

Sedex Members Ethical Trade Audit Report



| | Audit Details | | | | | | | | | |
|---|---|---|-------------|---|--|-------|---------------------------|----|--|--|
| Sedex Company Reference: (only available on Sedex System) | | | | Sedex Site Reference: (only available on Sedex System) | | | ZS416512846 | | | |
| Business name (Coname): | ompany | Aboni Te | extiles Ltd | | | | · | | | |
| Site name: | | Aboni Te | xtiles Ltd | | | | | | | |
| Site address: | | 169-171, Tetulzhora Hemayetpur, Savar Dhaka 1340 BD | | | Country: | | E | BD | | |
| Site contact and jo | act and job title: Mr. Shaikh Mrinmoy Zaman / Assistant Manager (HR, Admin and Complian | | | | | ince) | | | | |
| SMETA Audit Pilla | rs: | Standards | | Health and Safety (plus Environment 2-Pillar) | afety (plus 4-pillar vironment | | nvironment Busines Ethics | | | |
| Date of Audit: | | 2022-12-15 | | | | | | | | |
| | | | | | | | | | | |
| | | | Aud | it Comp | pany Name: | | | | | |
| | | | Inte | ertek B | angladesh | | | | | |
| | | | | | | | | | | |
| | | | Au | dit Con | ducted By | | | | | |
| Affiliate Audit Company | $\overline{\mathbf{A}}$ | | Purchaser | | | Ret | ailer | | | |
| Brand owner | | | NGO | | | Tra | de Uni | on | | |
| Multi-stakeholder | | | | | 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.

Version 6.1

(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: | Fuara Sultana | APSCA Number: | 21703441 | | |
| Additional Auditors: | | | | | |
| Date of declaration: | 2022-12-15 | | | | |

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. Shaikh Mrinmoy Zaman | | | |
| Title: | Assistant Manager (HR, Admin and Compliance) | | | |
| Date of declaration: | 2022-12-15 | | | |
| Comments: | None | | | |

Summary of Findings

| Issue | | Area of Non-Conformity | | mber of iss | ues | Findings |
|---|---|-----------------------------|----|-------------|-----|---|
| (please click on the issue title to go direct to the appropriate audit results by clause) | 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 | 2.1 | §1 | 1 | 0 | 0 | NC - ZAF600003555 |
| 3 - Working conditions are safe and hygienic | 3.1 3.1 3.1 3.1 3.1 3.1 3.1 | \$23 \$64 \$67 \$8 | 7 | 0 | 0 | NC - ZAF600003556 NC - ZAF600003557 NC - ZAF600003558 NC - ZAF600003559 NC - ZAF600003560 NC - ZAF600003561 NC - ZAF600003562 |
| 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 <u>allowed</u> | | | 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 | Bangladesh Labour Act 2006, section 179 (1-j) |
| §2 | Boiler Act 1923, Section 8. |
| §3 | Bangladesh Energy Regulatory Commission Act, 2003-Section 27(a) (1) |
| §4 | Bangladesh Labour Rules 2015, rule. 50 (1 and 5). |
| § 5 | Bangladesh Labour Rules 2015, Rule - 55 (8) |
| § 6 | Bangladesh Labour Law, 2006, section: 62(6) |
| §7 | Bangladesh Labour Law, 2006, section: 79 (e). |
| §8 | Building construction act 1952, Section 3. |

Site Details

| Site Details | | | | | |
|--|--|------------------------|--|--|--|
| Company Name | Aboni Textiles Ltd | | | | |
| Site Name | Aboni Textiles Ltd | | | | |
| GPS location (if available) | GPS Address: 169-171, Tetulzhora Hemayetpur, Savar Dhal 1340, Bangladesh. | | | | |
| | Coordinates: | 23.7934765, 90.2608104 | | | |
| Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Factory license: 11094/Dhaka 'G' category, issued by Deputy Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30th June 2023. Fire License 01: Fire License No: DD/Dhaka/14117//2011 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30th June 2023. Fire License 02: Fire License No: DD/Dhaka/27014/2017 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30th June 2023. Trade License: Trade License No: 000309, issued by Tetulzhora Union Parishad, which is valid till 30th June 2023. | | | | |
| Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc | All kinds of Knit fabrics | | | | |

Site description:

(Include size, location, and age of site. Also, include structure and number of buildings)

 The product manufactured at this site is all kinds of Knit fabrics. Aboni Textiles Ltd. is located at 169-171, Tetulzhora Hemayetpur, Savar, Dhaka1340 Bangladesh .The facility has started its operation in 2001. •There is another sister concern in the facility namely Aboni knitwear Ltd. Sister Concern Facility is with same management located at the facility premises. •All the employees are local (Bangladeshi •Overall responsibility for meeting the standards is taken by Mr. Shaikh Mrinmoy Zaman / Assistant Manager (HR, Admin and Compliance). •A total of 911 employees are working in the facility including 361 non-production employees. Out of 911 employees, all are male employees. •Total land area of the facility premises 2,30,928 square feet, production and warehouse area are 2,10,671 square feet and 45,000 square feet respectively. •All the employees are local (Bangladeshi). •The youngest worker on site was 20-year-old. •Facility has a Trade Union, Name: Aboni Textile Sromik Union, Reg. no: Dhaka- 5384. Trade Union member were present during the audit. Moreover, management informed that they would communicate the outcome of the audit to the workers through notice board and would discuss at next committee meeting •Site has no peak season. •Site uses no sub-contractors. •Facility has 100% fixed employees •Fcility works in three shift, (Shift-A: 06:00am – 02:00 pm, Shift-B: 02:00 pm – 10:00 pm and Shift-C: 10:00 pm – 06:00 am) including an hour of meal break. •Standard working hours on site was in average 208 hours/month with 1 day off in every 7-day-period. • Legal minimum pays (BDT 8000.00) were paid to all employees and facility provides minimum wage as per Bangladesh Government Gazette dated 24th January 2019. •Correct Overtime hours were paid; Employees were paid 200% of minimum hourly wage for Overtime. •Employee's wages are calculated monthly. The payment method of the salary is cash on hand within 7 working days of following month and the payment cycle is 1 to 30/31. •Audit scope is 01 year (from December 2021 to November 2022). •Audit sample is 42 according to the manpower of the facility. •42 Records to show wages and hours were taken from November 2022 (Current paid month), August 2022 (Random month) & February 2022 (Random Month). •42 employees were selected for interview; they were interviewed as 06 groups of 05 and 12 employees were interviewed individually.

| Structure and number of buildings | Building Name: | | Security B Unit | uilding (01) Knitting | |
|-----------------------------------|----------------|---------------------------------|---------------------------|-------------------------------|--|
| | Floor | Descriptio | n | Remark | |
| | Ground | Security B | uilding | Knitting Unit | |
| | Building Name: | | Old Utility Building (02) | | |
| | Floor | Descriptio | n | Remark | |
| | Ground | ETP Outle | t Area | None | |
| | Mazzanine | Empty Pla | ce | None | |
| | 1st | Fabric Sto | rage | None | |
| | 2nd | Fabric Sto | rage | None | |
| | Building Name: | | ETP Build | ing 03 | |
| | Floor | Descriptio | n | Remark | |
| | Ground | office/ETF | P Lab | None | |
| | Building Name: | | New Utility | / Building 04 | |
| | Floor | Descriptio | n | Remark | |
| | Ground | Generator Substatior Pane | enerator, Commonly | | |
| | 1st Floor | Laboratory Boiler | , EGB | Commonly use | |
| | 2nd Floor | 2nd Floor Office & ac store | | Commonly use | |
| | Building Name: | | Utility Buil | ding 02 (Knitting Unit) | |
| | Floor | Descriptio | n | Remark | |
| | Ground | Utility | | Knitting Unit | |
| | Building Name: | | Shed 01 | | |
| | Floor | Descriptio | n | Remark | |
| | Ground | Medical C Others | enter/ | None | |
| | Building Name: | | Shed 02 | | |
| | Floor | Descriptio | n | Remark | |
| | Ground | Child Care and Other | | None | |
| | Mazzanine | Office | | None | |
| | Building Name: | | Shed 01 (I | Knitting Unit) | |
| | Floor | Descriptio | n | Remark | |
| | Ground | Yarn Store | • | Used by Aboni Knitwer Ltd. | |
| | Building Name: | | Shed 02 (I | Knitting Unit) | |
| | Floor | Descriptio | n | Remark | |
| | Ground | Production | n floor | Used by Aboni Knitwer Ltd. | |

