



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC413320412	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS413321662	
Business name (Company name):	SPORTING SYNDICATE INTERNATIONAL PVT LTD			
Site name:	SPORTING SYNDICATE INTERNATIONAL PVT LTD			
Site address:	Kapurthala Road, Wariana, Punjab, India N/A JALANDHAR 144021 IN	Country:	IN	
Site contact and job title:	Mr. Dinesh Kumar Sharma / Compliance Manager			
Site phone:	9988882003	Site e-mail:	sales3@sportsgoodsindia.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2024-02-14			

Audit Company Name:
TUV Rheinland (TUEV Rheinland)

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Gaurav Gandhi	APSCA Number:	21701607
Additional Auditors:	Shashi Pandey		21703125
Date of declaration:	2024-02-14		

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.

Site Representation	
Full Name:	Mr. Dinesh Kumar Sharma
Title:	Compliance Manager
Date of declaration:	2024-02-14
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
Nil	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1	§1 §2 §3	3	0	0	NC - ZAF600352232 NC - ZAF600352233 NC - ZAF600352234
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

§2	In accordance with factory act 1948 section 7A(1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.
§3	In accordance with the Factories act Section 46 (1) The state government may make rules requiring that in any specified factory wherein more than 250 workers are ordinarily employed, a canteen or canteens shall be provided and maintained by the occupier for the use of the workers.

Site Details

Site Details		
Company Name	SPORTING SYNDICATE INTERNATIONAL PVT LTD	
Site Name	SPORTING SYNDICATE INTERNATIONAL PVT LTD	
GPS location (if available)	GPS Address:	Village – Wariyana, Kapurthala Road, Jalandhar, Punjab
	Coordinates:	Longitude: 31.344683, Latitude : 75.511264
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License- JAL0FL8496 dated 26.12.2023 valid till 31.12.2028 •Building Stability Certificate by Engineer Ajay Pal Singh dated 19.05.2022 •Fire License no. 1013-72562-Fire/54275 dated 14.06.2023 valid till 13.06.2024. •Approval of Building Plan DOF220784117 dated 04.07.2022 by Additional Director of Factories •Pollution Consent for Air : 21551948 dated 28.03.2023 valid till 22.08.2025 •Pollution Consent for water : 21552006 dated 31.03.2023 valid till 22.08.2025 • Approved Standing Order No 19593 dated 24.07.2014 • Electrical inspection Certificate dated 18.03.2023 by S.S. Electricals	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of sports goods./ The main production processes are listed as follows: Cutting – Sewing/ Moulding – Printing – Finishing – Packaging and Dispatch	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	M/s SPORTING SYNDICATE INTERNATIONAL PVT. LTD. is a private limited firm located at Village – Wariyana, Kapurthala Road, Jalandhar, Punjab. The total land area occupied by the facility is 10612 Square meters. And the covered area is 1400 Square meters including all floors. The Facility was established in Year July 2020	

Structure and number of buildings	Building Name:		1
	Floor	Description	Remark
	Basement	Showroom, Office Area	There is no other company in the plant
	Ground	Office area	The building is 17 years old.
	First	Packaging and Finishing	Nil
	Second	Screen Printing and Drying Area	Nil
	Building Name:		2
	Floor	Description	Remark
	Ground	PVC Storage, Finishing, Kit making, Moulding, Lab, Packaging and Packed goods storage.	Nil
	Mezzanine	Lunch area	Nil
	First	Garment Stitching, Finishing and Packaging + Football & Rugby Finishing & Packaging.	Nil
	Second	Lamination, Cutting, Printing and Stitching for Rugby and Football + Garment Stitching, Cutting, Finishing and Packaging.	Nil
	Building Name:		3
	Floor	Description	Remark
	Ground	Garment Finishing and Packaging.	Nil
	First	Garment Cutting and Stitching.	Nil
	Building Name:		4
	Floor	Description	Remark
	Ground	Tool Room and Scrap Storage.	Nil
	First	Raw material Storage.	Nil
Periphery	Security area, Utility, Crèche, Chemical Store and rugby passing area	Nil	

Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No structural integrity issue was found during visit.
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: •Building Stability Certificate by Engineer Ajay Pal Singh dated 19.05.2022.
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
Months of peak season	Select a month to Select a month
Process overview	Manufacturing of sports goods. •The main production processes are listed as follows: Cutting – Sewing/ Moulding – Printing – Finishing – Packaging and Dispatch •The main equipment used by the facility for the production process are Stitching machines 134, Power Press 06, Injection Moulding 06, Overlock Machines 26, Metal Detector 02, fabric Checking machines 01, Air Compressor 02 and DG set 01, power press, Laser, Printing.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Worker committee has been formed with 09 members, in which 03 are from management and remaining 06 are from worker sides .
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No accommodation was provided to the employees.

