

Sedex Members Ethical Trade Audit Report





Audit Details							
Sedex Company Reference: (only available on Sedex System)	ZC: 412646173	Sedex Site Re (only available System)		ZS: 412	2647069		
Business name (Company name):	Babylon Washing Ltd.						
Site name:	Babylon Washing Ltd	d.					
Site address: (Please include full address)	Plot: 169-171, 194, 203, 204, 205 Union Tetulzhora, Hemayetpur, Savar, Dhaka.		Country:		Bangladesh		
Site contact and job title:	Md. Julfikar Ali - Assis	stant	Manager (HR,	Admin & Co	mplian	ce)	
Site phone:	+8801716381719		Site e-mail:		julfikar@babylon- bd.com		
SMETA Audit Pillars:	∑ Labour Standards	Health & Safety (plus Environment 2- Pillar)		(plus 4-pillar		□ Business Ethics	
Date of Audit:	8 th November 2022						

Audit Company Name & Logo: Report Owner (payer): (If paid for by the customer of the site **SGS Bangladesh Limited** please remove for Sedex upload) Babylon Washing Ltd.

Audit Conducted By								
Affiliate Audit Company		Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi– stakeholder			Combined Audit (select all that appl	у)			

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

Date: 8th November 2022

To confirm the validity of this report, please visit



https://www.sedex.com/audit-verifier/

Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Date: 8th November 2022



SMETA Declaration

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

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

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

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

Lead auditor: Md. Mahmudur Rahman Shovon APSCA Number: RA 21701562

Team auditor: Most. Mahfuza Akter & Farhana Begum Remun

APSCA Number: RA 21701593, ASCA 21703465

Interviewers: Md. Mahmudur Rahman Shovon, Most. Mahfuza Akter & Farhana Begum

Remun

Report writer: Md. Mahmudur Rahman Shovon

Report reviewer: Mohammed Saiful Islam

Date of declaration: 8th November 2022.

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

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



Summary of Findings

to the	Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		Area of Non–Conformity (Only check box when there is a non– conformity, and only in the box/es where the non–conformity can be found)			Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP								None observed.
OB	Management systems and code implementation							06	 Facility arranges annual picnic and cultural program for all workers once in a year The facility established a library at Tetulzhora High School, this school is nearest to the facility Facility provides winter dress to poor people. Facility provides relief to natural disastrous people Facility arranges blood donation camp for all workers The facility provides sharee and lungi as Eid gifts during Eid UI Fitr.
1.	Freely chosen Employment								None observed.
2	Freedom of Association								None observed.
3	Safety and Hygienic Conditions	\boxtimes	\boxtimes			05			NC: 1. Generator license expired

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						 Workers not using PPE (Personal Protective Equipment). Risk assessment found missing for some areas. Electrician Certificate expired. No PA system was installed.
4	<u>Child Labour</u>					None observed.
5	Living Wages and Benefits				03	 Facility management provides attendance bonus BDT 300 to BDT 500 per month to all workers. Financial help for education, marriage ceremony and medical purpose. Scholarship program for the children of the workers and staff.
6	Working Hours					None observed.
7	<u>Discrimination</u>					None observed.
8	Regular Employment					None observed.
8A	Sub-Contracting and Homeworking					None observed.
9	<u>Harsh or Inhumane Treatment</u>					None observed.
10A	Entitlement to Work					None observed.
10B2	Environment 2-Pillar					Not applicable
10B4	Environment 4–Pillar	\boxtimes	\boxtimes	01		NC:

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					Wastes were not properly segregated.
10C	Business Ethics				None observed.

General observations and summary of the site:

- 1. This factory is washing the garments.
- 2. Factory has a policy to endorse at the highest level, covering human rights impacts and issues, and ensures it is communicated to all employees.
- 3. Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labour was observed. Factory checks the age before recruitment by the doctor and maintains age related documents in the workers' personnel files.
- 4. Facility does not engage any forced or bonded labour. In Bangladesh, no prison labour is engaged outside the prison as per the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.
- 5. Factory treats their workers with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse is practised.
- 6. Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents verification, and nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.
- 7. Workers are free to join or form the trade union, no restriction has been imposed to the workers from the management. Nothing identified through policy verification and factory has formed a Trade Union. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any.
- 8. First aid facility and toilet facilities have been found as per legal requirement. First aiders were well known about the first aid issues and fire fighters are well known about the operation of all firefighting equipment's and regular training is provided to them regarding this.
- 9. All workers are getting ID card during their recruitment. All the workers are receiving contract letter.
- 10. It was verified through document review, factory tour, management interview and employee interview that no homeworking was used by this factory.



- 11. The factory implemented anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory.
- 12. Workers have received overtime allowance at premium rate (double of the basic).
- 13. All workers were provided with pay slips for each pay period which is in easily understandable language to all workers.

Comments from auditor about COVID19:

Following measures were taken by the facility during operation in every day to protect their employees from COVID-19:

- a) Regular checking temperature for each employee while entering in the factory.
- b) Arrange and ensuring hand washing facility for each employee at each entrance of production floor when entering in the factory.
- c) Posted awareness poster in the prominent places.
- d) Ensured physical distancing during entering and leaving time by marking.
- e) Ensuring face mask for each employee.
- f) Maintained same arrangement for visitors.
- a) Reporting system to medical personnel or management if suspected or causes observed.
- e) Reshuffled the lunch time for maintaining social distance.
- F) Provides training to all employees regarding Covid-19.

*Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.