| | Building Name: | | Main Shed | d 05 | | |
|--|---|----------------------|-------------|-------------------------------|--|--|
| | Floor | Description | n | Remark | | |
| | Ground | Production | n Floor | Used by Aboni Textile Ltd. | | |
| | Mazzanine | Office Ro | om | Used by Aboni Textile Ltd. | | |
| | Building Name: | | Shed 06 | | | |
| | Floor | Description | n | Remark | | |
| | Ground | Dyeing Ch Storage | nemical | Used by Aboni Textile Ltd. | | |
| | Building Name: | | Shed 07 | | | |
| | Floor | Description | n | Remark | | |
| | Ground | Finishing & Chemical | | Used by Aboni Textile Ltd. | | |
| | Building Name: | | Shed 08 | | | |
| | Floor | Description | n | Remark | | |
| | Ground | Boiler & C | ompreser | Commonly use | | |
| | Building Name: | | Shed 09 | | | |
| | Floor | Description | n | Remark | | |
| | Ground | Pump Roc | om | Commonly use | | |
| | Building Name: | | Shed 10 | 0 | | |
| | Floor | Description | n | Remark | | |
| | Ground | Wastage | | Commonly use | | |
| | Building Name: | | Shed 11 | | | |
| | Floor | Description | n | Remark | | |
| | Ground | Storage Fa | abric | Used by Aboni Textile Ltd. | | |
| | Building Name: | _ | Knitting Bu | uilding 06 | | |
| | Floor | Description | n | Remark | | |
| | 6th floor | Dining & C Others | Canteen/ | Commonly use | | |
| Visible structural integrity issues (large cracks) observed? | ☐ Yes ☑ No | | | | | |
| CIACKS) ODSELVEU! | Please give details: | | | | | |
| | No such cracks were found during audit | | | | | |
| Does the site have a structural engineer | ☑ Yes □ No | | | | | |
| evaluation? | Please give details: | | | | | |
| | Site have a structural engineer evaluation, by Tetuljhora Union Parishad on 17 August 2008. And Machine lay out evaluation by Department of Inspection for Factories and Establishments (DIFE) on 11 February 2019. | | | | | |

| Site function | ☐ Agent | | | | | |
|---|--|-------------------------------|--|--|--|--|
| | ☑ Finished Product Supplier | □ Grower | | | | |
| | ☐ Homeworker | □ Labour Provider | | | | |
| | ☐ Pack house | □ Primary Producer | | | | |
| | ☐ Service Provider | □ Sub-contractor | | | | |
| Months of peak season | Select a month to Select a month | | | | | |
| Process overview | Product Manufactured: All kinds of Knit fabrics Main production process: Kniting, Batch, dyeing, Laboratory, finishing, QC, Store. Production Capacity: 20 tons per month. Production Lines: NA Machines used: Dyeing M/C, Sample Dryer, 'Air Turning M/C, 'Color Mateching Cabinet, Color Mixture M/C, 'Roll Opening M/c, Gas Dryer M/C, Bag Sewing M/C, Finish Febric Inspection Machine, Sewing M/C, Gas Generator, Gas Boiler, Worthington Air Compressor, Electrolux Wascator, Motorized Crock Meter, Manual Wrap Reel, Conditioning Cabinate M/C. Chemical used: Ablusoft AWS-P,Acetic Acid,Aeron Extra,Alba, ECO,Alba FRD-T,Albaflow JET,Albatex AB-45,Albatex RI,Applicat PQ,Applizyme NU,Base Macro MAW,Base WHI-Z,Biocon CRO 100,Biolase APC,Biotex NAHY,Biotex Nela,Caustic Soda Flake 98.5% (Strong Alkali),Coat Blue S45,Cottonese BT11,Cottonese BW NC,Croscolor ADM,Croscolor BCSR,CWT-3001,CWT-3007,Denova Speedy ECO-X,Dyeing Acid GN-A,Eco Clean RMX,Enzyme FC-MS,Eriopon OS,Fluffy Pearl FF-CWS,Fluro BS,Grease,Huestab HP,Huewash R,Hydrogen Peroxide (H2O2) 50% (Bleaching Agent),Hyperoxy Catalase T100,Hydroulic Oil,Invalon DAM,Marla WT-OLS,Mobil,NC Acid PH-45N,Neo,RP-5600,Noamin LST/40,Novafast BHT/M,Novofil TNC liq,NovoLube Pan/200,Novo FF_25,Oxalic Acid,Permacol OP/BD,Permacol SGL,Persoft UNN,AQ-09 (Non-lonic),Primagreen Power Finish,Quick-neut ORG Liquid,ReactEVO TWE Conc,ReactEVO WBS,Schwatt UV-120SK-BT,Soda Ash Light (Mild Alkali),Sodium Acetate,Sodium Bicarbonate,Sodium Chloride,Sodium Hydro Sulphite(China),Sodium Sulphate (Electrolyte),Solusoft NMW liq c,Solusoft NUP liq,Sulphuric Acid,Sunsolt RM-340 CK,Texport AC- | | | | | |
| What form of worker representation is there on site? | ☑ Union | ☐ Worker Commitee | | | | |
| on site: | □ Other | □ None | | | | |
| Please give details: | Facility has a Trade Union, Name Reg. no: Dhaka- 5384. | : Aboni Textile Sromik Union, | | | | |
| Is there any night production work at the site? | ☑ Yes □ No | | | | | |
| Are there any on site provided worker accommodation buildings | ☐ Yes ☑ No | | | | | |
| | Please give details: | | | | | |
| Are there any off site provided worker accommodation buildings | ☐ Yes ☑ No | | | | | |
| accommodation buildings | Please give details: | | | | | |
| Were all site provided accommodation buildings included in this audit | ☐ Yes ☑ No | | | | | |
| 9 | Please give details: | | | | | |
| | Not applicable | | | | | |

Audit company: Intertek Bangladesh Report reference:

Date:

ZAA600000320 2022-12-15

| Audit Parameters | | | | | |
|---|---|-------|--|--|--|
| Time in and time out | Day 1 | | | | |
| | In | 09:40 | | | |
| | Out | 17:10 | | | |
| 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. Shaikh Mrinmoy Zaman / Assistant Manager (HR, Admin and Compliance) | | | | |
| Is further information available | No | | | | |

| Audit attendance | Management | Worker Representatives | | | | |
|---|---|----------------------------------|--------------------------|--|--|--|
| | Senior management | Worker Committee representatives | Union representatives | | | |
| A: Present at the opening meeting? | Yes | No | Yes | | | |
| B: Present at the audit? | Yes | No | Yes | | | |
| C: Present at the closing meeting? | Yes | No | Yes | | | |
| Reason for absence at the opening meeting | There is a trade union in thi opening & closing meeting. | s facility. And Trade Union m | ember was present during | | | |
| Reason for absence during the audit | There is a trade union in this facility. And Trade Union member was present during opening & closing meeting. | | | | | |
| Reason for absence at the closing meeting | There is a trade union in this facility. And Trade Union member was present during opening & closing meeting. | | | | | |

