




Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1052880	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1056148
Business name (Company name):	ACS Towel Limited		
Site name:	ACS Towel Limited		
Site address: <i>(Please include full address)</i>	Holding no-1/1, Tetlab, Rupshi, Tarabo, Rupgonj, Naraynagonj	Country:	Bangladesh
Site contact and job title:	Mr. Md. Ruhul Alam Sharif – General Manager(Compliance)		
Site phone:	+8809606500445	Site e-mail:	rsharif@acstextiles.com
SMETA Audit Type:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input checked="" type="checkbox"/> Environment <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	18/09/2017		

Audit Company Name & Logo: 	Report Owner (payee): ACS Towel Limited
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Audit Conducted By					
Commercial	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
NGO	<input type="checkbox"/>	Retailer	<input type="checkbox"/>	Brand Owner	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health and Safety, Environment and Business ethics. The SMETA Best Practice Guidance Version 5 December 2015 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 SMEIA Methodology are stated (with reasons for deviation) in the SMT IA Declaration.

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

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Management systems and code implementation,
 - 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: Ruhi Tamanna

Team auditor: Chandramallika Ghosh, Rashed Ullah, Shibshankar Dey

Interviewers: Chandramallika Ghosh, Shibshankar Dey and Rashed Ullah

Report writer: Shibshankar Dey.

Report reviewer: Nawar Tazrian

Date of declaration: 24 September 2017

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

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

Non-Compliance Table

Issue <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*:			NC Findings Only <i>(note to auditor, summarise in as few words as possible NC's only)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	

0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	
0B	Management systems and code implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	2	1	0	<ul style="list-style-type: none"> facility did not ensure adequate number of hand gloves centrally connected fire alarm call point was inactive in ground floor of building-1
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
5	Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	3	
6	Working Hours	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	0	<ul style="list-style-type: none"> Consecutive working day was found
7	Discrimination	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	

8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1	0	0	<ul style="list-style-type: none"> facility did not provide employees ID card with prescribed information
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	

General observations and summary of the site:

- The Product manufactured at this site is all kinds of towel items.
- Overall responsibility for meeting the standards is taken by Md. Ruhul Alam Sharif - General Manager, Compliance
- A total 605 employees are currently working in the facility including 68 non production employees.
- Site has completed SAQ.
- The youngest worker on site was 21 years old.
- Facility has elected a team for Participation committee. Participation committee member were present during the audit. However, management informed that they communicate the outcome of the audit to the workers through notice board, and would discuss at next Participation committee meeting.
- There was no union and collective bargaining at this facility. It was also not mandatory by Local law.
- Facility has all fixed rated employees and site has no peak season.

**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:	ACS Towel Limited															
B: Site name:	ACS Towel Limited															
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	<p>Factory License: Factory License No: 14712/Narayangonj, bearing 'I' category, which is valid till 30 June 2018.</p> <p>Fire License: Fire License No: DD/Dhaka/22178/2010 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30 June 2018.</p> <p>Trade License: Trade License No: 3154 issued by Tarabo Pouroshava which is valid till 30 June 2018.</p>															
D: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	All kinds of towel items.															
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>ACS Towel Limited located at Holding no-1/1, Tetlab, Rupshi, Tarabo, Rupgonj, Narayngonj. The total land area occupied by the facility is about 150000 square feet, production area is about 201109 square feet and warehouse area is about 48700 square feet.</p> <p>Facility has started its operation since 2012. There are 04 pre-fabricated buildings and 01 RCC building in the facility premises. There are two factories in the premises. ACS Textile (Bangladesh) Ltd. and ACS Towel Ltd. The facility's structure is made of a mixture of concrete and steel.</p> <p>The detail layout of the facility is as follows:</p> <table border="1"> <thead> <tr> <th>Production Building /shed</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td colspan="3">Building 1</td> </tr> <tr> <td>Basement</td> <td>Yarn Store, Chemical Store</td> <td>Commonly used</td> </tr> <tr> <td>Ground floor</td> <td>Warping Section, Sizing Section, Weaving Section, Dyeing & Dyeing Finishing Section, Hard winding section, Lab Section and Flatbed Printing Section. Boiler</td> <td>Hard winding section used for ACS Textile (Bangladesh) Ltd.</td> </tr> <tr> <td>1st Floor</td> <td>Cutting Section, Stitching section, Inspection area, Folding section, Packing</td> <td>ACS Towel</td> </tr> </tbody> </table>	Production Building /shed	Description	Remark, if any	Building 1			Basement	Yarn Store, Chemical Store	Commonly used	Ground floor	Warping Section, Sizing Section, Weaving Section, Dyeing & Dyeing Finishing Section, Hard winding section, Lab Section and Flatbed Printing Section. Boiler	Hard winding section used for ACS Textile (Bangladesh) Ltd.	1st Floor	Cutting Section, Stitching section, Inspection area, Folding section, Packing	ACS Towel
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	section, Training room, Finished goods area.	
Building 2		
Ground floor	Medical Room, Childcare Room & Fire Control Room.	Commonly used
Building 3		
Ground floor	Chemicals store (general), Work shop.	Commonly used
1st Floor	Main general store, Officer Canteen & Dining Room.	Commonly used
2nd Floor	Workers Canteen.	Commonly used
Building 4		
Ground floor	Generator room, Compressor, Substation.	Commonly used
1st Floor	Office of Technical Section	ACS Textile
Building 5		
Ground floor	Admin & Compliance, Accounts & finance, Commercial (Export).	Commonly used
1st Floor	Show room & display center, Marketing, Commercial (Import).	Commonly used
2nd Floor	IT Room.	Commonly used
<p>Visible structural integrity issues (large cracks) observed and without structural engineer evaluation.</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Details: Based on facility visit no structural integrity issues (large cracks) was observed, also structural engineer evaluation was found.</p>		
F: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor	
G: Month(s) of peak season: (if applicable)	Round the year same	
H: Process overview:	Product manufactured: All kinds of terry towel	