Site Details

	Site Details					
A: Company Name:	Babylon Washing	Ltd.				
B: Site name:	Babylon Washing Ltd.					
C: GPS location: (If available)	GPS Address: Latitude: 23.7972678 Longitude: 90.2656841					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Trade Licence No: 000301, issued by Tetuljhora Union Parishad (Local municipality) and valid till 30 th June 2023. Factory Licence No: 13032/Dhaka, I Category, issued by Deputy Chief Inspector of Factories and valid till 30 th June 2023. Fire Licence No: DD/Dhaka/20868/2008 issued by Bangladesh Fire Service & Civil Defence Authority and expiry date is 30 th June 2022					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Garments Washing					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The audited facility, Babylon Washing Ltd. is a 100% exportoriented washing garments manufacturing company which is located at plot 169-171, 194, 203, 204, 205, Union- Tetuljhora, Hemayetpur, Savar, Dhaka, Bangladesh. Main production process of this facility is Wet process and Dry process. Production capacity of the audited facility is 195,0000 pieces monthly. Production area is occupied about 72,133 square feet; land area is about 230,606 square feet and storage area is about 1026 square feet. The factory was established in 2005 as per incorporation certificate and production has started in 2005.					
	Facility has 4 build given below: Building 1 (6 storied building) Ground floor: Mezzanine floor: 1st floor:	Wet Process S Section, Load Unloading Ar Room Sample Section Distribution St Room Dry Process So Machine Are	cription Section, Batch ding and ea & Office on, Chemical ore & Office ection, Laser a, PP Spray, er, grinding, 3d	Remark, if any NA NA NA		



	Delivery Store Area & Office	
2nd floor to 5 th floor:	Under construction	NA
Is this a shared building?	No	NA
Building 2 (3 storied building)	Description	Remark, if any
Ground floor	Generator Area, Substation and Control Panel.	Commonly shared with Abani Knitwear Ltd. and Abani Textile Ltd.
1st floor	Lab, EGB boiler.	Used by Abani Textile Ltd.
2nd floor	Central store.	Used by Abani Textile Ltd.
3rd floor Is this a shared building?	Yes Yes	NA NA
Building 3 (1 storied building)	Description	Remark, if any
Ground floor	ETP Building, Office and ETP Lab	Commonly shared with Abani Textile Ltd.
Is this a shared building?	Yes	NA
Building 4 (8 storied building)	Description	Remark, if any
Ground floor to 5 th floor	Used by Abani Knitwear Ltd.	Used by Abani Knitwear Ltd.
6th floor	Worker's dining, canteen (used by all factories), Fabric Store, Pattern, Female Prayer Room, 30 % vacant (Used by Abani Knitwear Ltd.)	Commonly used
7 th floor	Used by Abani Knitwear Ltd.	Used by Abani Knitwear Ltd.
Is this a shared building?	Yes	NA



Shed details:		
Shed 1	Description	Remark, if any
Ground floor	Washing section, chemical store used by audited facility.	NA
Is this a shared building?	No	NA
Shed 2	Description	Remark, if any
Ground floor	Fire Control Room & Security Room	Commonly used by all factories.
Is this a shared building?	Yes	NA
Shed 3	Description	Remark, if any
Ground floor	Boiler Area & Compressor and WTP	Commonly used by all factories.
Is this a shared building?	Yes	NA
Shed 4	Description	Remark, if any
Ground floor	Fire Pump Room	Commonly used by all factories.
Is this a shared building?	Yes	NA
Shed 5	Description	Remark, if any
Ground floor	Wastage Area	Commonly used by all factories.
Is this a shared building?	Yes	NA
Shed 6	Description	Remark, if any
Ground floor	Medical Center	Commonly used by all factories.

Is this a shared building?	Yes	NA				
Shed 7	Description	Remark, if any				
Ground floor	Child Care Room	Commonly used by all factories.				
Is this a shared building?	Yes	NA				
employees and employees. No p	al 298 employees. Among 12 Female employees. All pieces rated worker found in th ing hour is 8.00 am to 5.00 pn	are fixed rated ne premises.				
5:00 am including 1-hour rest and lunch break (1:00 to 2:00) pm for day sift. All employees of the factory work 6 days (Saturday to Thursday) in a week and Friday is weekly holiday of the factory. Noted facility declared weekend on Sunday from 19th August, 2022 to 16 th October, 2022 as per government circular to save energy. Facility is paying monthly salary by mobile banking system (ROCKET) to all the employees. The facility's wage period is 1st – 30th /31st of the month within 07 working days.						
For below, please	e add any extra rows if approp	oriate.				
F1: Visible structu Yes	ral integrity issues (large crack	s) observed?				
No F2: Please give details: This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported as a result of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.						
F3: Does the site	have a structural engineer evo	aluation?				
⊠ Yes □ No						
_	e details: The facility has proval plan on 21.10.2021 by E	_				
The facility has to Authority on 28.0	aken existing floor layout plant 4.2022.	from concerned				



G: Site function:	Agent Factory Processing/Manufacturer Finished Product Supplier Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Subcontractor
H: Month(s) of peak season: (if applicable)	Round the year same
I: Process overview: (Include products being produced, main	Product : All kinds washing garments.
operations, number of production lines, main equipment used)	Process: Wet process> Dry process>Quality.
Tham equipment essent	Lines: NA
	Main Equipment: Hydro Machine, 3D Crinkle Machine, Horizontal Brushing Machine, Laser Machine, PP Spay Booth, Tag machine, Curing Oven Machine, Yilmak, Asian Star, Washing machine, Washing & Dyeing Machine, Paddle Dyeing Machine, Acid Wash Machine, Hand Dryer, Boiler, Generator, Etc. Total 90 sets.
J: What form of worker representation / union is there on site?	 ☐ Union (Baybylon Washing Sromik Union) ☐ Worker Committee ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	∑ Yes □ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation Not applicable. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers Not applicable. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.



N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details Not applicable. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.
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Audit Parameters								
A: Time in and time out	Day 1 Time i			me in: NA me out: NA	Day 3 Time in: NA Day 3 Time out: NA			
B: Number of auditor days used:	03 Auditors (03 Auditors used in one day (Covered 2.5 man-days)						
C: Audit type:	Periodic Full Follov Partial Fo	☐ Full Initial ☐ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define:						
D: Was the audit announced?	☐ Announced ☑ Semi – announced: Window detail: 04 weeks ☐ Unannounced							
E: Was the Sedex SAQ available for review?	Yes No If No, why not							
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause							
G: Who signed and agreed CAPR (Name and job title)	Md. Julfikar Ali- Assistant Manager (HR, Admin & Compliance)							
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No							
I: Previous audit date:	6 th Novemb	er 2021.						
J: Previous audit type:	Periodic							
K: Were any previous audits reviewed for this audit								
				I 5				
Audit attendance		_	Management Worker I					
		Senior manageme	ent	Worker Committe representatives	ee Union representatives			
A: Present at the opening (meeting?	⊠ Yes □ I	No	☐ Yes ⊠ No				

Audit company: SGS Bangladesh Limited

Report reference: 9008793 Date: 8th November 2022



B: Present at the audit?	⊠ Yes □ No	☐ Yes ⊠ No	⊠ Yes □ No
C: Present at the closing meeting?	⊠ Yes □ No	☐ Yes ☒ No	⊠ Yes □ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable as Union representative was present during the audit. Moreover, there is no need to form participation committee if there is a Trade union in the facility (Translated). [Amendment of 2018, section-32 (12), Labour Law 2006].		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Not Applicable.		