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 | |
| | Permanent | Temporary | Agency | Permanent | Temporary | Agency | workers | Total |
| Worker numbers – male | 550 | 0 | 0 | 0 | 0 | 0 | 0 | 550 |
| Worker numbers – female | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 550 | 0 | 0 | 0 | 0 | 0 | 0 | 550 |
| Number of Workers interviewed – male | 42 | 0 | 0 | 0 | 0 | 0 | 0 | 42 |
| Number of Workers interviewed – female | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total – interviewed sample size | 42 | 0 | 0 | 0 | 0 | 0 | 0 | 42 |

| Nationalities Structure | | | |
|--|--|----------------|--|
| Nationality of Management | Bangladeshi | | |
| Please list the nationalities of all workers, with the three most common nationalities listed first. | Nationaility 1: Bangladeshi | approx %: 100% | |
| Was this list completed during peak season? | ☐ Yes ☑ No Please give details: Site has round the year same production process. | | |
| | | | |
| 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: | Not applicable | |

| Worker Interview Summary | | | | |
|---|--|--|--|--|
| Were workers aware of the audit? | ☑ Yes □ No | | | |
| Were workers aware of the code? | ☑ Yes □ No | | | |
| Number of group interviews: | 30 | | | |
| Number of individual interviews: | Male: 12 Female: 00 | | | |
| 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. | ☑ Yes □ No Please give details: | | | |
| Interviews were done in private and the confidentiality of the interview process was communicated to the workers? | ☑ Yes □ No | | | |
| In general, what was the attitude of the workers towards their workplace? | ☑ Favorable ☐ Non-favourable ☐ Indifferent | | | |
| What was the most common worker complaint? | None | | | |
| What did the workers like the most about working at this site? | Overtime is fully voluntary, Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved. | | | |
| Any additional comment(s) regarding interviews: | Most employees enjoyed working at this facility, they felt they had sufficient wage and had a good relationship with management in general | | | |
| Attitude of workers to hours worked: | Very favourable as total working hour is within their limit and overtime is fully voluntary. | | | |
| Is there any worker survey information available? | ☐ Yes ☑ No Please give details: | | | |

Attitude of workers:

The employees were generally positive about their workplace; 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 felt free to leave this employer and understood the notice period required. The facility management treated them with respect. Employees are able to complain directly to their welfare officer, compliance responsible person or line manager and also felt free to give their general concerns to their management representative.

Attitude of worker's committee/union reps:

The Trade union members were positive about the facility and looking forward to developing relationships with the management team. Trade union members' interviews were conducted privately in a separate place. The Trade union members replied naturally regarding their responsibilities as Trade union member, and they also informed that they can easily carryout their daily job without any difficulties.

Attitude of managers:

The facility management showed a positive attitude to this audit and during the whole audit Mr. Shaikh Mrinmoy Zaman / Assistant Manager (HR, Admin and Compliance) along with his team was present through the audit process and co-operated the whole audit. Facility management respected clients' requirement and allowed auditors to take photographs of all production process, best practices and also non-conformities. They also provided photocopy of required documents 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 factory management had a system in place to check their current practices against their clients' 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.

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
- 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 Mr. Shaikh Mrinmoy Zaman / Assistant Manager (HR. Admin and Compliance)
- The facility has policy and procedures for human rights.
- •The facility communicates this code of conduct to the employees through notice board and orientation training.
- •It is communicated to all appropriate parties, including suppliers through the responsible person.

Evidence examined:

Any other comments:

- Facility code of conduct.
- •Written policies and procedure that being provided individually to employees.
- •Management, employee training / meeting records.
- Last orientation training was held on 17 November 2022 with 23 members.

None Policy statement that expresses ☑ Yes □ No commitment to respect human rights? Please give details: The facility has a social compliance policy which is a commitment to respect human rights.

Does the business have a designated ☑ Yes □ No person responsible for implementing standards concerning Human Rights?

| Please | avin | detaile | 2 |
|--------|------|---------|---|

The facility has a designated person who responsible for implementing standards concerning Human Rights. Name: Mr. Shaikh Mrinmoy Zaman / Assistant Manager (HR, Admin and Compliance)

Audit company: Report reference:

Intertek Bangladesh

Date:

| Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the | ☑ Yes □ No |
|---|---|
| | Please give details: |
| reporter? | The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system. |
| Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement) | ☑ Yes □ No |
| Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? | ✓ Yes □ No |
| information, which is implemented? | Please give details: |
| | The facility uses software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety |
| Me | asuring Workplace Impact |
| Annual worker turnover(Number of workers | Last year 4% |
| leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)) | This year 4% |
| 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% |
| Annual % absenteeism(Number of days lost | Last year 2% |
| 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) | This year 3% |
| 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) | 3% |
| Are accidents recorded? | ☑ Yes □ No |
| | Please give details: |
| | All the minor and major injuries are recorded in an injury register. Last injury was on 07 December 2022. Which was minor pressure injury in left hand by trauly. |
| Annual Number of work related accidents | Last year 0% |
| and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers) | This year 0% |

Audit company:
Intertek Bangladesh

Report reference: ZAA600000320

Date:

| 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% | |
|--|-----------|----|
| Lost day work cases per 100 | Last year | 0% |
| workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers) | This year | 0% |
| % of workers that work on average more | 6 month | 0% |
| than 48 standard hours / week in the last 6 / 12 months | 12 month | 0% |
| % of workers that work on average more than 60 total hours / week in the last 6 / 12 months | 6 month | 0% |
| | 12 month | 0% |

0B - Management Systems and code Implementation [Summary of Findings]

0B: 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:

- •Responsibility for meeting the legal and client code requirements is taken Mr. Shaikh Mrinmoy Zaman / Assistant Manager (HR, Admin and Compliance)
- •The facility communicates this Code to all employees by training as confirmed by training records and employee interviews
- •The ETI based code was posted on-site for employee's review.
- •The facility had set up policy and pointed one staff to update labour law requirements.
- •Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- •Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- •Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.
- •The facility conducts orientation training for all new employees.

Evidence examined:

- •Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- Meeting records.
- Internal audit records
- Management, employee training / meeting records

| Any otner con | nments: |
|---------------|---------|
|---------------|---------|

None

| Management Systems | | |
|--|--|--|
| In the last 12 months, has the site been subject to any fines/prosecutions for | ☐ Yes ☑ No | |
| non-compliance to any regulations? | Please give details: | |
| | The site has not been subject to any fines/prosecutions for non–compliance to any regulations in the last 12 months. | |
| Do policies and/or procedures exist that reduce the risk of forced labour, child | ☑ Yes □ No | |
| labour, discrimination, harassment & abuse? | Please give details: | |
| | It was noted through documentation review that facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse. | |

Audit company:
Intertek Bangladesh

Report reference:

Date:

| If Yes, is there evidence (an indication) of effective implementation? Please give details. | Facility provides training on forced labour, child labour, discrimination, harassment & abuse on monthly basis to the management level employees. Moreover, no forced labour, child labour, discrimination, harassment & abuse was found during facility tour and employee interview. |
|---|---|
| Have managers and workers received training in the standards for forced labour, | ☑ Yes □ No |
| child labour, discrimination, harassment & abuse? | Please give details: |
| abuse: | Managers were provided training for forced labour, child labour, discrimination, harassment & abuse on Mid-level Management training. Last Mid-level Management training was held on 15 November 2022 with 22 participants and conducted by Sr. officer HR Admin Compliance |
| If Yes, is there evidence (an indication) that training has been effective e.g. training | ☑ Yes □ No |
| records etc.? Please give details | Please give details: |
| | Training records were found including picture and attendance sheet. |
| Does the site have any internationally recognised system certifications e.g. ISO | ☑ Yes □ No |
| 9000, 14000, OHSAS 18000, SA8000 (or | Please give details: |
| other social audits)? | Facility has RCS (Validity till 08 March 2023), OCS (Validity till 08 March 2023), HIGG (Validity till 12 July 2023), SLCP (Validity date till 28 June 2023), Okkotex (Validity date till 31 December 2022) |
| Is there a Human Resources | ☑ Yes □ No |
| manager/department? | The facility has a 04 -member team in Human Resource department which is headed by Mr. Shaikh Mrinmoy Zaman – Ass. Manager, HR, admin & Compliance. |
| Is there a senior person /manager responsible for implementation of the code? | ☑ Yes □ No |
| responsible for implementation of the code: | Please give details: |
| | Mr. Shaikh Mrinmoy Zaman – Ass. Manager, HR, admin & Compliance. |
| Is there a policy to ensure all worker information is confidential? | ☑ Yes □ No |
| aniematen ie eemidentaar. | Please give details: |
| | The facility has an IT security policy which ensures worker information is confidential. |
| Is there an effective procedure to ensure confidential information is kept confidential? | ☑ Yes □ No |
| | Please give details: |
| | The facility has an effective key control procedure to keep the information confidential. |
| Are risk assessments conducted to evaluate policy and procedure | ☑ Yes □ No |
| effectiveness? | Please give details: |
| | Facility's risk assessment was according to law. Last risk assessment was conducted on 01 January 2022. |