<p>(Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Main production process: Warping, sizing, weaving, dyeing, washing, stitching (cutting, sewing and finishing).</p> <p>Monthly production capacity: 350 tons per month</p> <p>Number of production lines: 5 weaving machine</p> <p>Machines used: Polishing & shearing, Exhaust Dyeing machine, Chemical Supply System MPS-L, Dye stuff Dissolving System MPS-D, mini Washing & Dyeing machine (5 Kg), Garment Washing & Dyeing machine (75 Kg), Hydro Extractor machine (500 Kg), Thumble Dyer machine, Yarn Dyeing machine . 5 Kg, Padder Mangle, AUTOLAB TF 128, ELECTROLUX Washing m/c, Warping, Terry Weaving Loom 340cm, LONG CUTTING, CROSS HUMMING, Matal Ditecton M/c etc.</p> <p>Chemical used: Coratex Maize Starch, Excilla Modified Stach, Softex Wax, J-poval JP-18FT, Acrysize V4030, Texsize, Tapica Starch, Sico 52D, Penetrose 50 Maize Starch, Acetic Acid, Antimussol UDF, Bactasol PHC, Caustic Soda (Local), Cellusoft CR, Eriopon OLS, Hostapol XTRA Liq, Hydrogen Peroxide 50% Jar, Ivatex AC, Lecophore BBU Liq, Optofix EC, Roshtex NC, Samper STB, Sodium Hydrosulfite, Terminox® Ultra 50 L etc.</p>
<p>I: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee (Participation Committee) <input type="checkbox"/> Other (specify) <input type="checkbox"/> None</p>
<p>J: Is there any night production work at the site?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>K: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes approx. 10% of workers in on site accommodation</p>
<p>L: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. __% of workers</p>
<p>M: Were the site provided accommodation buildings included in this audit</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:30 hrs Day 1 Time out: 17:30 hrs	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of Auditor Days Used:	3.7 Man-day audit (4 auditors in one day)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – 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)	Md. Ruhul Alam Sharif - General Manager, Compliance		
H: Is further information available (if Y please contact audit company for details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
I: Previous audit date:	7 November 2016		
J: Previous audit type:	Periodic		
K: Was any previous audit reviewed during this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

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

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not Applicable		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	There is no trade union at this facility and it is not mandated by law.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	424	0	0	0	0	0	0	424
Worker numbers – female	181	0	0	0	0	0	0	181
Total	605	0	0	0	0	0	0	605
Number of Workers interviewed – male	29	0	0	0	0	0	0	29
Number of Workers interviewed – female	13	0	0	0	0	0	0	13
Total – interviewed sample size	42	0	0	0	0	0	0	42

A: Nationality of Management	Bangladeshi, British & Pakistani
B: Majority nationality of workers	Main countries: Country 1: Bangladeshi _approx. % total workforce_100%
C: Worker remuneration (<i>management information</i>)	<p>_____ % workers on piece rate _____ % hourly paid workers 100 % salaried workers</p> <p>Payment cycle: _____ % daily paid _____ % weekly paid 100 % monthly paid _____ % other – please give details</p>

Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	42 employees were selected for interview including 29 male and 13 female employees, they were interviewed as 06 groups each consisting of 05 employees and 12 employees were interviewed individually.
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 9 Female: 3
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: NA
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	Facility workplace condition is comfortable, timely payment of wage and benefits. Good relationship with facility management.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Total working hour is within standard limit and overtime is fully voluntary.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If Yes, please give details:</i>	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	

The employees were generally positive about their work place, they got on well with workers and managers. They found management team positive and approachable.

The employees were assured of confidentiality and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory and they are provided wages as per their agreement. They feel free to leave this employer and understood the notice period required. The facility management treated them with respect.

They are able to complain directly to their supervisors or line manager and also feel free to give their general concerns to their Participation Committee representative who would take it to the PC 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

The Participation Committee members were positive about the facility. Participation Committee members interview were conducted privately in a separate place. The participation Committee members replied naturally regarding their responsibilities as PC members and they also informed that they can easily carry out their daily job without any difficulties.

O: Attitude of managers:
(Include attitude to audit, and audit process. Both positive and negative information should be included)

The facility management showed a positive attitude to this audit and during the whole audit process. Md. Ruhul Alam Sharif - General Manager, Compliance along with his team was present through the audit process and co-operated through the whole audit. Facility management respected client's requirement and allowed auditors to take photographs of all production process, best practices and also non conformities. They also provided required documents photocopies and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions.

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

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The responsible person for implementation and monitoring Md. Ruhul Alam Sharif - General Manager, Compliance. The facility has policy and procedure for human rights.
- The facility communicates this code of conduct to the employees through notice board orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.
- Currently, 605 employees are working in the facility. The facility comprises 537 production employees and 68 non-production employees. Among the 605 employees, 424 employees are male and 181 employees are female. Generally, weekly holiday is Friday for office and general shift. The facility has three working shift respectively 6:00 am to 2:00 pm, 2:00 pm to 10:00 pm and 10:00 pm to 6:00 am with one hour lunch break by rotation. General working hour of the facility employees is 8:00 a.m. to 5:00 p.m. with 1 hour lunch break from 1:00 p.m. to 2:00 p.m. Employee's wages are calculated on a monthly basis. The payment method of the salary is Bank auto pay except 2% employees who joined after 15th of the month within 07 working days and the payment cycle is 1-30/31.