Worker Analysis

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

Worker Analysis								
		Local			Migrant*			Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	10161
Worker numbers – Male	286 (including management)	0	0	0	0	0	0	286 (including management)
Worker numbers – female	12 (including management)	0	0	0	0	0	0	12 (including management)
Total	298 (including management)	0	0	0	0	0	0	298 (including management)
Number of Workers interviewed – male	24	0	0	0	0	0	0	24
Number of Workers interviewed – female	2	0	0	0	0	0	0	2
Total – interviewed sample size	26	0	0	0	0	0	0	26



A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2:NA B3: Nationality 3:NA	Was the list completed during peak season? ☐ Yes ☐ No If no, please describe how this may vary during peak periods: Since facility does not have any peak season, production volume round the year is same.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1_100% C1: approx % total workforce: Nationality 20 C2: approx % total workforce: Nationality 30	
D: Worker remuneration (management information)	D:0% workers on piece rate D1:0% hourly paid workers D2:100% salaried workers Payment cycle: D3:0% daily paid D4:0% weekly paid D5:100% monthly paid D6:0% other D7: If other, please give details Not Applicable	



Worker Interview Summary		
A: Were workers aware of the audit?	∑ Yes □ No	
B: Were workers aware of the code?	∑ Yes □ No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	20 employees (05 group	os of 04)
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 4	D2: Female: 2
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	Xes No If no, please give details	s: Not Applicable
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	∑ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	□ Favourable □ Non favourable □ Indifferent	
H: What was the most common worker complaint?	No issue was identified of interview.	during worker
I: What did the workers like the most about working at this site?	Good working environm Festival bonus is provide	
J: Any additional comment(s) regarding interviews: None		
K: Attitude of workers to hours worked: Comfortable		
L. Is there any worker survey information available?		
Yes No L1: If yes, please give details: NA		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		

26 employees were selected for interview including 24 male and 02 female employees, they were interviewed as 4 groups of 5 and rest of the 6 employees were interviewed individually. Individual and group interview were conducted in a private place without the presence of any representative from the management.

The employees were assured of confidentiality, and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They can complain directly to their supervisors or line manager and felt free to give their general concerns to their Trade Union representative who would take it to the Trade Union meeting.

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

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

Trade Union member interviews were conducted privately in a separate place. During opening meeting Trade Union representative was present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. He replied naturally regarding their responsibilities as Trade Union member, and he also informed that they can easily carryout their daily job without any difficulties. Trade Union meetings are held on regular basis. He also stated that they could give suggestions on all parts of the site's practices.

O: Attitude of managers:

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

Management of the factory was positive and supportive during the whole audit and Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is the key person of the compliance team and he is responsible for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope, e.g., ETI Base Code, local laws etc. The factory management was found to be cooperative throughout the audit.



Audit Results by Clause

0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

0.A. Guidance for Observations

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
- 0.A.3 Businesses shall identify their stakeholders and salient issues.
- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

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

Current Systems and Evidence Examined

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

Current systems:

- Facility implements and maintains systems for delivering compliance to this Code.
- Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is responsible for compliance with the Code

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

Details:

- 1. Facility Management Interview.
- 2. Document review (Policy record review and training register review).
- 3. Workers Interview.

Any other comments: Nil.

A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details (mai parent company): Factory be authorized at the highest-leand issues, and ensure it is a workers.	has policy which vel human rights impacts	
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	 ☐ Yes ☐ No B1: Please give details: Name: - Md. Julfikar Ali Job title: Assistant Manager (HR, Admin & Compliance) 		
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	Yes No C1: Please give details: The factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.		
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement) Yes No D1: If no, please give detail		s: Not Applicable	
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? E1: Please give details: All and personnel files are kep human resources department by the HR department.		locked away in the	
Ein	مد سالہ		
Findings			
Finding: Observation Company NC Description of observation:		Objective evidence observed:	
None Observed			
Local law or ETI/Additional elements / customer specific requirement: Not Applicable		Not Applicable	
Comments: Not Applicable			
Good exam	Good examples observed:		



Objective Evidence Observed: Not Applicable



Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 1.8%	A2: This year 2021 2_ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 3.5 %	C1: Last year: 2020 03 %
D: 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	03%	
E: Are accidents recorded?	Yes No E1: Please describe: Facility management has maintained an Injury register where they recorded accident.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: 2021 Number: 1.2%	F2: This year: 2022 Number: 1.8%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.9%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2021 0.92%	H1: Last year: 2022 0.98%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months0% workers	I1: 6 months0% workers

Audit company: SGS Bangladesh Limited

Report reference: 9008793 Date: 8th November 2022



OB: Management system and Code Implementation

(Click here to return to summary of findings)

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

Current Systems and Evidence Examined

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

Current systems:

- The factory communicates their code of conduct through training program and notice board regularly including company's own COC.
- Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is responsible for compliance with the Code.
- Facility communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.

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

Details:

- 1. Document review (Policy record review and training register review).
- 2. Facility Management Interview.
- 3. Workers Interview.

Any other comments: Nil.