Audit Parameters		
Time in and time out	Day 1	
	In	09:00
	Out	17:30
Audit type:	FULL_INITIAL	
Was the audit announced?	SEMI_ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Mr. Dinesh Kumar Sharma / Compliance Manager	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	There is no union in the plant.		
<i>Reason for absence during the audit</i>	There is no union in the plant. Worker Representative was busy in production.		
<i>Reason for absence at the closing meeting</i>	There is no union in the plant.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	308	0	0	0	0	0	0	308
Worker numbers - female	162	0	0	0	0	0	0	162
Total	470	0	0	0	0	0	0	470
Number of Workers interviewed - male	16	0	0	0	0	0	0	16
Number of Workers interviewed - female	10	0	0	0	0	0	0	10
Total - interviewed sample size	26	0	0	0	0	0	0	26

Nationalities Structure	
Nationality of Management	Indian
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Indian approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no peak or lean season .
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: All are on monthly wages.

Worker Interview Summary	
Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	Total 04 groups . 02 groups of 5 females in each group and 02 groups of 5 males in each group.
Number of individual interviews:	Male: 6 Female: 0
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	Nil
What did the workers like the most about working at this site?	Good management , No work pressure , Timely payment and healthy environment.
Any additional comment(s) regarding interviews:	Nil
Attitude of workers to hours worked:	Overtime is voluntary . There shift timing is fix and they never came on Sundays . They can come late and there is no deduction for that.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

The workers for the interviews were chosen freely without any influence by the factory management from all production areas. The workers interviews were conducted at private room away from management area. Workers showed positive attitude towards the management and forthcoming in their answers. All interviewed workers were knowledgeable about the ETI code and aware of the requirements. No negative information reported. All workers confirmed the working hours and wages information.

Attitude of worker's committee/union reps:

There are no unions in the facility but the workers have formed different committees to express their concerns. The elections are conducted transparently and the worker representatives are elected by the workers. The committees meet regularly and the meeting Minutes are recorded. Worker representative confirmed that there is no difference in treatment between workers participating in the committees and those who are not member.

Attitude of managers:

The management is very cooperative and supportive during the audit process. All documentation requested for review was provided in a timely manner. At the end of the audit, all the non-compliances were accepted by the facility.

0A - Universal Rights covering UNGP
[Summary of Findings]

0A: Compliance Requirements

- 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:

Appropriate system in place for the Universal rights covering UNGP. Factory has derived the policy, endorsed at the highest level, covering human rights impacts and issues, and ensures it is communicated to all appropriate parties and appointed a designated person responsible for implementing standards concerning Human rights, identified their stakeholders and salient issues and measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights, and procedure for the data privacy procedures for workers' information, which is implemented.

Evidence examined:

Policy, procedure, stakeholder detail, Appointment letter of MR, personal file.

Any other comments:

Nil.

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policy is available and policy is to respect human rights.
Are the policies included in workers' manuals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No workers manuals but training provided to all worker on policy.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Compliance Manager is designated for implementing standards concerning Human Rights.

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Suggestion/ Complaint boxes had been provided at conspicuous places in the facility through which workers express their suggestion / complaints if any.				
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has data privacy policy and procedures review date 01.02.2024.				
Measuring Workplace Impact					
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))	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">6.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">4.0%</td> </tr> </table>	Last year	6.0%	This year	4.0%
Last year	6.0%				
This year	4.0%				
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 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	4.0%				
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">9.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">7.0%</td> </tr> </table>	Last year	9.0%	This year	7.0%
Last year	9.0%				
This year	7.0%				
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	7.0%				
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had maintained Form-26 & 26A, however no accidents were occurred till date.				
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">0.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">0.0%</td> </tr> </table>	Last year	0.0%	This year	0.0%
Last year	0.0%				
This year	0.0%				

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
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	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

OB - Management Systems and code Implementation
[Summary of Findings]

OB: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Factory has established the policy and procedure and clearly defined roles and responsibilities. Management has communicated the ETI base code of conduct within factory. Factory has displayed the policies, procedures and ETI code for the workers reference and factory obtained appropriate factory licenses and permits with respect to local and national law. Compliance manager as management representative to implement and monitor the compliance requirements.