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

Details:

- Facility code of conduct.
- All policies of facility.
- Management, employee training/meeting records.

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has policy on human rights which is universal to all employees.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility have a designated person who responsible for implementing standards concerning Human Rights. Name: Md. Ruhul Alam Sharif Job title: General Manager, Compliance</p>
<p>C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.</p>
<p>D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility uses worker register and software for keeping privacy.</p>

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year : September-15 to August-16 : 3 %	This year : September -16 to August -17 3 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	June-17 to August-17 : 3 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year : September-15 to August-16: 4.9 %	This year : September -16 to August -17: 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	Jun-16 to August-16 : 4.85 %	June-17 to August-17 : 5 %
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All the injuries are recorded in an injury register. Last injury was occurred on 15 September 2017 which was a small injury in finger.	
F: Annual Number of work related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	Last year: September-15 to August-16 Number: 18	This year: September -16 to August -17 Number: 23
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]	June-15 to August-16: 09	June-17 to August-17 : 08
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year: September-15 to August-16 0	This year: September-16 to August-17 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months: 90%	12 months: 60%

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months: 2 %	12 months: 1 %
K: % complaints resolved / grievances responded to.	100 % complaints / grievances responded to	100 % complaints / grievances resolved

OB: Management system and Code Implementation

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

- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 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.

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:

- Responsibility for meeting the legal and client code requirements is taken by Md. Ruhul Alam Sharif - General Manager, Compliance.
- The facility communicates this code of conduct (COC) to the employees through notice board and orientation training.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report. Last internal audit conducted on 24 August 2017.
- Facility has internationally recognised system certifications e.g. OEKOTEX, BRC certificate of compliance.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- The facility conduct orientation training for all new employees and last training was conducted on 21 August 2017.
- Supplier 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:

- Facility Code of Conduct (COC).
- All policies of facility.
- Certifications
- Internal audit records
- Management employee training , training attendance record
- Meeting records

Any other comments: None

Management Systems:	
<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe: In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: It was noted through documentation review that facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>It was noted through the management and workers interview that overtime is voluntary for all employees. No child labour was found in the facility during the facility tour and age verification certificate found in all the reviewed personal files.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: All the employee in the facility have received orientation training where standards for forced labour, child labour, discrimination, harassment & abuse are covered. Last orientation training was held on 21 August 2017 with 04 participants and conducted by Senior Officer-Compliance.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: It was noted through Management and employees' interview they are aware about forced labour, child labour, discrimination, harassment & abuse.</p>
<p>F; Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: Facility has internationally recognised system certifications e.g. OEKOTEX certificate of Compliance</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: There is a Human resource department with 8 Employees. Head of the department is Mr. Humayun Kabir.</p>

<p>H: Is there a senior person /manager responsible for implementation of the Code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Facility has a senior person in Human Resources department responsible for implementation of the Code.</p>
<p>I: Is there a policy to ensure all worker information is confidential</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The facility has its policy that all documents of all the employee will remain confidential.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The facility has an effective key control procedure to keep the information confidential.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility conduct risk assessment to evaluate policy and procedure effectiveness.</p>
<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has an internal system to raise the issue found in risk assessments and to implement the way of reduction it.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has a policy that follows labour standards of its own suppliers.</p>
<p>Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has all required land rights licenses and permissions. The facility has incorporation and building approval plan.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has its own way to conduct and monitor the system and applies national law and practices.</p>

<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how does the company obtain FPIC: Not applicable as this is not legally required.</p>
<p>Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not applicable</p>
<p>R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not applicable</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: It was noted through land ownership agreement review and management interview that the facility does not go through illegal appropriation of land for facility building.</p>

Non-compliance:

<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: None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i> None Observed</p>
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Observation:

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

<p>Description of Good Example (GE): None observed</p>	<p>Objective evidence observed: Not applicable</p>
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1: Freely Chosen Employment

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

ETI

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current systems:

- The factory has a policy which prohibits forced labour and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Overtime is voluntary.

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

Details:

- Policy on No-Forced labour.
- Sample employee personal files.
- Time record

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes please give details and category of workers affected
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected
C: Is there Any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes please give details and category of worker affected
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Not applicable

<p>E: If any part of the business is UK based / registered & turnover is 36m+ there is a requirement to publish a 'modern day slavery statement'. Is there a modern day slavery statement published</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe finding:</p> <p><input checked="" type="checkbox"/> Not applicable</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe finding: Not applicable</p>
<p>F: Does the site understand the risks of forced / trafficked / bonded labour in it's supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe finding:</p> <p><input type="checkbox"/> Not applicable If yes please give details and category of worker affected The facility has policy on forced/trafficked labour. The facility maintain it through notice board on production floor. Overtime is total voluntary. Employees can leave their workplace freely after their respective jobs.</p>
<p>G: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe finding: The facility has policy on forced/trafficked labour. The facility maintain it through notice board on production floor. Overtime is total voluntary. Employees can leave their workplace freely after their respective jobs.</p>

Non-compliance:

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

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union in the facility but there is a Participation Committee formed by election.
- Participation Committee was formed by election on 2nd June 2016.
- Regular Participation committee meeting is held and last meeting was held on 25 August 2017.
- Meeting minutes are posted in notice board and recorded in a register.
- There are 06 members from employee side with total PC member of 12.
- PC members are not treated less favourably than other workers.
- PC members are allowed to carry out their duties within working hours without affecting their pay.