Management Systems:		
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No A1: Please give details: Site has not been subjected to any fine.	
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: There are effective policy and procedures found to reduce the risk of	



	forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The facility communicated the policy and procedures on risk of forced labour, child labour, discrimination and harassment & abuse with the workers through training program and posted those policies in the notice board. No complaint found from interviewed workers too.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse and factory preserved training records as evidence. During interview workers & management were found aware about the policies and procedures.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	☐ Yes ☑ No F1: Please give details: NA
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Facility has an independent Human Resources Department Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) with some other colleagues are responsible for this department.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Facility has a senior person Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is put into action of the Code.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: Factory has the policy to ensure all worker information confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	⊠ Yes □ No



	J1: Please give details: There is effective policy and procedures found to ensure confidential information is kept confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: It was noted through documents review that facility has assessed the risk to evaluate the effectivenesss of policy and procedure.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No Please give details: It was noted through documents review that facility conducts internal audit and takes initiatives to reduce the identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No N1: Please give details: Facility management communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.
Land rig	nts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	∑ Yes☐ NoN1: Please give details: Factory has established
	the building in their own land.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	
legal due diligence to recognize and apply national	the building in their own land. Yes No O1: Please give details: Facility has a system in place to conduct legal due diligence to recognize and apply national laws and



Non-compliance:		
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	Yes No S1: Please give details: NA	
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	Yes No R1: Please give details: NA	

Non-compliance:		
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
None Observed	Not Applicable	
Local law and/or ETI requirement: Not Applicable	i lele a sa s	
Recommended corrective action: Not Applicable		

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

Description of Good Example (GE): • Facility arranges annual picnic and cultural program for all workers once in a year. • The facility established a library at Tetulzhora High School, this school is nearest to the facility. • Facility provides winter dress to poor people. • Facility provides relief to natural disastrous people • Facility arranges blood donation camp for all workers

The facility provides sharee and lungi as Eid gifts during Eid UI Fitr.



1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

During the audit, no complaint or violation was raised by workers against this clause. The factory has established a written policy to ensure employment is freely chosen. The policy includes the following clause:

- The factory does not hold any original certificate, experience certificate or any identity papers. The factory maintains photocopies of all hiring documents such as birth certificate, school leaving certificates, fitness certificate by registered doctor etc.
- The factory does not limit the workers' freedom. Workers are free to leave the workplace and manage their own time while not on duty. If workers choose to quit their job, they are free to do so as long as they fulfil their obligations agreed under their appointment letter/agreement.
- The factory has displayed overtime policy stating that over time work is voluntary. In case of need of
 actual work pressure, workers are asked and requested to work on voluntary basis except as required
 to meet urgent business needs. There are no records of such urgent business needs identified during
 the audit.
- Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

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

Details:

Recruitment policy, working hour policy, workers personal file, date of birth certificates, school certificates, fitness certificate by registered doctor.

Any other comments: Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	Yes No A1: If yes, please give details and category of workers affected: NA
B: Is there any evidence of a loan scheme in operation	☐ Yes ☑ No



	B1: If yes, please give details and category of	of worker affected: NA	
C: Is there any evidence of retention of wages /deposits	Yes No C1: If yes, please give details and category of worker affected: NA		
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☐ No D1: Please describe finding: NA		
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	Yes No Not applicable E1: Please describe finding: Not applicable		
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	Yes No F1: Please describe finding: NA		
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No Not applicable G1: If yes, please give details and category of workers affected: Facility has policy against forced/trafficked labour. No forced, trafficked and bonded evidence found during audit		
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: Facility has a policy against forced/trafficked labour which maintained by the facility. No forced, trafficked and bonded evidence found during audit.		
Non-compliance:			
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed		Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement Not Applicable		Not Applicable	
Recommended corrective action: Not Applicable		Not Applicable	
•			
Observation:			
Description of observation: None Observed		Objective evidence observed:	
Local law or ETI requirement: Not Applicable		Observed.	



omments: Not Applicable	Not Applicable
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Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed: Not Applicable



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

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Through interaction with factory management and interviews with workers, it was noted that:

- Workers without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. There are no restrictions by the factory or factory management to join the workers in union and to bargain collectively. The factory does not discriminate against workers who wish to join or to form the union.
- The facility management has formed the Trade Union (Baybylon Washing Sromik Union) through election, registration no. Dhaka-5423 and date of election is 20.08.2019.
- All the requirement of the election were sent to the Labour Department timely.
- The factory has provided suggestion/complaint boxes which are easily accessible to all the workers.
- Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is responsible for compliance with the Code.

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

Details:

Complaint box register, Trade Union meeting minute documents.

Any other comments: Nil



A: What form of worker representation/union is there on site?	 ☐ Union (Baybylon Washing Sromik Union) ☐ Worker Committee ☐ Other (specify) ☐ None 		
B: Is it a legal requirement to have a union?	☐ Yes ☐ No		
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No		
	In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers 'representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006). However, this facility PC committee is not required as they have registered Trade Union.		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: Facility has formed a safety committee. (Workers 03 & management 03) total 06. 		
	D2: Is there evidence of free elections? Yes No NA		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: Factory provides adequate facility to conduct regular meeting. Trade Union meeting held on regular basis. Last Trade Union meeting was held on 04.10.2022. Trade Union meeting minutes recorded, and action taken.		
F: Name of union and union representative, if applicable:	Baybylon Washing Sromik Union Md. Mister Ali - President of Trade Union	F1: Is there evidence of free elections? Yes No N/A	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	NA	G1: Is there evidence of free elections? Yes No N/A	



H: Are all workers aware of who their representatives are?	⊠ Yes □ No	All workers w representati	vere aware of who are their ves.
I: Were worker representatives freely elected?	⊠ Yes □ No	11: Date of Ic	ast election: 20.08.2019
J: Do workers know what topics can be raised with their representatives?	Yes □ No		
K: Were worker representatives/union representatives interviewed?	Yes No If Yes , please state how many: 01 representatives.		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Trade Union is effective because they conduct meeting periodically. Last meeting was conducted in 04.10.2022. Trade Union meeting minutes recorded, and action taken. Besides the meting minutes are communicate with the employees through notice board. Last meeting minutes were: 1. Regarding Re-election of Trade Union 2. Covid-19 Safety 3. Discussion of increase production. 4. Formation of safety committee 5. Others. Minutes were communicated through notice board.		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ⊠ No		
If Yes , what percentage by trade Union/worker representation	M1:0% workers covered by Union CBA M2:0% workers covered by worker rep CBA		
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	Yes Not Applicable		
Non-compliance:			
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:		Objective evidence observed: (where relevant please add photo numbers)	
None Observed Local law and/or ETI requirement: Not Applicable			Not Applicable
Recommended corrective action: Not Applicable			