Audit company: Intertek Bangladesh Report reference:

Date:

| Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks? | ☑ Yes □ No |
|---|--|
| | Please give details: |
| | The facility has an internal system to raise the issue found in risk assessment and to implement the way of reducing it. |
| Does the facility have a policy/code which require labour standards of its own | ☑ Yes □ No |
| suppliers? | Please give details: |
| | Facility has a supplier selection policy which ensures labour standard of its own supplier. |
| | Land Rights |
| Does the site have all required land rights licenses and permissions (see SMETA | ☑ Yes □ No |
| Measurement Criteria)? | Please give details: |
| | The facility has all the required licenses and permissions as per legal requirements. |
| Does the site have systems in place to conduct legal due diligence to recognize | ☑ Yes □ No |
| and apply national laws and practices | Please give details: |
| relating to land title? | the facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title. |
| Does the site have a written policy and procedures specific to land rights? | ☐ Yes ☑ No |
| procedures specific to failu rights: | Please give details: |
| | Facility does not have written policy and procedures specific to land rights. |
| Is there evidence that facility/site compensated the owner/lessor for the land | ☑ Yes □ No |
| prior to the facility being built or expanded? | Please give details: |
| | The facility has ownership of the building maintaining all legal procedure and no expansion was conducted. |
| Does the facility demonstrate that alternatives to a specific land acquisition | ☑ Yes □ No |
| were considered to avoid or minimize adverse impacts? | Please give details: |
| | The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts. |
| Is there any evidence of illegal appropriation of land for facility building or | ☐ Yes ☑ No |
| expansion of footprint? | Please give details: |
| | No illegal appropriation of land for facility building or expansion of footprint. |

Audit company: Intertek Bangladesh Report reference:

Date:

ZAA600000320

2022-12-15

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 also available for review.
- •Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- •Overtime is voluntary.

None

- •The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- •Work tools, PPE, IC/staff card, training, etc. are provided without payment.
- •The facility does not implement prison labour.

The above was confirmed in management and employee interview. Evidence examined: Facility policy and procedure Sample employee personal files. Service book Employee hand book Any other comments:

| Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, | ☐ Yes ☑ No |
|---|--|
| please give details and category of workers affected) | Please give details: |
| Is there any evidence of a loan scheme in operation (If yes, please give details and | ☐ Yes ☑ No |
| category of workers affected) | Please give details: |
| Is there any evidence of retention of wages / deposits (If yes, please give details and | ☐ Yes ☑ No |
| category of workers affected) | Please give details: |
| Are there any restrictions on workers' freedom to terminate employment? | ☐ Yes ☑ No |
| , | Please give details: |
| | Facility has a policy mentioning Workers are free to terminate employment from the facility. |
| If any part of the business is UK based or registered there & has a turnover over | ☐ Yes ☐ No ☑ Not Applicable |
| £36m, is there a published a 'modern day slavery statement? | Please give details: |
| Slavery Statement: | Yearly production turnover is 41 million USD. |

Audit company:
Intertek Bangladesh

Report reference:

Date:

| Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day? | ☐ Yes ☑ No |
|--|--|
| | Please give details: |
| | The employees can leave their workplace after their respective duties. |
| Does the site understand the risks of forced / trafficked / bonded labour in its supply | ☑ Yes □ No □ Not Applicable |
| chain | Please give details: |
| | Facility has established forced labour and bonded labour policy; even though they have no such type of labour |
| Is the site taking any steps taking to reduce the risk of forced / trafficked labour? | ☑ Yes □ No |
| the risk of forced / trafficked labour : | Please give details: |
| | The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs. |

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:

- All the employees are allowed to form or join the trade union of their own choice.
- •There is one trade union in the facility (Name: Aboni Textile Sromik Union), Reg. no: Dhaka- 5384
- •Trade Unions were elected on 30 April 2019
- •There are 07 members in the trade union.
- •Trade Union members are not treated less favourably than other workers and are allowed to carry out their duties within working hours without affecting their remuneration.

Evidence examined:

- Freedom of association policy review.
- Trade Union registration document.
- Trade Union formation records
- •Trade Union member interview.
- Trade Union meeting attendance register

| Any | other | commer | its: |
|-----|-------|--------|------|
|-----|-------|--------|------|

None

| What form of worker representation/union is | ☑ Union | ☐ Worker Commitee |
|---|--|--|
| union or committee in the textbox) | □ Other | □ None |
| Other details: | Union (name) Aboni Textile Sromi | ik Union), Reg. no: Dhaka- 5384 |
| Is it a legal requirement to have a union? | ☐ Yes ☑ No | |
| Is it a legal requirement to have a worker's committee? | ☑ Yes □ No | |
| Is there any other form of effective worker/management communication | ☑ Yes □ No | |
| Other details: Is it a legal requirement to have a union? Is it a legal requirement to have a worker's committee? | Please give details: | |
| | Facility has an effective grievance can submit their grievance verball officer or complaint box. | handling procedure. Workers y or in written through welfare |
| Is there evidence of free elections? | ☐ Yes ☑ No | |

Audit company: Intertek Bangladesh Report reference:

Date:

| Does the supplier provide adequate facilities to allow the Union or committee to | ☑ Yes □ No |
|---|---|
| conduct related business? | Please give details: |
| | Facility has a policy regarding Freedom of Association. The union members are involved in the development part of the facility. Besides, facility conducts regular meetings with the members of trade unions and the meeting minutes were communicated with the workers through notice board |
| Name of union and union representative, if applicable: | Aboni Textile Sromik Union, Reg. no: Dhaka- 5384 |
| Is there evidence of free elections? | ☑ Yes □ No □ Not Applicable |
| If there is no union, is there a parallel means of consultation with workers e.g. worker committees? | Not applicable. |
| Is there evidence of free elections? | ☐ Yes ☐ No ☑ Not Applicable |
| Are all workers aware of who their representatives are? | ☑ Yes □ No |
| representatives are: | Please give details: |
| | Trade Union members name with picture are posted in the notice board. |
| Were worker representatives freely elected? | ☑ Yes □ No |
| Date of last election: | 2019-04-30 |
| Do workers know what topics can be raised with their representatives? | ☑ Yes □ No |
| Were worker representatives/union representatives interviewed? | ☑ Yes □ 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. | The formation of the trade union held on 30 April 20219 Each meeting of trade union is conducted with two-month interval as per Bangladesh local law, Last meeting was on 15 October 2022 and the agenda were-1.Discuss about about Winter wear distributions. 2.Discuss about next election of trade union 3.Others. |
| Are any workers covered by Collective Bargaining Agreement (CBA)? | □ Yes ☑ No |

Audit company: Intertek Bangladesh Report reference:

Date:

ZAA600000320 2022-12-15

| | Non-C | ompliance | | Evidence | |
|-----------------------------------|--|---|---------------------------------------|----------|--|
| [Back to findings s | summary] | | | | |
| | Non-C | ompliance | | | |
| Reference | ZAF600003555 | | | | |
| Clause | 2 - Freedom of A Bargaining are R | Association and Rig Respected | ght to Collective | | |
| Issue Title | local laws includ | 134 - Unions are not in compliance with the national / local laws including their formation, operation, registration, recruitment of members, collection of fees, etc. | | | |
| Subcategory | Trade Union | | | | |
| New or carried over? | ☑ New | □ C | arried Over | | |
| Root cause | ☐ Training | □ S; | ystem | | |
| | □ Costs | □ La | ack of workers | | |
| | ☑ Other | | | | |
| Root cause - Other | Lack of awarene | SS | | | |
| ETI code or local law issue | Bangladesh Lab | our Act 2006, sect | ion 179 (1-j) | | |
| Explanation to the non compliance | and Union repre- trade union expiral election of office members shall n | It was noted through documents review, management, and Union representative interview that, the validity of trade union expired on 30 April 2021. As per law the election of officers of the trade union by its general members shall not be more than 02 years. Note that, last election was conducted on 30 April 2019. | | | |
| Follow up method | ☐ Follow up au | dit ☑ D | esktop audit | | |
| Timescale | □ Immediate | □ 30 days | □ 60 days | | |
| | ☑ 90 days | ☐ 120 days | ☐ 180 days | | |
| | □ 365 days | □ Other | | | |
| Actions | It is recommende general member | ed that the Trade us should held after | union election by its reach 02 years. | | |

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:

1. General Health and Safety management

- •Mr. Sayed Md. Azizur Rahman GM, Head of Textile, looks after Health & Safety issues for the site.
- Ventilation, temperature, and lighting were adequate for the production processes.
- •Potable water was freely available in all areas and Last test done on 08 November 2021 by Department of Public Health Engineering
- Sufficient clean toilets are available.
- •Minutes of meetings show that there is monthly H&S committee meeting. Last meeting on 14 November 2022 with 08 participants.

Fire Safety

- •There are 02 or more exit in each room.
- •Firefighting equipment was adequate, and checks were up-to-date. Facility checked all fire equipment monthly schedules wise. Last fire equipment test was on 08 December 2022.
- •The facility management posted the evacuation plans on every production floors/ shed with local language.
- •Public Address system, fire hose found active throughout the facility.
- Facility has a firefighting team of 106 members, most of them are trained by Fire Service & Civil Defence authority. Some of the members had training internally.
- •Facility has several fire safety equipment including but not limited to DCP extinguisher, CO2 extinguisher, foam extinguisher, helmet, bucket, blanket, stretcher, fire bitter, fire hook, lock cutter, gas mask, eye goggles, fire alarm control panel, smoke- heat -multi detectors, manual call point, sounders, hose pipe etc.
- 3. Electrical, Machine & fire safety
- •All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse
- Facility has 03 electrician who checks and does inspection, roster wise for whole facility.
- •Facility checks all electric channels, electrical distribution board and electric connection daily and monthly schedule wise.
- 4. Chemical safety
- •Facility uses hazardous chemicals for their production process maintaining safety measures.
- •Material Safety Data Sheets were found for all other chemicals.

Medical services

- •There were 11 first aid boxes with sufficient kits in the full facility.
- There were 33 internal first aid certified responders.
- •Facility has 02 appointed Doctor 01 Nurse and 02 Medical assistant who are available in working time of the facility. They also arranged monthly first aid training with first aider.
- •In the medical room they have more than 02 beds segregated for male and female.

Dormitory

•Facility didn't provide dormitory facilities to any employees.

7. Facility provide bellow training to employees:

Training TypeLast Date of trainingParticipantTrainer DesignationFrequency of training Orientation Training to factory rules 17-11-2022 23HR, Admin ComplianceAs required

Fire Fighting Training (Internal)24-11-202211Fire Safety OfficerAs required

Fire Fighting Training (Internal)24-11-2022111 lie Salety OfficerAs required Fire Fighting Training (External)05&6-07-202240Warehouse InspectorAs required First Aid Training22-11-202209DoctorAs required PPE Training17-11-202223HR, Admin ComplianceAs required

Mid-level management Training15-11-202222Sr. officer HR Admin ComplianceAs required Health & Safety Training24-11-202211 DoctorAs required

Chemical Handling Training21-11-202209Environment officerAs required

Wastage handling Training27-11-202218ASS. Manager AdminAs required

Evidence examined:

| •License review: Fire license |
|---|
| •Building approval plan |
| •Group insurance |
| •Water test report |
| •Injury record and analysis report |
| Machine and electric maintenance record |
| •Risk assessment report |
| •Training record: Fire training, First aid training, PPE training, Health and safety training |
| •Fire drill record |
| •Health and safety committee record |
| •Electric installation checking record |
| •Training records and certificates |
| •Fire equipment maintenance records |
| •Accident reports |
| Chemical list and MSDS for each chemical |
| •Health and safety policy |
| •Potable water testing certificates |
| Any other comments: |
| None |
| |

| Does the facility have general and occupational Health & Safety policies and | ☑ Yes □ No |
|--|---|
| procedures that are fit for purpose and are these communicated to workers? | Please give details: |
| these communicated to workers? | The facility has general health & safety and Occupational Health & Safety policy and procedures which are fit for purposes and these policies are communicated through orientation training. |
| Are the policies included in workers' | ☑ Yes □ No |
| mandale. | Please give details: |
| | The facility provides workers manual to the workers where all the policies and applicable govt. law are included. |
| Are there any structural additions without | ☐ Yes ☑ No |
| added)? | Please give details: |
| | No additional structures were found without building construction approval. |
| Are visitors to the site informed on H&S and provided with personal protective | ☑ Yes □ No |
| equipment? | Please give details: |
| | All the visitors to the site are informed on H&S and provided with personal protective equipment where necessary |
| Is a medical room or medical facility | ☑ Yes □ No |
| evidence to support system description | Please give details: |
| Are the policies included in workers' manuals? Are there any structural additions without required permits/inspections (e.g. floors added)? Are visitors to the site informed on H&S and provided with personal protective equipment? Are visitors to the site informed on H&S and provided with personal protective equipment? 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)) Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid? Plea | The facility has medical facility for the employees. Equipment's are provided as per legal requirements. |
| | ☑ Yes □ No |
| | Please give details: |
| | Facility has 02 appointed Doctor 01 Nurse and 02 Medical assistant who are available in working time of the facility. They also arranged monthly first aid training with first aider. Last training was on 22 November 2022 with 09 participants. |

Audit company: Report reference: Date:

| Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles? Is secure personal storage space provided for workers in their living space and is fit for purpose? 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? Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources? Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals? | ☐ Yes ☑ No |
|--|--|
| operated by competent persons e.g. buses | Please give details: |
| and other vehicles? | Facility has no transport facilities. |
| | ☑ Yes □ No |
| | Please give details: |
| | The facility provides personal storage space for all the employees, and they are fit for purposes. |
| | ☑ Yes □ No |
| workers doing overtime e.g. driving after a | Please give details: |
| | Risk assessment was conducted according to law. Last risk assessment was conducted on 01 January 2022. |
| | ☑ Yes □ No |
| required permits for use and disposal of | Please give details: |
| natural resources? | The facility management has conducted noise and air quality assessment as required by law. The assessments were done by Greenbud on 12 January 2022. |
| | ☑ Yes □ No |
| (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk? Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources? Is the site meeting its customer requirements on environmental standards, | Please give details: |
| | The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc. |