Evidence examined:

Policies and Procedures.
 ETI base code communicated on date: 04.12.2023 to all employees.
 ETI base code communicated to supplier for example Kapila Rubber Industries on date 21.12.2023.
 Payroll records.
 Personal files & appointment orders.
 Factory license: JALOFL8496 dated 26.12.2023 for 500 employees, 205 KW. Valid until 31/12/2028.
 Internal audit done on date: 26.09.2023.
 Management review done on date: 26.10.2023.

Any other comments:

Nil.

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such fine imposed on the site till date.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has established policies and procedure with respect to social compliance on forced labour, child labour, discrimination, harassment & abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has effectively implemented the social compliance system and ensures the same by conducting an audit on regular interval. Necessary corrective and preventive action have been taken by the facility for the non-compliance raised during the audits. Further, the report of the same was maintained by the facility.

<p>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 give details:</p> <p>All the managers and employees undergo an consolidated training. Where the social compliance policies and procedures are explained. Last training provided on 04.12.2023.</p>
<p>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 give details:</p> <p>Based on interaction with the employees, it was noted that provided training is effective.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>ISO 9001-2015 certificate No. FM 524538 valid up to 23.06.2024 from BSI, ISO 14001:2015 certificate No. U-04993/0 Valid up to 04.12.2026 from Qualityaustria.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>HR office is there with 2 persons.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Compliance manager is responsible for implementing the code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a data protection policy to ensure all confidential information is kept confidential.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a data protection policy to ensure all confidential information is kept confidential.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a system of conducting risk assessment and audits to evaluate the effectiveness of policy and procedures and update the same if required. Last risk assessment conducted on 04.01.2024.</p>
<p>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</p> <p>Please give details:</p> <p>Based on the interaction with the management and review of records, effective action has been taken for the risks identified during risk assessment.</p>

<p>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</p> <p>Please give details:</p> <p>Facility has a documented policy/ ethical code covering labour standards of its own suppliers. Policy is communicated to the suppliers.</p>
<p>Land Rights</p>	
<p>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</p> <p>Please give details:</p> <p>Facility is in own building, and registry done.</p>
<p>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</p> <p>Please give details:</p> <p>Facility conducts legal due diligence.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility have written policy and procedures specific to land rights.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has compensated the owner for the land prior to the facility being built.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has taken legal opinion before taking the land.</p>
<p>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</p> <p>Please give details:</p> <p>Not Applicable.</p>

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements

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 facility has a policy which prohibits forced labour and this was available for review. There was a non-formalized application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers. The employee appointment letter – issued to all workers on joining, states that workers within their probation period are free to leave without any notice and once a worker is permanent (this is out of probation) they can resign from the facility with one month's prior written notice, given to their supervisor or the personnel office. The facility did not require payment for work tools, PPE, and training. The facility did not use prison labour. The above was confirmed in management and employee interview.

Evidence examined:

Personnel files (26 files checked).
Appointment letter.
Facility rules.
Management and employee interview.

Any other comments:

Nil.

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Employees are free to leave their workplace without any restriction at the end of the workday.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: No part of the facility business is UK based or registered there.

<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 give details:</p> <p>Employees are free to leave their workplace without any restriction at the end of the workday.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Facility understand the risk of forced / trafficked / bonded labour in their supply chain. No such types of employees are noticed in supply chain.</p>
<p>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 give details:</p> <p>Facility has policy not to employ forced / trafficked labour. Facility has implemented system like suggestion box, grievance handling mechanism to identify and resolve issues related to forced/trafficked labour.</p>

2 - Freedom of Association and Right to Collective Bargaining are Respected
[Summary of Findings]

2: Compliance Requirements

- 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:

Facility encourages and respects all employees' rights to join union freely. Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision. The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference. Proprietor is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management. At present, there was no union / trade union in the facility. Facility has formed works, grievance committee to address workers issues and minutes of meeting records were available. Employees without distinction, have the right to join any union or form trade unions of their own choosing and to bargain collectively.

Evidence examined:

Facility Policy and Procedures.
Election records of Workers, Grievance Committee and minutes of meeting of Grievance Committee dated 23.12.2023.
Interaction with Management and Interview with employees.