Observation:		
Description of observation: None Observed	Objective evidence observed:	
Local law or ETI requirement: Not Applicable	Not Applicable	
Comments: Not Applicable		
Good Examples observed:		
Description of Good Example (GE): None Observed	Objective evidence observed:	
	Not Applicable	



3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

The factory management has taken the below initiatives regarding health & safety:

- Factory management has formed a Health & Safety Committee (06 members) for monitoring and ensuring the overall health & safety condition of the factory.
- Factory management arranges fire training for the workers regularly. During interview with the fire fighters. It was noted that they are well aware about their roles and responsibilities and in the using of firefighting equipment.
- Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 26.10.2022.
- Firefighting training provided as per law. Last firefighting training was provided on 18.10.2022
- First aid, PPE training provides regularly. Last first aid & PPE training was provided on 3.10.2022& 6.11.2022
- Electric exit light installed in each exit of the factory with alternative backup. Also, sufficient number
 of emergency light was available and found in active condition in each floor and staircases of
 production building. Furthermore, sufficient firefighting equipment (like smoke detectors, fire
 extinguishers, visual fire alarm etc.) was found inside of production floor.
- First aid boxes with sufficient kits were provided in the different floors and sections. There is total 06 numbers of first aid boxes in the factory. First aid training provided to the workers on a regular basis. Further during interview with first aiders it was noted that first aiders have found adequate knowledge on first aid kits and first aiding.
- All interviewed workers were aware about the evacuation procedure during working time.



- Factory has regular fire equipment maintenance system.
- The facility maintains a comfortable temperature, sufficient lighting system and there is well ventilation with sufficient exhaust fan of all the production floors in this facility.
- Worker's toilet segregate male and female, adequate number (as per law) wash facility provided.
- The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed. All switches in the electrical control panels have been labeled.
- Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is responsible to look after the health and safety issues.

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

Details:

During audit, different training documents on health & safety training, first aid training, PPE (personal protective equipment) handling has been checked. Besides these, machine maintenance register, electrical installation register, accident register, needle register, fire drill register, basics of firefighting & first aid, fire equipment checking register also checked by the auditors.

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	 ∑ Yes ☐ No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.
B: Are the policies included in workers' manuals?	
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☑ No C1: Please give details: No structural additions were done.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	



E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	 ☐ No E1: Please give details: Factory has medical facility available with full time Doctor – Ms. Umme Habiba and Medical Assistant – Md. Kamal Uddin, Ms. Sabina Yesmin. Medical room is fully equipped with necessary equipment.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	☐ No F1: Please give details: Factory has medical facility available with full time Doctor - Ms. Umme Habiba and Medical Assistant – Md. Kamal Uddin, Ms. Sabina Yesmin. Medical room is fully equipped with necessary equipment. Workers can access easily the first aiders as well as doctor.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☐ No ☐ Rease give details: No transport facility has been providing and neither it's mandatory by local law. Rather than they provide transport allowance as per law.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	 ☐ Yes ☑ No H1: Please give details: Not applicable. Dormitory facility is not provided to the workers, and it is not required by law.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	No I1: Please give details: Facility has conducted risk assessment for the process including evaluating the arrangements for workers doing overtime. Last risk assessment conducted on 19.10.2022. Noted the facility did not assess specific work-related risks in the PP spray section, hydro extractor machine, tagging section, grinding section, laser section, sample section, acid wash section, and chemical store.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	 ∑ Yes ☐ No J1: Please give details: Facility meets legal obligation of disposing natural resource.



K: Is the site meeting its customer	⊠ Yes
requirements on environmental	
standards, including the use of banned	□No
chemicals?	K1: Please give details: Facility does not use any banned
	chemical.

chemicals? Standards, including the use of banned \(\sum \) No K1: Please give details: Facility does not chemical.	ot use any banned
Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
Issue title: Generator license expired. Description of non-compliance:	01.Documents review and management interview
Through document review, management interview, and facility visit, it was noted that the facility is using 04 generators capacity of 3.26 MW for production purposes, and that the CPP (Captive Power Plant) permission for power generators has expired from 05.03.2022. However, the facility applied for renewal on 02.03.2022 but the updated certificate has not yet been received.	
Local law and/or ETI requirement:	
In accordance with ETI Base Code 3.1 and Energy Regulatory Commission Rules 2006, Rule 16 (1&3)	
ETI base code 3.1: A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Energy Regulatory Commission Rules 2006, Rule 16 (1&3):	
1. In general validity of the license will be 2 years.	
3. For the purpose of the renewing the license, an application has to be submitted to the commission in the prescribed form, after depositing the fees mentioned in the schedule- B, 30 days before the expiry of validity.	
Recommended corrective action: It is recommended that the facility should have valid generator license for power generation from concern authority.	
Action By: Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance)	
Time frame: 180 Days	

2. Description of non-compliance:



☑ NC against ETI code:	NC against Local Law	□ NC against customer	02. plant tour, documents review and management interview
Issue title: Workers were	e not using PPE (Personal Pro	otective Equipment).	NC Photo No: 1,2,3,4
Description of non-con	npliance:		
Following issues were n	oted during plant tour:		
	04 out of 04 dryer machine ocated at shed 1 and 1st flo	operators were not using ear oor of building 1.	
b. 01 out of 04 grindin work at 1st floor of build	•	ot using hand gloves during	
c. 02 out 02 hydro extra eye goggles at ground	·	re not using hand gloves and	
Local law and/or ETI re- In accordance with Bo code 3.1.	=	115, Rule 67 (2) and ETI Base	
prevailing knowledge steps shall be taken to associated with, or oc	of the industry and of any or prevent accidents and in curring in the course of wo	provided, bearing in mind the specific hazards. Adequate hjury to health arising out of, rk, by minimizing, so far as is inherent in the working	
mentioned in Sub-sec provide necessary equ hand gloves, ear muffs	angement of safety and tion (1), the concerned n ipment, including safety sho	health protection measures manufacturing institute must bes, helmets, goggles, masks, ons etc. and arrange training and ensure their usage.	
		should provide awareness PE where required.	
Action By: Md. Julfikar	Ali -Assistant Manager (HR, A	Admin & Compliance)	
Time frame: 30 Days			
3. Description of non-c NC against ETI code:	ompliance: NC against Local Law ent found missing for some o	-	03.Documents review and management interview
1330C IIIIC. KISK USSESSITIE	on round missing for some C	ii Cus.	