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

Details:

- Freedom of association policy review.
- PC formation records
- PC committee member list
- PC meeting register
- PC meeting minutes
- PC meeting attendance register.

Any other comments: None

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

- Union (name)
- Worker Committee (Participation Committee)
- Other (specify)
- None

B: Is it a legal requirement to have a union?

- Yes
- No

	(Trade Union not mandatory by Local Law)	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) e.g. H&S, sexual harassment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: <ul style="list-style-type: none"> • Grievance box • Participation committee representative • Welfare officer. • Immediate Supervisor • Top Management Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The supplier provide sufficient facilities to allow the committee.	
F: Name of union and union representative, if applicable:	None present	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees?	A participation committee of 12 members in place with 06 worker level members elected by the workers to represent each section of the facility	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: 2 nd June 2016
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: : 2 employees(1 male and 1 female)	
L: State any evidence that union/worker's committee is effective? Specify date of last meeting; topics	PC meeting held on once in every month. Last meeting held on 25 th August 2017 and meeting topics covered to housekeeping and time recording system.	

covered; how minutes were communicated etc.			
M: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable		
N: If Yes what percentage by trade Union/worker representation	<table border="1"> <tr> <td>___% workers covered by Union CBA Not applicable</td> <td>___% workers covered by worker rep CBA Not applicable</td> </tr> </table>	___% workers covered by Union CBA Not applicable	___% workers covered by worker rep CBA Not applicable
___% workers covered by Union CBA Not applicable	___% workers covered by worker rep CBA Not applicable		
O: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable		

Non-compliance:

<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</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: None observed</p> <p>Local law or ETI requirement: Not applicable</p> <p>Comments: Not applicable</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>
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Good Examples observed:

<p>Description of Good Example (GE):</p> <p>None observed</p>	<p>Objective evidence observed:</p> <p>Not applicable</p>
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3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1) The facility has a safety committee consisting of 8 members (4 from management side and 4 from employee side).
- 2) The facility maintained a comfortable temperature, sufficient lighting system and there is well ventilation with sufficient exhaust fan of all the production floors in this facility.
- 3) All switches in the electrical control panels have been labelled with danger sign marks and were found in good condition.
- 4) The facility posted the evacuation plans near work floors, which indicated escape routes. Exit signs and emergency lights were installed.
- 5) Drinkable water facility provided in each production floor and water test result was found suitable for drinking as per comments of the water test report. Last test was done on 14 June 2017 from Department of Public Health Engineering.
- 6) The facility has done maintenance of the machines on regular basis confirmed through the documents reviewed. Machine maintenance card hang on each machine and preventive machine maintenance carried out regularly. Last machine maintenance carried on 16 September 2017.
- 7) The facility fire extinguishers are renewed for current period and last inspection date of fire extinguisher is 14 September 2017.
- 8) Facility conducts evacuation drill on quarterly basis. Last evacuation drill was conducted at on 23 August 2017. The drill was unannounced and was monitored by Fire Officer. Total 340 participants attended the drill and it took 3:30 minutes to evacuate the whole facility.
- 9) Electrical distribution boxes are being checked on regular basis and the last check was done on 17 September 2017.
- 10) Facility has total 62 trained fire fighters and 60 rescuer.
- 11) Sufficient first aid kits stocked with necessary supplies are provided in all production floors. Total First aider no. 63 & First aid box 10.
- 12) The facility has toilets with good washing installations which are clean and safe. Total number of toilets is 35 among them 19 for male and 16 for female.

Facility firefighting equipment details:

Fire Equipment name	Total	
Fire extinguisher	DCP	443
	CO ₂	122
	Foam	11
Emergency light	55	
Smoke detector	423	
Hose reel	21	
Call point	22	
Evacuation Plan	17	

Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
Orientation Training	21.08.2017	04	Senior Officer-Compliance	New Recruit
Fire Fighting Training (FS&CD)	24.04.2017 & 25.04.2017	40	Ware House Inspector	Every Three Month
Fire Fighting Training (Internal)	29.08.2017	11	Assistant Fire Officer	Every Two Months
First Aid Training	23.08.2017	08	Medical Officer	Every Month
PPE Training	05.09.2017	05	Medical Officer	Every Month-2 times
Chemical Handling Training	06.09.2017	06	Senior Officer-Compliance	Every Month
Mid-level management training	16.09.2017	06	Deputy Manager-Compliance	Every Month
Health & Safety Training	12.09.2017	06		Every month-3 times
Awareness Training	17.09.2017	05	Medical Officer	Every Month

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

Details:

- 1) License review (Fire license, Trade license, Factory license)
- 2) Building approval plan and layout approval plan
- 3) Group insurance
- 4) Drinking water test report
- 5) Injury record and analysis report
- 6) Machine and electric maintenance record
- 7) Risk assessment report
- 8) Training record (Fire training, First aid training, PPE training and Health and safety training)
- 9) Fire drill record
- 10) Health and safety committee register
- 11) Fire equipment and electric equipment checking record

<p>A: Does the facility have general Health & Safety and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The facility has health & safety policy and these are communicated to all employees through orientation training and hanging notice board.</p>
<p>B: Are the policies included in worker's manual?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The policy is included in worker's 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</p> <p>Details: There is no structural additions without required permits/inspections</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</p> <p>Details: Visitors are informed about Health and Safety and they are provided with personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: There Is a medical room where doctor and nurse were present.</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</p> <p>Details: There was a nurse on site. First aider was found on the production floor.</p>
<p>G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Facility provides free transport to the workers.</p>
<p>H: Secure personal storage space is provided for workers in their living space and is fit for purpose</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: Facility did not provide secure personal storage space to the workers.</p>

<p>I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: Health and Safety risk assessment are conducted to identify the risk area by the facility and the facility has taken initiatives to corrective action/preventive action.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: The facility has environmental clearance certificate which is valid up to 14.05.2018.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe: The facility has meet the requirements on environmental standards, including the use of banned chemicals.</p>

Non-compliance:

1. Description of non-compliance:

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

Based on facility visit, management and workers interview it was noted that facility did not ensure adequate number of hand gloves were worn by employees in below areas:

- Sizing machine operators located at ground floor of Building-1 who were involved in mixing of chemicals. Note that, 08 sizing operators generally work in the sizing section.
- Dyeing machine operators located at ground floor of Building-1 who is involved in mixing of chemicals. Note that, facility has 08 dyeing machine and 08 operators generally work in the sizing section.