| | Non-C | ompliance | | Evidence | |
|-----------------------------------|---|---|--|----------|--|
| [Back to findings s | summary] | | | | |
| | Non-C | ompliance | | | |
| Reference | ZAF600003556 | | | | |
| Clause | 3 - Working Con | ditions are Safe ar | nd Hygienic | | |
| Issue Title | 268 - Lapses in i | inspections / maint ion or otherwise, e | tenance of machiner .g. boilers) | гу | |
| Subcategory | Machinery | | | | |
| New or carried over? | ☑ New | □ C: | arried Over | | |
| Root cause | ☐ Training | □ Sy | ystem | | |
| | □ Costs | □ La | ack of workers | | |
| | ☑ Other | | | | |
| Root cause - Other | Lack of awarene | ess | | | |
| ETI code or local law issue | Boiler Act 1923, | Section 8. | | | |
| Explanation to the non compliance | It was noted through documents review and management interview that, 01 out of 03 boiler license found expired dated on 17 November 2022. However, facility found applied for one boiler license on 17 November 2022 but has not get the updated license yet. | | | | |
| Follow up method | ☐ Follow up au | dit ☑ De | esktop audit | | |
| Timescale | ☐ Immediate | □ 30 days | ☑ 60 days | | |
| | ☐ 90 days | ☐ 120 days | ☐ 180 days | | |
| | ☐ 365 days | □ Other | | | |
| Actions | It is recommended collect the renew legal requirement | ed that facility show al copy of the boil at. | uld follow up and er license as per | | |

| | Non-C | ompliance | | Evidence |
|-----------------------------------|--|--|---|----------|
| [Back to findings s | ummary] | | | |
| | Non-C | ompliance | | |
| Reference | ZAF600003557 | | | |
| Clause | 3 - Working Con | ditions are Safe an | nd Hygienic | |
| Issue Title | 646 - No permits requirements | for use of energy | as per legal | |
| Subcategory | Energy usage | | | |
| New or carried over? | ☑ New | □ Ca | arried Over | |
| Root cause | □ Training | □ Sy | vstem | |
| | □ Costs | □ La | ick of workers | |
| | Other | | | |
| Root cause - Other | Lack of awarene | ss | | |
| ETI code or local law issue | Bangladesh Ene Section 27(a) (1) | rgy Regulatory Co | mmission Act, 2003- | |
| Explanation to the non compliance | management into Captive Power F (Bangladesh End However, facility June 2022, but h Note that facility | las not get the upd had 04 generators city of 3.260 MW (| has not collected from BERC ommission). neern authority on 29 ated license yet. | |
| Follow up method | □ Follow up au | dit ☑ De | esktop audit | |
| Timescale | □ Immediate | □ 30 days | □ 60 days | |
| | ☑ 90 days | ☐ 120 days | ☐ 180 days | |
| | ☐ 365 days | □ Other | | |
| Actions | It is recommende collect the CPP I | ed that facility shou icense as per lega | uld follow up and I requirement. | |

| | Non-Com | pliance | | Evidence | |
|-----------------------------------|---|-----------------|---|----------|--|
| [Back to findings s | ummary] | | | | |
| | Non-Com | pliance | | | |
| Reference | ZAF600003558 | | | | |
| Clause | 3 - Working Condition | ons are Safe ar | nd Hygienic | | |
| Issue Title | 299 - No/ inadequate availability of clean drinking water (that meets the World Health Organisation standard for potable water) | | | | |
| Subcategory | Worker Health | | | | |
| New or carried over? | ☑ New | □ Ca | arried Over | | |
| Root cause | ☐ Training | □ Sy | /stem | | |
| | □ Costs | □ La | ack of workers | | |
| | ☑ Other | | | | |
| Root cause - Other | Lack of awareness | | | | |
| ETI code or local law issue | Bangladesh Labour | Rules 2015, ru | lle. 50 (1 and 5). | | |
| Explanation to the non compliance | It was noted through site visit, documents review and management interview that, a) facility has not tested drinking water within one year to ensure if the parameter is in limit or not. Note that, facility has tested last drinking water on 08 December 2022. However, facility has applied to the concern authority for new test on 28 November 2022. b) 01 drinking water point at dyeing section found unhygienic. | | | | |
| Follow up method | ☐ Follow up audit | ☑ De | esktop audit | | |
| Timescale | ☐ Immediate | ⊒ 30 days | □ 60 days | | |
| | ☑ 90 days I | □ 120 days | ☐ 180 days | | |
| | □ 365 days I | □ Other | | | |
| Actions | It is recommended to once in a year, also water point. | | uld test drinking wate hygiene in drinking | r | |

| Non-Compliance | | | Evidence | |
|-----------------------------------|--|---------------------|----------------------|---|
| [Back to findings summary] | | | | |
| | Non-C | ompliance | | |
| Reference | ZAF600003559 | | | 7 |
| Clause | 3 - Working Con | ditions are Safe ar | nd Hygienic | |
| Issue Title | 214 - No evacua route | tion plan or desigr | nated emergency exit | |
| Subcategory | Fire Safety - Fire | alarms & Evacua | tion | |
| New or carried over? | ☑ New | □ C | arried Over | |
| Root cause | □ Training | □ S: | ystem | |
| | □ Costs | □ La | ack of workers | |
| | ☑ Other | | | |
| Root cause - Other | Lack of monitoring | ng | | |
| ETI code or local law issue | Bangladesh Lab | our Rules 2015, R | ule - 55 (8) | |
| Explanation to the non compliance | It was noted through facility visit that, posted evacuation plan was not reflect the actual floor plan in main production shed. As batch section and Quality section was not mentioned in evacuation plan but found in current floor set up. | | | |
| Follow up method | ☐ Follow up au | dit ☑ D | esktop audit | |
| Timescale | □ Immediate | □ 30 days | □ 60 days | 7 |
| | ☑ 90 days | ☐ 120 days | □ 180 days | |
| | ☐ 365 days | □ Other | | |
| Actions | It is recommended that facility should updated evacuation plan as per actual floor set up. | | | |

| Non-Compliance | | | Evidence | | |
|-----------------------------------|--|--|---------------------------------------|--|--|
| [Back to findings s | | | | | |
| | Non-C | ompliance | | | |
| Reference | ZAF600003560 | | | | |
| Clause | 3 - Working Con | ditions are Safe ar | nd Hygienic | | |
| Issue Title | 207 - Isolated oc | currence of blocke | ed fire exits | | |
| Subcategory | Fire Safety - Fire | exits | | | |
| New or carried over? | ☑ New | □ C | arried Over | | |
| Root cause | ☐ Training | □ S | ystem | | |
| | □ Costs | □ La | ack of workers | | |
| | ☑ Other | | | | |
| Root cause - Other | Lack of monitoring | ng | | | |
| ETI code or local law issue | Bangladesh Labour Law, 2006, section: 62(6) | | | | |
| Explanation to the non compliance | It was noted through facility visit that a) 03 out id 06 aisles at dyeing section found faded. b) 02 out of 05 aisles at dyeing section found partially blocked by goods and trolly. | | | | |
| Follow up method | □ Follow up au | dit ☑ D | esktop audit | | |
| Timescale | ☐ Immediate | ☑ 30 days | □ 60 days | | |
| | □ 90 days | ☐ 120 days | ☐ 180 days | | |
| | □ 365 days | □ Other | | | |
| Actions | It is recommende aisles marking a evacuation. | ed that facility sho nd obstacle free a | uld ensure proper isles for worker | | |

| Non-Compliance | | | Evidence | | |
|-----------------------------------|---|---|--|--|--|
| [Back to findings s | | | | | |
| | Non-C | ompliance | | | |
| Reference | ZAF600003561 | | | | |
| Clause | 3 - Working Con | ditions are Safe ar | nd Hygienic | | |
| Issue Title | 237 - Improper s | torage of hazardo | us chemicals | | |
| Subcategory | Chemicals | | | | |
| New or carried over? | ☑ New | □ Ca | arried Over | | |
| Root cause | □ Training | □ Sy | /stem | | |
| | □ Costs | □ La | ack of workers | | |
| | Other | | | | |
| Root cause - Other | Lack of monitoring | ng | | | |
| ETI code or local law issue | Bangladesh Lab | our Law, 2006, sec | ction: 79 (e). | | |
| Explanation to the non compliance | without seconda | ough facility visit the ry containment at ouer found without c | at; chemical found deying section. Also, over. | | |
| Follow up method | ☐ Follow up au | dit ☑ De | esktop audit | | |
| Timescale | ☐ Immediate | □ 30 days | ☑ 60 days | | |
| | □ 90 days | ☐ 120 days | ☐ 180 days | | |
| | □ 365 days | □ Other | | | |
| Actions | It was recommer secondary contacontainer. | nded that facility shinment and cover | nould ensure for chemical | | |