Any other comments:

Nil.

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union	<input checked="" type="checkbox"/> Worker Committee
	<input type="checkbox"/> Other	<input type="checkbox"/> None
Other details:	Facility has Works committee, Grievance handling Committee, ICC Committee.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

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 Please give details: Facility has formed Worker, ICC, Grievance and Health and Safety Committee, where employees are free to communicate their problems / suggestions / complaints and grievances. While interviewing, all employees reported that they are free to approach the management for any problem. Suggestion/complaint boxes are also provided.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Based on employee's interview and review of records, it was noted that committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.
Name of union and union representative, if applicable:	Not Applicable, No Union in the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers, Grievance handling committee.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on employee's interview, it was noted that workers were aware about committee representative.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-12-20
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Facility has Formed workers committee and Meeting conducted every three months last meeting held on 23.12.2023.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic
[Summary of Findings]

3: Compliance Requirements

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:

- The facility has a system in place to ensure a safe and hygienic working environment is provided to the workers.
- Health and safety Officer is responsible for Health and Safety in the factory.
- Workers are given regular health and safety trainings, as well as for fire safety.
- The facility maintains the firefighting equipment periodically.
- Mock evacuation drills are conducted once in 3 months.
- Machine safety: The machines provided with adequate safety switch off and protective devices.
- Personal safety: The workers were provided with appropriate and adequate personal protective equipment as and when required. The PPE was provided free of cost and replaced whenever necessary.
- Facility has constituted Health and Safety committee with 10 members (3 from management and 7 from workers). The committee meet once in 3 months to discuss the health and safety issues in the facility.
- Risk identified in various department and proper corrective and preventive measures are taken.
- Purified and adequate potable water is provided.
- Toilets and drinking water facility was available for all employees.
- Management is having own hospital name Prabhu Kirpa Charitable Hospital , which is 0.5 km from factory.

Evidence examined:

Factory walk through / safety committee meeting minutes / minor injury records / accident records / PPE issue records / safety training records / first aid training certificates, fire safety training records / report of Onsite monitoring.

Details:


- Health and Safety Policy SP/SSIPL/00, Rev 00 dated 15.07.2020. Last reviewed on 01.02.2024.
- Health and safety Committee meeting dated 23.12.2023.
- Employee induction training records
- External Fire Fighting training was given on 16.09.2023 by Amit Fire Protection
- Mock Drill and Internal Fire Fighting training : last mock drill on 08.01.2024 at 03.10 pm . Total time taken 02.45 minutes and head count is 451.
- Fire equipment inspection frequency is monthly basis.
- Total 14 First aid boxes are provided in the plant under 10 first aiders
- Emergency Preparedness plan dated 01.04.2023
- There was total 74 fire extinguishers, 16 manual fire alarm call points, 10 hose reel, 08 fire hydrant, 26 Emergency Lights, 04 smoke detectors, 01 fire alarm panel and 08 sand buckets throughout the plant.
- Health and safety Risk assessment No.SSIPL/HIRA-00, Rev 02 dated 04.07.2023
- Employees last medical checkup was done in March 2023 from Prabhu Kirpa Charitable Hospital .
- Trained fire Fighters total 10.
- Training records were reviewed:
Chemical handling on 04.12.2023
Health and Safety Training on 02.01.2024
Machine safety on 08.01.2024
Waste material handling on 08.01.2024
- Emergency Preparedness on 11.12.2023
- Safety equipment maintenance records
- Injury register
- Drinking water testing report No. SE1204001523/N dated 09.12.2023 by SIMA labs
- DG stack emission testing report No. SE1204003823/N dated 09.12.2023 by SIMA labs
- Air Quality testing report No. SE1204003723/N dated 09.12.2023 by SIMA labs
- Lux testing report No. SN0225002723 dated 27.02.2023 by SIMA labs
- Noise testing report No. SE1204003923/N dated 09.12.2023 by SIMA labs
- Earth Pit Testing report dated 20.03.2023 by S S Electricals
- Air Compressor Pressure Vessel testing dated 15.11.2023 valid till 14.05.2024
- Chain Pulley and Hoist safety testing report dated 15.11.2023 valid till 14.11.2024.