Local law and/or ETI requirement

In Accordance with working condition are safe and hygienic 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

Objective evidence observed:

1. Facility tour and management and employee interview

minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

In accordance with 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.

Recommended corrective action: It is recommended that facility should ensure adequate number of PPE is worn by employees in mentioned areas.

Verification Method: Desktop

Action By: Md. Ruhul Alam Sharif, General Manager, Compliance

Timescale: 30 days

2. Description of non-compliance:

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

It was noted through facility tour and management interview that centrally connected fire alarm call point was inactive in ground floor of building-1 during audit day due to retrofitting work of the mentioned building.

2. Facility tour and management interview

Local law and/or ETI requirement:

In accordance with 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.

In accordance with Bangladesh National Building Code 2006, Part 4, Chapter 4.4:

The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants.

Recommended corrective action: It is recommended that the facility should ensure activity of fire alarm system.

Verification Method: Desktop

Action By: Md. Ruhul Alam Sharif, General Manager, Compliance

Timescale: 30 days

Observation:

Description of observation:

It was noted through facility tour that no secondary exit was found in hard winding section (designated for ACS Textile Ltd.) at ground floor of building 1 where 30 employees were found during audit time.

Local law or ETI requirement:

In Accordance with working condition are safe and hygienic 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.

In accordance with Bangladesh Labour Rules 2015, Rule 54 (1):

Each room of the factory building where more than 20 workers are engaged, there will be at least two exits in that case and these exits should be located in such way so that every person can reach with ease and without interruption from the workplace to the exit.

Recommended corrective action:

It is recommended that facility should ensure secondary exit for the mentioned area.

Objective evidence observed:

Facility tour and management interview

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

4: Child Labour Shall Not Be Used
[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctors.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.
- There was no child or young employee observed in the facility.

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

- Recruitment policy
- Policy on No-Child labour
- Personal file including Birth certificate, primary/secondary education certificate, national ID card, etc. of sample employees
- Age verification documents

A: Legal age of employment	18 years
B: Age of youngest worker found:	21 years
C: Children present on workforce but not working at time of audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %
E: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Y give details

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

5: Living Wages are Paid

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

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

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 facility is providing local legal minimum wage BDT 5300/month for all the employees.
- Time recording system is face detection.
- All workers are 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.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- All employees were paid on or before 07th of each month by Bank auto pay except approx. 2% employees who joined after 15th of the month.
- Each employee were given a pay slip and signed for their wages.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- Facility established provident fund for the employees.
- There are some good practices by the facility; see below GE section

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

Details:

- Salary sheet review
- Overtime payment record review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review

Non-compliance:

Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:
None observed

Objective evidence observed:
(where relevant please add photo numbers)

Local law and/or ETI requirement:

Not applicable

Not applicable

Recommended corrective action:

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Objective evidence observed:

Not applicable

Comments:

Not applicable

Good Examples observed:

Description of Good Example (GE):

1. Facility provides tuition fees, books, uniform & all other expenses of education to the children. Of the employees Agreements have been signed with the schools nearby the factory in this regard.
2. In case any employee dies during serving in ACS Towel Ltd. in accident on duty or even normally, facility continues his/her last paid salary to his/her nominee every month life time.
3. Facility provides free transportation to the staffs & workers who ply between a distant home location and office.

Objective Evidence Observed:

Documents review, management and employees interview.

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 08 hours per day 48 hours per week 208 hours per month	08 hours per day 48 hours per week 208 hours per month (For all sample months)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours per day (Excluding legal waiver of 02 hours per day and 12 hours per week)	40 hours/month in August, 2017 (Current month) 50 hours/month in March 2017 (Random month) 46 hours/month in November 2016 (Random month)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
D: wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: BDT 3302.5 per month Note: Facility follows the minimum wage gazette of Textile & Cotton Industries	BDT 4450 per month August 2017 (From sample employees)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
E: overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Legal minimum: Per hour 200% of basic hourly rate	Per hour 200% of basic hourly rate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)

