is employed by the factory.</p>	
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used: No migrant worker is employed by the factory.</p>	
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA No migrant workers employed by the factory.</p>	<p>C2: Observations: NA</p>

<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: NA No migrant workers employed by the factory.</p>
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NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
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:	B1 – If other, please give details: NA NA

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: Nil
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA

C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: NA
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: NA

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

8A: Sub-Contracting and Homeworking:

8A: Sub-Contracting and Homeworking

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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:

Noted through document review, factory tour, management interview and employee interview that the facility has no sub-contracting process. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for compliance with the Code.

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

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

<i>Process Subcontracted</i>	<i>Nil</i>	<i>Nil</i>
<i>Name of factory</i>		
<i>Address</i>		

Details:

1. Management Interview
2. Workers Interview
3. Subcontractor documents Review

Non-compliance:

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

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>None observed.</p>	<p>Objective Evidence Observed:</p> <p>Not applicable.</p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please describe: Auditor made a simple calculation to compare capacity with workers' work load.</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>B1: If Yes, summarise details: NA as facility does not need to do any process from outside.</p>
<p>C: Number of sub-contractors/agents used:</p>	<p>Nil</p>

<p>D: Is there a site policy on sub-contracting?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes, summarise details: Facility has detail sub-contracting policy although facility does not do any.</p>
<p>E: What checks are in place to ensure no child labour is being used and work is safe?</p>	<p>NA as facility does not need to do any process from outside.</p>

<p align="center">Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x</p>			
<p>A: If homeworking is being used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes, summarise details: NA</p>		
<p>B: Number of homeworkers</p>	<p>B1: Male: NA</p>	<p>B2: Female: NA</p>	<p>Total: NA</p>
<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>		<p>C1: If through agents, number of agents:</p>
			<p>NA</p>
<p>D: Is there a site policy on homeworking?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>		
<p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p>	<p>NA</p>		
<p>F: What processes are carried out by homeworkers?</p>	<p>NA</p>		
<p>G: Do any contracts exist for homeworkers?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: NA</p>		
<p>H: Are full records of homeworkers available at the site?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>		

9: No Harsh or Inhumane Treatment is allowed

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

ETI

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

Additional elements:

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

<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 A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Factory has communicated this procedure through orientation training confirmed from worker interview.</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>Factory has fixed some complaint boxes in workers' toilet area as well as hotline number available for report of any violation or complaint. No complaint records found regarding physical abuse or harassment.</p>
<p>D: Which of the following groups 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 D1: Please give details: Facility has grievance mechanism system in place for the workers.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>H1: If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>I1: If yes, please give details</p>

Current Systems and Evidence Examined

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

Current systems:

The facility established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory. Factory install complain box in workers toilet area. No complain records found regarding physical abuse or harassment. Md. Harun Or Rashid- A.G.M (Compliance) is responsible for this code.

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

Details:

1. Policy review.
2. Document review.
3. Management interview.
4. Worker interview.
5. Factory tour.

Any other comments:

Nil.

Non-compliance:

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

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

10 A: Entitlement to Work and Immigration

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

It was noted through documents review and workers interview that there are no agency staffs, employment agencies and immigration workers in the factory and Md. Harun Or Rashid- A.G.M (Compliance) is responsible for monitoring these matters.

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

Details:

1. Management interview.
2. Worker interview.
3. Employment records.
4. Appointment letter.
5. Personal files.

Any other comments: Nil.

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

None observed.

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable.

Observation:	
Description of observation: Local law or ETI/Additional Elements requirement: Comments: None observed.	Objective evidence observed: Not Applicable.

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

10 B 2: Environment 2-pillar

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility has an environmental policy which cover all the areas and comply the legal requirement.
2. Factory surrounding environment found acceptable.
3. Factory has waste management policy regarding all kinds of waste management.
4. Facility has conducted air, noise test which found acceptable limit and conducted on 26th May, 2021 by Green Tech Environmental Company.
5. Md. Anwar Hossain-Senior Executive (Environment & Environmental Chemical Responsible) is responsible for factory's environmental issue.
6. Facility has conducted Environmental Impact Assessment (EIA) from Global Environmental Consultants in August 2020.

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

Details:

1. Document review
2. Factory tour
3. Management interview
4. Environmental Impact Assessment review
5. Air emission & noise level test report review

Any other comments:

Nil

Non-compliance:

<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input checked="" type="checkbox"/> NC against Local Law</p> <p>Issue title: Wastewater test was not conducted periodically.</p> <p>Description of non-compliance: Based on document review and management interview that the facility did not conduct wastewater test periodically as per the condition of environment clearance certificate (03 months interval that is 04 times in a year for submission the test report to environment department)</p> <p>Note that last waste water test was conducted on 5th May 2021 within one year. However, Facility management has applied for conduct the waste water test to environment department on 6th June 2021.</p> <p>Local law and/or ETI/Additional Elements requirement: In accordance with Additional Elements of ETI 10B2.1 and Environmental clearance certificate Condition no. 09.</p> <p>Additional Elements of ETI 10B2.1: 10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>Environmental clearance certificate Condition no. 09. Wastewater quality test report should submit every 03 months interval that is 04 times in a year to environment department during operation running in factory. (Translated)</p> <p>Recommended corrective action: It is recommended that the factory should conduct waste water test as per requirement.</p> <p>Action By: Md. Harun Or Rashid- A.G.M (Compliance)</p> <p>Time frame: 30 days.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>1. Document review and management interview</p>
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Observation:	
<p>Description of observation:</p> <p>Local law or ETI/additional elements requirement:</p> <p>Comments: None observed.</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>