| | Evidence | | |
|---|--|-----|--|
| [Back to findings summary] | | | |
| | Non-Compliance | | |
| Reference | ZAF600003562 | | |
| Clause | 3 - Working Conditions are Safe and Hygienic | | |
| Issue Title | 251 - Premises constructed for a different purpose than its current use (e.g. residence turned to production facility), and no subsequent confirmation of structural safety has been obtained | | |
| Subcategory | Building/Site Maintenance | l . | |
| New or carried over? | ☑ New ☐ Carried Over | | |
| Root cause | ☐ Training ☐ System | | |
| | ☐ Costs ☐ Lack of workers | | |
| | ☑ Other | | |
| Root cause - Other | Lack of monitoring | | |
| ETI code or local law issue | Building construction act 1952, Section 3. | | |
| Explanation to the non compliance | It was noted through documents review and management interview that, Building Construction Approval Plan was taken from Local Union Parishad on 17 January 2008 instead of concern authority RAJUK (Rajdhani Unnayan Kartripakkha). However, the facility has applied for construction approval plan to RAJUK on 27 November 2013. | | |
| Follow up method | ☐ Follow up audit ☐ Desktop audit | | |
| Timescale | ☐ Immediate ☐ 30 days ☐ 60 days | | |
| | ☑ 90 days ☐ 120 days ☐ 180 days | | |
| | □ 365 days □ Other | | |
| Actions | It is recommended that facility should take Building Construction Approval Plan from concern authority. | | |

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:

None

- •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.
- •Facility 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

| There was no dring or young employee absorved in the lability. |
|--|
| Evidence examined: |
| •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 |
| Any other comments: |

| Legal age of employment: | 18 |
|--|--|
| Age of youngest worker found: | 20 |
| Are there children present on the work floor but not working at the time of audit? | ☐ Yes ☑ No |
| Percentage of under 18's at this site (of total workers) | 0% |
| Are workers under 18 subject to hazardous work assignments? | ☐ Yes ☑ No |
| | Please give details: |
| | Not applicable as the facility did not recruit workers under 18 age. |

Audit company: Intertek Bangladesh Report reference:

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:

•The facility is providing more than local legal minimum wage BDT 8000/month for all the employees.

•Time keeping system is finger punch & face detection system.

•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.

•Benefits of paid, annual leave; maternity benefit to appropriate workers.

•All social insurance payments were passed on to the relevant authorities in a timely manner.

•Employees are aware of their minimum wage.

- •The payment done by cash on hand.
- •Wages have been recorded according to documents checked.
- •There are some good practices by the facility; see below Good Example section.

Evidence examined:

- 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

Any other comments:

None

| | 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: 208.0 | 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: 52.0 | Actual Per Day: 2.0 Per Week: 12.0 Per Month: 52.0 | 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: null Per Week: null Per Month: 8000.0 | Actual Per Day: 0.0 Per Week: 0.0 Per Month: 8000.0 | 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: null Per Week: null 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? | ☑ Yes □ 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) | 42 samples from Augu | ember 2022 (Currently ust 2022 (Random Mor ruary 2022(Random Mo | nth) |
| Are there different legal minimum wage grades? If Yes, please specify all. | ☑ Yes ☐ No The Government announced pay structure on 24th January 2019 for the workers of the Garments Industries with effect from December 2018. | | |
| If there are different legal minimum grades, are all workers graded and paid correctly? | ✓ Yes ☐ No ☐ Please give details: | Not Applicable | |
| For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | e ☐ Below legal min ☑ Meet ☑ Above | | |
| Lowest actual wages found: Note: full time employees and please state hour / week / month etc. | | | |
| Please indicate the breakdown of workforce per earnings | e 0% of workforce earning under minimum wage 0% of workforce earning minimum wage 100% of workforce earning above minimum wage | | _ |
| Bonus Scheme found: Please specify details: | Bonus Scheme found:Festival bonus: Facility provides festival bonus to all employees as per company policy Note: type of employee (e.g. full time, temp, etc.) and please stat which units e.g. /hour /week /month etc. | | cy |
| What deductions are required by law e.g. social insurance? Please state all types: | As per section 125 of the Bangladesh Labour Law, 2006, facility 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 2022) factory may deduct BDT 20 for Government Revenue Stamp. | | e, for fines, housing x, provident fund, etc. ment 2022) factory |
| Have these deductions been made? | ☑ Yes □ No | | |
| Please list all deductions that have been made. | 1.Deduction is only ma | ade for un-authorized a | absent |

Audit company: Intertek Bangladesh Report reference:

| Please list all deductions that have not been made. | 1.Housing facility, 2.Loans, 3.Income tax, 2.Fines, 3.Provident fund which is done as per law. etc. | |
|--|---|--|
| Were appropriate records available to verify hours of work and wages? | ☑ Yes □ No | |
| Were any inconsistencies found? (if yes describe nature) | ☐ Yes ☑ No | |
| Do records reflect all time worked? (For instance, are workers asked to attend | ☑ Yes □ No | |
| meetings before or after work but not paid for their time) | Please give details: | |
| Tor their time) | The facility shows all real records which reflect all scenarios. | |
| Is there a defined living wage: This is not normally minimum legal wage. If | ☐ Yes ☑ No | |
| answered yes, please state amount and source of info: | Please give details: | |
| Please see SMETA Best Practice Guidance and Measurement Criteria. | | |
| If yes, what was the calculation method | ☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage | |
| used. | ☐ Figures provided by Unions ☐ Living Wage Foundation UK | |
| | ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation | |
| | ☐ Other – please give details: | |
| Are there periodic reviews of wages? If Yes give details (include whether there is | ☐ Yes ☑ No | |
| consideration to basic needs of workers plus discretionary income). | Please give details: | |
| Are workers paid in a timely manner in line with local law? | ☑ Yes □ No | |
| Is there evidence that equal rates are being paid for equal work: | ☑ Yes □ No | |
| paid for equal work. | Please give details: | |
| | Through payroll records review and employee's interviews' interview, it was confirmed that equal rates are being paid for equal work. | |
| How are workers paid: | ☐ Cash ☐ Cheque | |
| | ☑ Bank Transfer ☐ Other | |

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:

- •Through employees' interview, overtime is voluntary.
- Time keeping system is Card punch & face detection system.
- •All overtime is compensated at a premium rate for all employees.
- Facility has weekly holiday on Friday.

Evidence examined:

- Employees' interviews
- Management interview
- Local laws
- Facility policy on working hours
- Salary sheet
- Pay slip
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours

| Any other comments: | |
|---------------------|--|
| None | |

| Working hours' analysis | | |
|---|------------------------------------|--|
| Systems & Processes | | |
| What timekeeping systems are used? | Card punch & face detection system | |
| Is sample size same as in wages section? | ☑ Yes ☐ 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.) | ☑ Yes □ No | |

Audit company:

Report reference:

| Are there any other types of contracts/employment agreements used? | ☐ Yes ☑ 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.) | □ Yes ☑ No |
| Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period? | ☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain) |
| Is this allowed by local law? | ☑ Yes □ No |
| Maximum number of days worked without a day off (in sample): | 6 |
| Stand | ard/Contracted Hours worked |
| Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency) | ☐ Yes ☑ 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.) | ☑ Yes ☐ No As per Circular on 06 November 2022 from Bangladesh Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid from 17 October 2022 to 16 April 2023. |
| | Overtime Hours worked |
| Actual overtime hours worked in sample (State per day/week/month) | 02 hours/day, 12 hours/week in November 2022 (Current Paid Month) 02 hours/day, 12 hours/week in August 2022 (Random Month) 00 hours/day, 00 hours/week in February 2022 (Random month). |
| Combined hours (standard or contracted + overtime hours = total) over 60 found? | ☐ Yes ☑ No |
| , | Please give details: |
| | 48 standard hours/week + 12 OT hours = 60 hours a day in November 2022 (Current Paid Month) 48 standard hours/week + 12 OT hours = 60 hours a day in August 2022 (Random Month) 48 standard hours/week + 00 OT hours = 48 hours a day in February 2022 (Random month). |
| Approximate percentage of total workers on highest overtime hours: | 80% |
| Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / | ☑ Yes ☐ No ☐ Conflicting Information |
| | Please give details: |
| worker interviews / refusal arrangements) | Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime. |
| | Overtime premium |