Wages analysis: (Click here to return to Key Information)																																																	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																
B: If No , why not?	Not Applicable																																																
C: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	42 samples from August 2017 (Current month) 42 samples from March 2017 (Random month) 42 samples from November 2016 (Random month)																																																
D: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If Yes, please give details: The Government announced pay structure on 06 July, 2011 for the workers of the Textile and cotton Industries with effect from July 2011. Note that facility is under the sub district zone for this reason facility follows the minimum wages of sub district city zone.</p> <p>For the worker level employees:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">Grades</th> <th colspan="3">Area wise Minimum Wage</th> </tr> <tr> <th>Division City</th> <th>District City</th> <th>Sub District City</th> </tr> </thead> <tbody> <tr><td>Grade 1</td><td>6696</td><td>5474</td><td>5245</td></tr> <tr><td>Grade 2</td><td>6167</td><td>5039</td><td>4825</td></tr> <tr><td>Grade 3</td><td>5902</td><td>4820</td><td>4614</td></tr> <tr><td>Grade 4</td><td>5440</td><td>4440</td><td>4247.5</td></tr> <tr><td>Grade 5</td><td>5241</td><td>4276</td><td>4089</td></tr> <tr><td>Grade 6</td><td>5032</td><td>4140</td><td>3923.5</td></tr> <tr><td>Grade 7</td><td>4845</td><td>3950</td><td>3775</td></tr> <tr><td>Grade 8</td><td>4646</td><td>3786</td><td>3617</td></tr> <tr><td>Grade 9</td><td>4505</td><td>3670</td><td>3505</td></tr> <tr><td>Grade 10</td><td>4250</td><td>3460</td><td>3302.5</td></tr> </tbody> </table>	Grades	Area wise Minimum Wage			Division City	District City	Sub District City	Grade 1	6696	5474	5245	Grade 2	6167	5039	4825	Grade 3	5902	4820	4614	Grade 4	5440	4440	4247.5	Grade 5	5241	4276	4089	Grade 6	5032	4140	3923.5	Grade 7	4845	3950	3775	Grade 8	4646	3786	3617	Grade 9	4505	3670	3505	Grade 10	4250	3460	3302.5
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Grade 10	4250	3460	3302.5																																														
E: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	If No , please give details:																																															
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: <i>Note: full time employees and please state hour / week / month etc.</i>	Please indicate the breakdown of workforce per earnings: Lowest gross salary is BDT 4450 per month August 2017.																																															
	<input type="checkbox"/> Below legal min	___% of workforce earning under min wage ___% of workforce earning min wage																																															

	<input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	100 % of workforce earning above min wage
G: Bonus (amount specify)	Bonus Scheme found: No specific bonus was found but facility has some best practices which was given in the good example section.	
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. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.	
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, please describe Deduction is only made for unauthorized absent and for Government revenue stamp.	
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	<input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility shows all real records which reflect the all scenario.	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered Yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time: Not Applicable	
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not Applicable	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not Applicable	
O: Are in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

	All employees are paid on or before the 7 th day of the following month.
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Through payroll records review and employees' interview, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other explain:

6: Working Hours are not Excessive

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Through employees' interview, overtime is voluntary.
- The facility provided hours and wages records for 12 months.
- Time cards are completed electronic.
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday.
-

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

- Salary sheet
- Payslip
- Job card
- Attendance register
- Production record

Non-compliance:

1. Description of non-compliance:

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

It was noted through document review (payroll, job card) employee and management interview that 10 out of 42 employees worked 12 days consecutively from 19 November 2016 to 1 December 2016 as a result the facility did not ensure due leave within the next 3 (three) working days for those employees.

Note that, from January.2017 to August, 2017 employees' 7th day rest is confirmed. 42 records for the month of November 2016, March 2017 and August 2017 of samples employees were checked randomly.

Local law and/or ETI requirement:

In accordance with ETI Base code 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.

In accordance with Bangladesh Labour Rules 2015, Rule 101 (1):

1) As per Section 103, if weekly leaves cannot be given to the workers, the due leaves must be given to them within the next 3 (three) working days.

Recommended corrective action:

It is recommended that factory management should ensure seven day rest period for every employees.

Verification Method: Follow-up

Action By: Md. Ruhul Alam Sharif, General Manager, Compliance

Timescale: 60 days

Objective evidence observed:

1. Document review (payroll, job card), employee and management interview

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

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: Face Detection System
B: Is sample size same as in wages section	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If N, please give details
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Details
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
	If "Other", Please define:
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Y please %detail hours, % and types of workers & affected and frequency Details
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	Please select all applicable: <input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No If 'No', please explain: From time card and payroll review and management interview consecutive day was found in the random sample month November 2016.
	Is this allowed by local law? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Maximum number of days worked without a day off (in sample):

	12 days	
Standard/Contracted Hours worked		
G: Standard working hours over 48 per week found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, please give details Not Applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	40 hours/month in August, 2017 (Current month) 50 hours/month in March 2017 (Random month) 46 hours/month in November 2016 (Random month)
J: Combined hours (standard/contracted plus= total) 60 found?	No	
K: Approximate percentage of total workers on highest overtime hours	20 %	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:
		Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory or facility management never forces employees to do overtime.
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	Please give details of normal day overtime premium as a % of standard wages: 200%
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe 200 % of workers & frequency: Overtime payments for employees are as per legal requirement

<p>O: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.</p>	<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 Not Applicable </p>
	<p>Please explain any checked boxes in N above e.g. detail of consolidated pay CBA or Other.</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. Multi select is possible.</p>	<p> <input 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) Not applicable. Weekly working hours were of sample employees were within 60 hours in the sample months. </p> <p>Please explain any checked boxes in R above</p> <p>Not applicable</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please describe For meeting the shipment date and buyers urgency. </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable as the facility has sufficient workforce. </p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 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.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

- Policy of Anti-Discrimination.
- Recruitment policy.
- Training record.
- Female employee rights

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 95 % Female: 5 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst	#: 0
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement Not Applicable.

Professional Development

A: What type of training and development are available for workers?	Orientation Training First Aid Training PPE Training Chemical Handling Training Health & Safety training Electrical Safety Training
---	--

B: Are HR decisions on e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
---	---

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

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

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

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
 8.5 Employment agencies must only supply workers registered with them.
 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

- All employees were recruited by the factory directly.
- No subcontractors were used.
- Factory maintains service books for all workers.