Any other comments:


Nil

<p>Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The company has established the health and safety policy and emergency response procedure, the same is communicated to the workers during health & safety training and display in the plant.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No workers' manual was issued .</p>
<p>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>Please give details: No structural addition was found during visit.</p>

<p>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>Please give details: Oral instruction provided to the visitors about following the health and safety procedures by Security guard at gate.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Total 14 First aid boxes are provided in the plant under 10 first aiders</p>
<p>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>Please give details: Total 14 First aid boxes are provided in the plant under 10 first aiders.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: 02 bus are provided for free transport facility for employees.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No living space was provided for the employees.</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Risk assessment was covering the health risk for workers doing overtime .</p>
<p>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 give details: •Pollution Consent for Air : 21551948 dated 28.03.2023 valid till 22.08.2025 •Pollution Consent for water : 21552006 dated 31.03.2023 valid till 22.08.2025</p>
<p>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 give details: As per customer, there is no use of any banned chemical and management was not using any banned chemical in production.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600352232	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	274 - Proper safeguards not used to prohibit unauthorised access/use of dangerous machinery (e.g. panels left open / keys left in forklift etc.)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.	
ETI 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.	
Explanation to the non compliance	During plant visit, it was found that no cover was provided on exhaust fans provided in Building 2 ground floor storage area and in Building 4 first floor storage area.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days	
		 Exhaust fan was not covered .JPG

	<input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Management should cover all exhaust fans to prevent the injury during working.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600352233	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with factory act 1948 section 7A(1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	<p><u>Employee was not using eye gurad during working on overlock machine.JPG</u></p>
Explanation to the non compliance	During plant visit, it was found that two out of 8 employees working on overlocking machines in stitching area were not using the eye protection guard at 2nd floor in Building no 02.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days	

	<input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Management should ensure that all employees use the PPEs during production.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600352234	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	335 - No canteen facility provided as per local law	
Subcategory	Hygiene Facilities & Housekeeping	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the Factories act Section 46 (1) The state government may make rules requiring that in any specified factory wherein more than 250 workers are ordinarily employed, a canteen or canteens shall be provided and maintained by the occupier for the use of the workers.	
ETI 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.	
Explanation to the non compliance	During plant visit , it was found that functioning canteen was not provided in the plant	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	Management should provide functioning canteen for the employees as applicable for 250 plus employees.	

4 - Child Labour Shall Not Be Used
[Summary of Findings]

4: Compliance Requirements

- 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:

Based on interaction with the facility management, all employees are hired by the HR team. Based on review of hiring policy documents, employee's ID for age proof such as Voter ID, Aadhar Card, and School Certificate was checked by HR team prior to hiring. The employees without valid ID certificates are not being hired. Based on the policy review, the minimum hiring age of the facility is above 18 years old. Based on employees' interview, any suspect of child labor can be reported to facility management. Based on the employee interviews, review of facility's Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child labor.

Evidence examined:

Child Labor policy and Child Labor Remediation Policy.
Age Proof records of 26 out of 26 selected samples.
Interaction with Management and Interview with employees.

Any other comments:

Nil.

Legal age of employment:	15
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No workers under 18 years of age.

5 - Living Wages are Paid
[Summary of Findings]

5: Compliance Requirements

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:

Factory is paying the legal minimum wage as per the Minimum wage declared by government. Other benefits paid as per local law for Earned Leave, Casual Leave and Sick Leave. Workers are receiving overtime allowance at premium rate (double of the basic) whenever it is happened. Workers were paid on monthly basis on or before 7th of every month. The factory pays wages through bank transfer and provided the pay slips to workers for verifying their wages.

Evidence examined:

Minimum wages Notification, Wage records, time records, policies. Company has provided bases record of last 12 months and auditor verified 3 months records as February-2023, September-2023 and January-2024.

Any other comments:

Nil.

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 412.95 Per Week: null Per Month: 10736.75	Actual Per Day: 413.0 Per Week: 2478.0 Per Month: 10737.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 207.0 Per Week: 1239.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO

Wages Analysis:	
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 Record for month of February -2023, 26 Record for the month of September- 2023 and 26 Record for the month of January 2024.
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Un skilled: 10736.75 per month, Semi-skilled- 11516.75 per month, Skilled- 12413.75 per month. From 1st September 2023.
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"/> Not Applicable Please give details:
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	INR 10737 / Months for Unskilled workers.
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 100.0% of workforce earning minimum wage 0.0% of workforce earning above minimum wage
Bonus Scheme found: Please specify details:	Bonus Scheme found:8.33 % of gross wages. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	Employee state insurance, Employee Provident fund and Labour welfare fund.
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Employee state insurance, Employee Provident fund and Labour welfare fund.
Please list all deductions that have not been made.	None.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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 Please give details: All training and meeting were provided during working hours.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

6 - Working Hours are not Excessive
[Summary of Findings]

6: Compliance Requirements

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:

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:

Facility has 06 days a week working in one shift. Details are given below General shift: 09:00 am – 5:30 pm, Lunch break 30 minute: 1:00 pm– 1:30 pm. Weekly Holiday: Sunday.