Description of non-compliance:

It was noted through a risk assessment record review and management interview that factory management did not assess specific work-related risks in the PP spray section, hydro extractor machine, tagging section, grinding section, laser section, sample section, acid wash section, and chemical store.

ETI or Local Law requirement:

In accordance ETI Base code 3.1 and Bangladesh Labour Rules 2015, Schedule 4(2) B (1)

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

Bangladesh Labor Rules 2015, Schedule 4(2), B (1):

(c) Following matters shall be included in the guideline prepared under clause (a),

namely: -

1. Risk and safety related management of the firm:

- (a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc);
- (b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc);
- (c) Risk level (like high/medium/general/not satisfactory);
- (d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure);
- (e) Assessment of necessary protection system in different nature and levels of risk; and
- (f) Assessment of technical and administrative liability.

Recommended corrective action:

It is recommended that facility management should conduct proper risk assessment for the mentioned areas.

Action By: Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance)

Time frame: 30 Days

4.	Descrip	tion of	non-comp	liance:

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

Issue title: Electrician Certificate expired.

Description of non-compliance:

04.Documents review and management interview



It was noted from documents review and management interview that, 01 out of 01 electrician certificate was expired from 21st December 2021.

Local law and/or ETI requirement:

In accordance with Bangladesh Labor Rules 2015, Rule 58 (8) and ETI Base Code 3.1

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

Bangladesh Labor Rules 2015, Rule 58 (8)

(8) To ensure the secure power system, after every 12 (twelve) months or before ending of the term given in the certificate at least for one time by a appropriate license holder Wiring Inspector or Institution making experiment of the full earthing of wiring of the factory or the company certificate have to he kept with result.

Recommended corrective action:

It is recommended that; facility should collect updated electrician competency certificate from concern authority.

Action By: Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance)

Time frame: 60 Days

5. Description of non-		
M NC against ETI	DNC against Local Law	

M NC againsi Eii	I INC against Local Law	☐ NC against costomer	
code:			05.Plant tour

Issue title: No PA system was installed.

Description of non-compliance:

It was noted during the plant tour that facility management didn't install a public address system (PA) at shed 1 (washing section).

ETI or Local Law requirement:

In accordance ETI Base code 3.1.

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

Recommended corrective action:

Audit company: SGS Bangladesh Limited

Report reference: 9008793 Date: 8th November 2022



It is recommended that factory should install the P.A system in mentioned area.

Action By: Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance)

Time frame: 30 Days

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

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None Observed	None Observed



4: Child Labour Shall Not Be Used

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Factory established a policy which discourages the employment of child labour and no child labour found in the factory during the audit.
- 2. Factory has strong recruitment process to verify the worker's age. 26 sampled workers' personal files were provided for review.
- 3. In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age.
- 4. There was no child or young employee observed in the facility.
- 5. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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

Details:

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

A: Legal age of employment:	14 years (With some restriction)
B: Age of youngest worker found:	20 years



C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No	
D: % of under 18's at this site (of total workers)	0 %	
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	Yes No E1: If yes, give details Not applicable	
	Non–compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable		Objective evidence observed: (where relevant please add photo numbers) Not Applicable
	Observation:	
Description of observation: None Observed		Objective evidence observed:
Local law or ETI requirement: Not Applicable		Not Appliante
Comments: Not Applicable		Not Applicable
Go	ood Examples observed:	
Description of Good Example (GE): None Observed		Objective Evidence Observed: Not Applicable



5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

ETI

- 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

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

Current systems:

- 1. The facility is providing local legal minimum wage BDT 8000/month for all the employees.
- 2. Facility management pay wage to the employee within 7th working days at the end of wage period.
- 3. All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about their wages for the pay period concerned each time that they are paid.
- 4. Each employee was given a pay slip and signed for their wages.
- 5. Employees are aware of their minimum wage.
- 6. Wages have been recorded according documents checked.
- 7. The factory management is deducting absent amount from basic wage from the wage of last and first working month only for the respective resigned and newly joined workers that month's salary calculation, which was as per law.
- 8. There is a good practice by the facility; see below GE section.
- 9. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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

Details:

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



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4. Compensation policy and randomly selected resigned file with benefit.

Any other comments: Nil

Non–compliance:					
Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)				
None Observed Local law and/or ETI requirement: Not Applicable	Not Applicable				
Recommended corrective action: Not Applicable					

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

Good Examples observed:

Description of Good Example (GE):

- 1. Facility management provides attendance bonus BDT 300 to BDT 500 per month to all workers.
- 2. Financial help for education, marriage ceremony and medical purpose.
- 3. Scholarship program for the children of the workers and staff.

Objective Evidence Observed:

- Management, workers interview and document review
- Document review, workers and management interview.

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day and 48 hours per week.	the law) A1: 8 hours/day 48 hours/week	A2: Yes No Not applicable



B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56 (fifty-six) hours per week in any year. Exception for 6 months; Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. This exemption has been extended several times in last few years and latest extension was on 6 November 2022 and it will be in effect from 17 October 2022 to 16 April, 2023.	B1: Maximum OT hours found 3 hours/ day and 18 hours/ week In all sample months (October 2022 (Current Month), June 2022 (Random month), December 2021 (Random Month)	B2: Yes No Not applicable
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: For Garments and Grade 7. BDT. 8000 per month (Basic BDT 4100, House rent 50% of the Basic	C1: BDT 8000/Month	C2: Yes No Not applicable