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

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.

Non-compliance:

Description of non-compliance:

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

It was noted through facility visit and management interview that, facility did not provide employees ID card with prescribed information of the facility. The provided id card missed information of emergency contact, permanent address etc.

Local law and/or ETI requirement:

Regular Employment ETI Base Code, point: 8.1:

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

In accordance with Bangladesh Labour Rules 2015, Rule-19(5):

Each owner will provide identity card with the photograph to each worker working in the firm at the costs of the owner as per Form-6.

Recommended corrective action:

It is recommended that the facility should provide ID card with prescribed information to all employees.

Verification Method: Desktop

Action By: Md. Ruhul Alam Sharif, General Manager, Compliance

Timescale: 90 days

Objective evidence observed:

1. Facility tour and management interview

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions If any are unchecked, please describe finding and specific category (ies) of workers affected:
C: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes Please describe details and specific category (ies) of workers affected
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:	Not Applicable.

Migrant Workers:

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

B: Type of work undertaken by migrant workers:	Not Applicable.
C: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used Not Applicable.

<p>D: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: Not Applicable.	Observations
<p>E: Are Any migrant workers in skilled, technical, or management roles</p> <p>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</p>	#: <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes number and example of roles Not Applicable.	

NON-EMPLOYEE WORKERS

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

<p align="center">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></p>	
<p>A: Number of agencies used (average):</p>	And names if available: Not Applicable

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

Contractors:

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,

A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: If Y, how many contractors are present
B: If Yes , how many workers supplied by contractors	Not Applicable
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
If Yes , please give evidence for contractor workers being paid per law:	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable

8A: Sub-Contracting and Homeworking

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- Subcontracting is not used in the facility.

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

- Shipment record
- Goods in and out register
- Production record
- Goods in and out gate pass / records

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

Not applicable

Details: None

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI /Additional Elements requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:
 (where relevant please add photo numbers)

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI/Additional elements requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

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

Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
F: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details: Not Applicable		
G: Number of homeworkers	Male: Not Applicable	Female: Not Applicable	Total: Not Applicable
H: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents Not Applicable		
I: If through agents, number of agents	Not Applicable		
J: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable		
K: How does site ensure worker hours and pay meet local laws for homeworkers?	Not Applicable		
L: What processes are carried out by homeworkers?	Not Applicable		
M: Do any contracts exist for	<input type="checkbox"/> Yes		

homeworkers	<input type="checkbox"/> No Please give details: Not Applicable
N: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: The facility has a designated channel to conduct grievance handling procedure.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers are aware of health and safety. And there is a grievance box in each floor.</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>Hotline and Grievance box.</p>
<p>D: Is there a grievance mechanism in place for:</p>	<p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other Details: Workers can place their grievance verbally or in written. Workers can also keep their identity confidential if required.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details</p>
<p>F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details</p>
<p>G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms (e.g., help lines or whistle blowing mechanism</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No Please give details</p>

<p>H: Is there a published and transparent disciplinary procedure</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No please explain</p>
<p>I: If yes, are workers aware of these the disciplinary procedure</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no please give details</p>
<p>J: 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 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 has established anti-harassment 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.
- Anti-harassment issue is covered in orientation training; last held on 21 August 2017 with 04 employees conducted by Sr. Officer-Compliance.
- Through the factory management and employee interview, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

- Anti-Harassment policy
- Grievance box open register
- Orientation training record

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

Not applicable

Objective Evidence Observed:

Not applicable

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

- Only employees with a legal right to work shall be employed or used by the factory.
- The youngest age was 21 years old.

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

Details:

- Factory recruitment policy
- Employees personal file.

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI /Additional Elements requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

Description of observation:

None observed

Local law or ETI/Additional Elements requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

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

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

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

B.4. Compliance Requirements

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

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

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

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

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

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

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- Facility has Environmental Clearance Certificate (ECC) and it is valid till 14 May 2018.
- Facility has a written environmental policy.
- Facility has done environmental impact assessment.
- Facility produces waste water from production and has running effluent treatment plant.
- Facility has wastage agreement with the licensed vendor to provide and recycle the solid waste of the facility.

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

Details:

- Facility environment policy and procedure
- Environment management system documents

- Air and noise test report.
- Water and energy consumption register
- Wastage register
- Contract for wastage disposal

Non-compliance:

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

<p>Description of observation: None observed Local law or ETI/additional elements requirement: Not applicable Comments: Not applicable</p>	<p>Objective evidence observed: Not applicable</p>
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Good examples observed:

<p>Description of Good Example (GE): None observed</p>	<p>Objective Evidence Observed: Not applicable</p>
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Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Responsible for Environmental issues (Name and Position):	Md. Ruhul Alam Sharif, General Manager, Compliance
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility has done environmental impact assessment on February 2012.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please detail.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Facility has OEKOTEX certification.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, is it publicly available? Yes. Facility has an environmental policy to reduce environmental pollution and wastage.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility does environmental assessment based on their operation procedure.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please detail. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: There is no other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.
H: Have all legally required permits been shown? Please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility has all legal permissions from concern authority.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Details: Facility uses hazardous chemical for production purposes. They have a documentation system to record the above chemicals.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: There is a system for managing client's requirements and legislation regarding environmental and chemical issues.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility has policy and procedure to reduce water and energy consumption; green-house gas