Evidence examined:

In / Out time records, Muster roll, Over time record & Wage Slip.
Based on the review of time record of the months – February 2023, September- 2023, January-2024 and Employee's interview, the facility has trained all the employees during their induction training on Recording IN/OUT time. The time records were appropriate and meeting legal requirement.

Any other comments:

Nil.

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	The facility has biometric IN/OUT time recording for all the employees.
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	No Overtime done in the facility.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No Overtime done in the facility.
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: As per workers interview, overtime is voluntary.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: This is not applicable as no Overtime done in the facility.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 200 % of normal wages if happen in the facility.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other

Please give details	Not applicable. site pays 200 % OT premium if OT happen however no overtime in the facility.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not applicable.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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:

Based on review of wage records and employee's interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement. Compliance Manager is responsible for the investigation and disposal of discrimination case. Based on wage records review, the facility provides the same pay for all employees for same work of similar nature.

Evidence examined:

Facility Policy.
Wage records of 26 out 26 selected samples.
Salary and other benefit records.
Interaction with management and Employees.

Any other comments:

Nil.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 65.0%	Female: 35.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	10 Women in Skilled roles.	
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"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	From review of records, facility tour, worker and management interview, there was no evidence of any form of discrimination.	
Professional Development		
What type of training and development are available for workers?	Safety training and machine operating training.	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

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:

Based on record review and employee's interview appointment letters issued to all 26 out of 26 selected employees.

Based on interaction with the facility management, it was noted that all employees are employed on regular basis and no casual, agency and apprentice employees were engaged.

Facility does not have any migrant workers.

Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process.

Evidence examined:

Facility Policy.

Salary and other benefit records.

Appointment letter with terms and conditions for 26 out 26 selected samples.

Interaction with management and Employees

Any other comments:

Nil.

Responsible Recruitment

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

Terms & Conditions presented

Understood by workers

Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

Yes No

Migrant Workers	
Type of work undertaken by migrant workers:	Facility does not have any migrant workers.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any migrant workers.
Is there any observation on this finding?	Not Applicable as facility does not have any migrant workers.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (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.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	No agency worker in the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any agency workers.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any agency workers.
Contractors (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.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any contract workers.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any contract workers.

8A - Sub-Contracting and Homeworking
[Summary of Findings]

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

Based on the interaction with the facility management and employee's interview, it was noted that the Facility is not using any sub-contractor and home workers.

Evidence examined:

Sub-contractor Policy and procedure.
Internal audit report.
Interaction with Management and Interview with employees.

Any other comments:

Nil.

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? Yes No

Summary of homeworking – if applicable

Is homeworking used at this site? Yes No

Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

10A - Entitlement to Work and Immigration
[Summary of Findings]

10A: Compliance Requirements

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

Based on the review of employee's time/ wage records and employee's interview, the facility has not employed any foreign nationals.
Based on the review of employee personal files, all the employees are holding the legal rights to work.

Evidence examined:

Interaction with Management and Employees.
Time/ wage records.
Personal files.

Any other comments:

Nil.

10B2 - Environment 2–Pillar
[Summary of Findings]

10B2: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The factory has established an Environmental policy review on dated 01.02.2024.
Compliance Manager is responsible for the environmental issued in the factory.
The company has done environment testing.

Evidence examined:

Pollution Consent for Air: 21551948 dated 28.03.2023 valid till 22.08.2025.
Pollution Consent for water: 21552006 dated 31.03.2023 valid till 22.08.2025.
Agreement done with J S Plastic on date 07.12.2021 valid up to 30.06.2026.
DG stack emission testing report No. SE1204003823/N dated 09.12.2023 by SIMA labs.
Air Quality testing report No. SE1204003723/N dated 09.12.2023 by SIMA labs.
Noise testing report No. SE1204003923/N dated 09.12.2023 by SIMA labs.

Any other comments:

Nil.

Attachments



[SEDEX Photo record.pdf](#)



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