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

Other findings

Other Findings Outside the Scope of the Code
None observed

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

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>	Not Applicable
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	Not Applicable

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<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>	<p>Not Applicable</p>
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<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>	<p>Not Applicable</p>
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>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>Not Applicable</p>

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<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>	<p>Not Applicable</p>
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>
<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>	<p>Not Applicable</p>
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<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>Not Applicable</p>

<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where 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>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<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>	<p>Not Applicable</p>
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	<p>Not Applicable</p>

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>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.</p>	<p>Not Applicable</p>
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<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. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	<p>Not Applicable</p>
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	<p>Not Applicable</p>
<p>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.</p>	<p>Not Applicable</p>
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	<p>Not Applicable</p>

<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>	<p>Not Applicable</p>
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Photo Form

Non-Conformity Photo:

<p>NC Picture- 1. Narrow fabric dyeing section operator was not using hand gloves, respiratory mask and eye goggles.</p>	<p>NC Picture- 2. Eye guard of overlock machine was displaced.</p>	<p>NC Picture- 3. No MSDS, secondary containment and labelling for lube oil and diesel drum as well as stored in open space.</p>

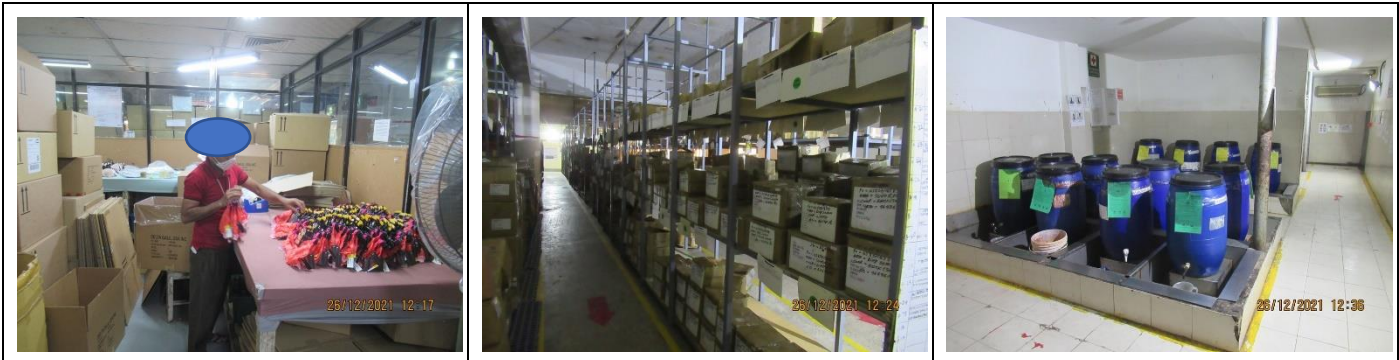
Best Practice Photo:

<p>Void</p>	<p>Void</p>	<p>Void</p>
<p>Nil</p>	<p>Nil</p>	<p>Nil</p>

General Facility Tour Photo:

<p>Entrance of facility</p>	<p>Facility Name</p>	<p>Facility Building</p>

<p>Roof Top</p>	<p>Staircase</p>	<p>Security post</p>
<p>Evacuation Plan</p>	<p>Warping section</p>	<p>Warp knitting</p>
<p>Narrow Fabric Dyeing</p>	<p>Cutting Section</p>	<p>Moulding section</p>
<p>Sewing section</p>	<p>Pressing section</p>	<p>Finishing section</p>



Packing section Accessories store Chemical store












Fabrics store Finished goods store Fire Alarm Switch



Fire Alarm Bell Exit Sign Emergency Light



Emergency Light Fire Extinguishers Fire Hose Box

PA System	Fire Extinguisher	Fire Hose reel
		
Fire Resistant Door	Fire Fighting Equipment	Smoke Detector
		
Fire Pump	Sprinkler system	First Aid Box
		
Pure Drinking Water	Electric Distribution Board	Exhaust Fan



Workers' Toilet



Complaint Box



Notice Board



Disinfection Channel



Hand Washing Facility



Covid-19 awareness poster



Medical room



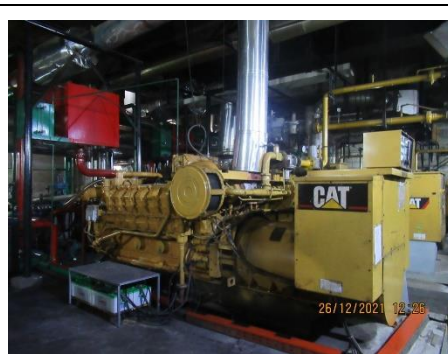
Childcare room



Canteen




Dining



Generator



Boiler

		<p style="text-align: center;"><i>Insert photo</i></p>
ETP	VOID	VOID



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

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

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