Audit company:
Intertek Bangladesh

Report reference: ZAA600000320

| Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages) | ☑ Yes □ No □ N/A – there is no legal requirement to OT premium |
|---|---|
| wagoo) | Please give details: |
| | 200% of Standard wages. |
| Is overtime paid at a premium? | ☑ Yes □ No |
| | Overtime payments for employees are as per legal requirement. 100% employees were getting overtime premium (200% of basic wage) as per legal requirement. |
| 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. | ☐ No ☐ Consolidated pay ☐ Collective Bargaining agreements ☐ Other |
| Please give details | Note applicable |
| 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 | ✓ Overtime is voluntary Onsite Collective bargaining allows 60+ hours/week is voluntary Voluntary Safeguards are in place to protect worker's health and safety |
| checked boxes above e.g. detail of consolidated pay / CBA or Other) | ☐ Site can ☐ Other reasons demonstrate (please specify) exceptional circumstances |
| Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other | As per Circular on 06 November 2022 from Bangladesh Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid from 17 October 2022 to 16 April 2023. |
| Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes? | □ Yes ☑ No |
| If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule? | ☐ Yes ☑ No |

ZAA600000320

Version 6.1

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:

- •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.
- •All employees are male, no female employees were found in the premises, female workers work in their other sister concern namely Aboni Knitwear Ltd.
- There was no evidence of sexual harassment.
- •There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- •The factory provides the same wage amount to all employees of the same rank.
- •There is no restriction for formation of trade union in the factory.

Evidence examined:

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

| Any other commer | nts: |
|------------------|------|
|------------------|------|

None

| Gender breakdown of Management + Supervisors (Include as one combined group) | Male: 100% | , | Female: 0% |
|--|--|-----------------------------|---|
| Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst) | 0 | | |
| 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? | ☐ Hiring | □ Compensation | ☐ Access to training |
| | □ Promotion | ☐ Termination or retirement | No evidence of discrimination found |
| Please give details | No such evidence found. All employees are male, no female employees were found in their facility, female workers work in their other sister concern namely Aboni Knitwear Ltd. | | |
| Professional Davalonment | | | |

Audit company: Intertek Bangladesh Report reference: ZAA600000320

Date:

2022-12-15

| What type of training and development are available for workers? | Orientation Training First Aid Training PPE Training Chemical Handling Training Fire Fighting Training Health & Safety training Mid-level management Training |
|---|---|
| Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details) | ☑ Yes □ 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:

- All employees were recruited by the factory directly.
- •No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- •No subcontractors were used.
- •All employees are getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees

Evidence examined:

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

| Any other co | omments: |
|--------------|----------|
|--------------|----------|

None

| 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☑ Same as actual conditions | | Understood by workers |
| 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 | | | |

Audit company:

Intertek Bangladesh

Report reference:

Date:

Sedexglobal.com

| Type of work undertaken by migrant workers: | There are no migrant workers in the facility. | |
|---|--|--|
| 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 | ☐ Yes ☑ No | |
| (such as for remittances) confirmed in writing by the worker and is evidence of the | Please give details: | |
| transaction supplied by the facility to the worker? | Not applicable | |
| Is there any observation on this finding? | None Observed | |
| Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers) | □ Yes ☑ No | |
| | Non-employee workers | |
| Recruitment Fees | | |
| Are there any fees? | ☐ Yes ☑ No | |
| | rced from a local agent who are not directly paid by the site, but 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 | There is no agency worker in the facility. | |
| Were agency workers' age / pay / hours included within the scope of this audit? | ☐ Yes ☑ No | |
| Were sufficient documents for agency workers available for review? | ☐ Yes ☑ No | |
| Is there a legal contract agreement with all agencies? | ☐ Yes ☑ No | |
| ageneree. | Please give details: | |
| | Not applicable, site does not use agencies. | |
| Does the site have a system for checking labour standards of agencies? | ☐ Yes ☑ No | |
| labour standards or agencies: | Please give details: | |
| | Not applicable, site does not use agencies. | |
| the contractors are paid by the site and the | generally individuals who supply several workers to a site. Usually wages of the workers are paid by the contractor. Common terms, gang bosses, labor provider.) | |
| Any contractors on site? | ☐ Yes ☑ No | |
| | Please give details: | |
| | there were no contractors on this site. | |
| Do all contractor workers understand their | □ Yes ☑ No | |
| terms of employment? | Please give details: | |
| | No contractor on site | |
| | | |

Audit company: Intertek Bangladesh Report reference:

Date:

ZAA600000320 2022-12-15

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: | | |
| •No Sub-contracting and Homeworking were used by this facility. | | |
| Evidence examined: | | |
| Shipment record Goods in and out register Production record Goods in and out gate pass / records | | |
| Any other comments: | | |
| None | | |
| | | |
| 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 | | |

Audit company: Intertek Bangladesh Report reference:

Date:

2022-12-15

9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]

9: Compliance Requirements

- 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.
- 9.2 companies should provide access to a confidential grievance mechanism for all 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:

- •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.
- •Through the factory management and employees' interviews, 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: |
| Anti-Harassment policy Grievance box open register Orientation training record |
| Any other comments: |
| None |

| 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? | ☑ Yes □ No | |
|--|--|-----------------------------------|
| | Please give details: | |
| any other grievances to a 3rd party? | Facility has an open channel for restandard which is posted in the no designated channel to conduct gri | tice board. The facility has a |
| If yes, are workers aware of these channels and have access? Please give details. | All the workers are aware of these to these channels. Facility also ha procedure posted with every comp | s a grievance handling |
| If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details. | Facility has posted hotline & provi | ded grievance box in toilet area. |
| Which of the following groups is there a | ☑ Worker | □ Communities |
| grievance mechanism in place for? | ☐ Suppliers | □ Other |
| Please provide grievance mechanism details | Employee can place their grievance verbally or in written. Employee can also keep their identity confidential if required. | |
| Are there any open disputes? | ☐ Yes ☑ No | |
| | Please give details: | |

Audit company:
Intertek Bangladesh

Report reference:

| Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism) | ☑ Yes ☐ No Please give details: |
|---|----------------------------------|
| Is there a published and transparent disciplinary procedure? | ☑ Yes □ No Please give details: |
| If yes, are workers aware of these the disciplinary procedure? | ☑ Yes ☐ No Please give details: |
| Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)? | ☐ Yes ☑ 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:

- •Only employees with a legal right to work shall be employed or used by the factory. •The youngest age was 20 years old from sample employees.

Evidence examined:

- Factory recruitment policy.
- •Employees personal file.

Any other comments:

None

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 facility prepared an environmental policy and procedure.
- •The facility disposes all solid waste in a segregated area with proper level and identification.
- •The facility also provides awareness training to all related personnel.
- •Solid waste has been handed over to licensee vendor Jakir Enterprise which is valid till 22 June 2026 as per local legislation.
- •Facility conducted Wastewater test on 23 April 2022 from Department of Public Health Engineering.
- •Facility conducted air emission and noise level test on 12 January 2022 from Greenbud.

Evidence examined:

- Environment policy
- Wastage management policy.
- ·Air emission and noise level test reports

Any other comments:

None

Audit company: Intertek Bangladesh Report reference: ZAA600000320

Attachments



Aboni textiles ltd. 15.12.2022.pdf



Photo Report-Aboni-15-12-22.pdf





For more information visit: <u>Sedexglobal.com</u>

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

Click here for Auditors:

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