			which is Medical BDT. 600 allowand Food Allo BDT.900.	allowa Convece. BDT Dwance	nce eyance .350,				
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)				Legal mi of the bo rate per	asic wa	ge	D1: 200% of the basic wage rate per hour.		
		<u>(C</u>	Wa Click here to	iges analy return to K		mation)			
A: Were accurate records shown at the first request?	∑ Yes ☐ No								
A1: If No , why not?	Not app	lica	ble						
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria) 26 attendance records and payroll records from October 2022 (Current No. 2022) 26 attendance records and payroll records from June 2022 (Random mor payroll records from December 2021) 26 attendance records and payroll records from December 2021 (Random mor payroll records from December 2021) 26 attendance records and payroll records from June 2022 (Random mor payroll records from December 2021) 26 attendance records and payroll records from June 2022 (Random mor payroll records from December 2021) 26 attendance records and payroll records from June 2022 (Random mor payroll records from December 2021) 26 attendance records and payroll records from December 2021 (Random mor payroll records from December 2021) 26 attendance records and payroll records from December 2021 (Random mor payroll records from December 2021) 27 attendance records and payroll records from December 2021 (Random mor payroll records from December 2021) 28 attendance records and payroll records from December 2021 (Random mor payroll records from December 2021) 29 attendance records and payroll records from December 2021 (Random mor payroll records from December 2021)					nonth)				
C: Are there different legal minimum wage grades? If Yes , please specify all.	∑ Yes ☐ No	The immunity in the immunity i	nplemented dustries. Th ovember 20	ment has d from 1st ne Gaze 018 and c arate pa uff (Schec	annou Decen Ite Not Imendr y struct dule B).	nced the nber 2018 tification nent was ures: for	e new pay stru B for the workers has been pu done on 24 Ja the garment w Conveyance allowance Tk. 350 Tk. 350 Tk. 350	s of the C oblished nuary 20	Garments on 25th 119. There



		Grade 4	Tk. 4998	Tk. 2499	Tk. 600	Tk. 350	Tk. 900	Tk. 9347
		Grade 5	Tk. 4683	Tk. 2342	Tk. 600	Tk. 350	Tk. 900	Tk. 8875
		Grade 6	Tk. 4380	Tk. 2190	Tk. 600	Tk. 350	Tk. 900	Tk. 8420
		Grade 7	Tk. 4100	Tk. 2050	Tk. 600	Tk. 350	Tk. 900	Tk. 8000
D: If there are different legal minimum grades, are all workers graded and paid correctly?	∑ Yes □ No □ N/A	D1: If No , plea	ase give (details:	Not Applio	cable		
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Below legal min Meet Above	E1: Lowest ac week / month etc BDT. 8420 per	c	ges four	nd: Note: full	l time employed	es and please	e state hour /
F: Please indicate the breakdown of workforce per earnings:	F2:0_	_% of workforce _% of workforce 00_% of workfor	e earning	minim	um wage	-		
G: Bonus Scheme found: Please specify details:	Note: t	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.						
		management orkers as per the						per month
H: What deductions are required by law e.g. social insurance? As per section 125 of the Bangladesh Labour Law, 2006, factory may de wages for un-authorized absence, for fines, housing facility, advance payments to be a social insurance?								
Please state all types:	is provi calculo	As per the Rules of 250(1) of Bangladesh Labour Rules 2015, wages of the workers is provided in which way, the payable donation rate will be determined by calculating on the basis of not less than seven and not more than eight percent of the monthly original wages.						
I: Have these deductions been made?	Yes d	: Please list all eductions that I een made.		facility r	managem	ment review nent deduct ed absent.		
				Please (law.	describe:	Facility dec	duct wage	as per



	I2: Please list all deductions that have not been made.	Based on document review factory does not deduct for below issues- 1. Fines, 2. Housing facility, 3. Advance payments, 4. Loans, 5. Income tax, Revenue stamp. 6. Provident fund etc. Please describe: Factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund etc as per law		
J: Were appropriate records available to verify hours of work and wages?	∑ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes Yes No			
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	∑ Yes ☐ No L1: Please give details: All we	orking hours are reflected in the attendance record.		
M: Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	In gwage: It is not normally not define living wages as it is not required by law. However, factors with source of info: It is not normally not define living wages as it is not required by law. However, factors wages state amount as source of info: It is not normally not define living wages as it is not required by law. However, factors wages state amount wage as Minimum Wages Gazette for Ready made wages as it is not required by law. However, factors wages state amount wages of a subject to the state of			
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: Not applicable			
N: Are there periodic reviews of wages? If	⊠ Yes □ No			



Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	N1: Please give details: Facility management is annually reviewed the wages as per local law. Facility increase minimum 5% on basic wages as increment for all grade's worker annually.
O: Are workers paid in a timely manner in line with local law?	Yes No All workers are paid within the 7 th working days of the following month.
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	☐ Cash ☐ Cheque ☐ Bank Transfer ☑ Other (ROCKET) Q1: If other, please explain:

6: Working Hours are not Excessive

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where <u>all</u> of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current systems:

Noted through working hour policy review that facility has implemented working hour as per law. Facility has maintained working hour related document accurately. No inconsistency identified during document review.

- 1. Standard working hours found 48 hours in the facility.
- 2. Through employees' interview it was noted that they were aware about voluntary overtime policy.
- 3. As per the company policy all overtime will be compensated at a premium rate (200%).
- 4. Casual leave, sick leave, festival leave was provided as per Local Law.
- 5. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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



Details:	
 Employee interview Payroll records Job card records Production records Working hour and overtime hour policies & procedures etc. Management interview. 	
Any other comments: Nil.	

Non-compliance:					
Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Not applicable	Objective evidence observed: (where relevant please add photo numbers)				
Local law and/or ETI requirement: Not applicable	Not applicable				
Recommended corrective action: None					

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

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

Working hours' analysis

Please include time e.g. hour/week/month (Go back to Key information)

Systems & Processes



A. What timekeeping systems are used: time card etc.	Describe: Electronic time keeping (face Punch machine) is used for recording working hour of workers.				
B: Is sample size same as in wages section?	∑ Yes ☐ No If no, please give details: Not Applicable				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	∑ Yes □ No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not Applicable			
D: Are there any other types of	☐ Yes ☑ No	D1: If YES,	please complete	e as appropriate:	
contracts/employment agreements used?		0 hrs	Part time	Variable hrs	Other
		If "Other"	, Please define:		
		Not Appli	cable		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not Applicable			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days No If 'No', please explain:	F3: Is this allowed by local law? ☐ Yes ☐ No			
	Maximum number of days worked without a day off (in sample): 13 days. Facility was open on 2 and 9 October 2022 and 10 June 2022 which was adjusted with Eid-Ul-Fitr and Eid-Ul-Adha festival holiday.				
Standard/Contracted Hours worked					
G: Were standard working hours over 48	☐ Yes ☑ No	G1: If yes, % of workers & frequency:			
hours per week found?		N/A			