emissions	emissions.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Facility has no waste recycling procedure.	
M: Facility has a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Facility has a measuring system to monitor the energy consumption.	
N: Facility has checked that any Sub-Contracting agencies or business partners operating on the premises have appropriate permits and licences and are conducting business in line with environmental expectations of the facility	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility has a policy for sub-contracting agencies or business partner selection.	
Usage/Discharge analysis		
Criteria	Current year: Please state period: January to July 2017	Previous Year: Please state period: January to December 2016
Electricity Usage: Kw/hrs	5407967 KW/H	10985763 KW/H
Renewable Energy Usage: Kw/hrs	N/A	N/A
Gas Usage: Kw/hrs	ACS Textiles & Towel 16107804 m ³	ACS Textiles & Towel 43309862.45 m ³
Has site completed any carbon Footprint Analysis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes , please state result	Stack Emission Analysis(CO2)	Stack Emission Analysis(CO2)
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> Deep Well (Underground water source) 	<ul style="list-style-type: none"> Deep Well (Underground water source)
Water Volume Used: (m ³)	746650 m ³	915560 m ³
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> Drainage System 	<ul style="list-style-type: none"> Drainage System
Water Volume Discharged: (m ³)	447990 m ³	549336 m ³
Water Volume Recycled: (m ³)	214213 m ³	352313 m ³
Total waste Produced (please state units)	473073 m ³	785135 m ³

Total hazardous waste Produced: <i>(please state units)</i>	ETP Sludge-6232 bag 1 bag= 20 kg	ETP Sludge-15559 bag 1 bag= 20 kg
Waste to Recycling: <i>(please state units)</i>	214213 m ³	352313 m ³
Waste to Landfill: <i>(please state units)</i>	N/A	N/A
Waste to other: <i>(please give details and state units)</i>	N/A	N/A
Total Product Produced <i>(please state units)</i>	96 Ton	350 Ton

10C: Business Ethics – 4-Pillar Audit

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

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The facility is registered on SEDEX. The integrity policy of Intertek was given to the facility prior to start the audit. The management acknowledged this, signed it and kept a photo copy.
- The company manual contains the details of Business Ethics; moreover they have anti-bribery and anti-corruption policy. The Business integrity policy was established and communicated to all employees by company manual, employee hand book and orientation and regular training.
- Based on facility's management interview, the facility was familiar on local regulations/laws concerning business integrity standards.
- Md. Ruhul Alam Sharif, General Manager, Compliance was appointed responsible for business integrity.
- The employees have their orientation training on business ethics when they first start their job. Mid-level management training was held in a periodic manner. The last meeting was held on 16 September 2017.
- The Admin and Compliance department determines all job roles and responsibility categorised by section.

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

Details:

- The company business ethics policy including bribery, corruption
- Training records

Non-compliance:

Description of non-compliance:

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

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation	
Description of observation: None observed Local law or ETI/additional elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of observation: None observed Local law or ETI/additional elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers Please give details: The facility have an Internal Business Ethics Policy
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy updated on a regular (as needed) basis
D: Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable

Other Findings Outside the Scope of the Code

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>

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>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>
<p>ETI Code / Additional Elements</p>	<p>Customer's Supplier Code equivalent</p>
<p>0.A. Universal Rights covering UNGP</p>	<p>0.A. Universal Rights covering UNGP</p>
<p>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.</p>	
<p>0.B. Management Systems & Code Implementation</p>	<p>0.B. Management Systems & Code Implementation</p>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.2 Suppliers shall appoint a senior member of management who shall be responsible for</p>	

<p>compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 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. 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>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. 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.</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. 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</p>	

<p>workers. 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. 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>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. 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.</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. 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</p>	

<p>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>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 provide regular employment, nor shall any such obligations be avoided through the excessive use</p>	

<p>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>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>10. Other Issue areas: 10A: Entitlement to Work and Immigration</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>10. Other issue areas 10B2: Environment 2-Pillar</p>	
<p>10B2.1 Suppliers must comply with the requirements</p>	

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

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

Photo Form

Best Practice photos:













Nil	Nil	Nil
Nil	Nil	Nil













Non-compliance Photos:



Nil	Nil	Nil
Nil	Nil	Nil













General Site Tour Photos:

Facility Name Plate	Facility main gate	Production Building-1

		
<p>Evacuation Plan</p>	<p>Assembly area</p>	<p>Security Check Post</p>
		
<p>Yarn store</p>	<p>Chemical store</p>	<p>Winding section</p>
		
<p>Warping section</p>	<p>Sizing section</p>	<p>Weaving section</p>
		
<p>Dyeing section</p>	<p>Hard winding section</p>	<p>Printing section</p>

		
<p>Stitching section</p>	<p>Finishing section</p>	<p>Bare window</p>
		
<p>Aisles mark</p>	<p>Training room</p>	<p>Staircase</p>
		
<p>Fire Extinguisher</p>	<p>Hose pipe check</p>	<p>Exit Sign</p>
		
<p>Sprinkler system</p>	<p>Emergency Light</p>	<p>Fire alarm</p>

		
<p>Gong bell</p>	<p>No-smoking sign</p>	<p>Fire alarm switch</p>
		
<p>Eye wash station</p>	<p>Public address system</p>	<p>Smoke detector</p>
		
<p>Auto fire extinguisher</p>	<p>Thermometer</p>	<p>Exhaust fan</p>
		
<p>Dinning Area</p>	<p>Toilet area</p>	<p>Complain box</p>

		
<p>First aid box</p>	<p>Notice board</p>	<p>Firefighting equipment</p>
		
<p>Drinking water area</p>	<p>DB board</p>	<p>Firefighter</p>
		
<p>First aider</p>	<p>Child Care Room</p>	<p>Medical Room</p>
		
<p>Boiler room</p>	<p>Generator room</p>	<p>Fire Pump</p>

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End of report.



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