H: Any local	Yes	H1: If yes, please give details:		
waivers/local law or permissions which allow averaging/annualised hours for this site?	⊠ No	N/A		
Overtime Hours worked				
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 80 Hours in the month of October 2022 (Current Month) 78 Hours in the Month of June 2022 (Random Month) 75 Hours in the Month of December 2021 (Random Month)			
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☐ No			
K: Approximate percentage of total workers on highest overtime hours:	50%			
L: Is overtime voluntary?	☐ Yes ☐ No ☐ Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Overtime work was found voluntary confirmed through worker interview, contract letter & employment agreement papers review.		
Overtime Premiums	Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 200% of basic wage		
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: Workers who work overtime get premium rate as per local law.		
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	□ No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other			
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other			



	Not Applicable
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	 ✓ Overtime is voluntary □ Onsite Collective bargaining allows 60+ hours/week □ Safeguards are in place to protect worker's health and safety □ Site can demonstrate exceptional circumstances □ Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	Not Applicable
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	Yes No Q1: If yes, please give details: Not Applicable
R: 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 N/A



7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 1. No gender discrimination was found in the facility; both female and male employees were distributed in all types of work.
- 2. The facility provides the same wage amount to male/female employees of the same rank.
- 3. No complain or records found for pregnancy test.
- 4. There is no restriction for formation of trade union in the facility.
- 5. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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

Details:

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

	A1: Male:100% A2: Female0%
group)	



B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	No		
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination fou C1: Please give details: Not applicab discrimination was noted.		
Professional Development			
A: What type of training and development are available for workers?	 Following training are available- Workers receive regular and training. Last Health & Safety 26.10.2022. Firefighting training provided of training was provided on 18.10. First aid, PPE training provides retraining was provided on 03.10. 	training was provided on as per law. Last firefighting 0.2022 egularly. Last first aid & PPE	
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? Yes No If no, please give details: Not Applicable			
	Non–compliance:		
1. Description of non-compliance: NC against ETI NC against Lo code: None Observed	cal Law NC against customer	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement: Not applicable		Not applicable	
Recommended corrective action: Not ap	pplicable		



Description of observation: None Observed
Local law or ETI requirement: Not applicable

Comments: Not applicable

Not applicable

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



8: Regular Employment Is Provided

(Click here to return to summary of findings) (Click here to return to Key Information)

ETI

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

Additional Elements: Responsible Recruitment

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Facility provides ID card for all workers in the time of recruitment.
- 2. Factory maintains service books for all workers.
- 3. There is no home working from the site.
- 4. All workers are getting appointment letter in local language.
- 5. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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

Details:

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



Non–compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: (where relevant please add photo numbers) Not applicable	
Observation:		
Description of observation: None Observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable	
Good Examples observed:		
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not applicable	
Responsible Recruitment	1. 5/4 Jane 5/6/19	
All Workers		

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	 ☐ Terms & Conditions presented ☐ Understood by workers ☐ Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: NA
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	Yes No B1: If yes, please describe details and specific category(ies) of workers affected: NA



C: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between workplace and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other – C1: If other, please give details: Not Applicable
D: If any checked, give details:	Nil
country of which they are not a natio	Migrant Workers: I person who is engaged or has been engaged in a remunerated activity in a conal or permanent resident or has purposely migrated on a temporary basis to a native region to seek and engage in a remunerated activity
A: Type of work undertaken by migrant workers:	Not applicable; No migrant workers employed by the factory.
B: Please give details about	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies

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			
A: Type of work undertaken by migrant workers:	Not applicable; No migrant workers employed by the factory.		
B: Please give details about recruitment agencies for migrant workers:	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used Not applicable; No migrant workers employed by the factory.		
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	Yes No C1: Please describe finding: Not applicable; No migrant workers employed by the factory.	C2: Observations: NA	
D: Are Any migrant workers in skilled, technical, or management roles	Yes No	d example of roles:	



NON-EMPLOYEE WORKERS

Recruitment Fees:			
Recruitment Fees: A: Are there any fees? B: If yes, check all that apply:	Serv App Rec Plac Adn Skills	ruitment / hiring fees ice fees lication costs ommendation fees ement fees ninistrative, overhead or processing fees tests ifications	
	Pass Wor Birth Polic Any Any New Dep Any Othe B1 - If c	dical screenings ports/ID's k / resident permits certificates ce clearance fees transportation and lodging costs after employment offer transport costs between work place and home relocation costs after commencement of employment w hire training / orientation fees dical exam fees osit bonds or other deposits other non-monetary assets er other, please give details: plicable	
C: If any checked, give details:	Nil		
Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)			
A. N. mala ar of graph sign upon		Alt Names if available: Nil	

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



C: Were sufficient documents for agency workers available for review?	☐ Yes ☑ No Not applicable
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No D1: Please give details: Not applicable
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No E1: Please give details: Not applicable

Contractors: Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,		
A: Any contractors on site? A: Any contractors on site? A: If yes, how many contractors are present, please gidetails: Not applicable		
B: If Yes , how many workers supplied by contractors?	Not applicable	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding: Not applicable	
D: If Yes , please give evidence for contractor workers being paid per law:	Not applicable	



8A: Sub-Contracting and Homeworking

(Click here to return to summary of findings) (Click here to return to Key Information)

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

Babylon Washing Ltd. is a garments washing factory. Since facility does not need any subcontractor so that no sub-contractor is being used by the factory. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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

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

Process Subcontracted	Process 1	Process 2
Name of factory	Nil	Nil
Address	Nil	Nil

Details:

- 1. Management Interview
- 2. Workers Interview
- 3. Documents Review

Non-compliance:			
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
None Observed			
Local law and/or ETI /Additional Elements requirement: Not applicable	Not applicable		
Recommended corrective action: Not applicable			



	Observation:	
Description of observation: None O	bserved	Objective evidence observed:
Local law or ETI/Additional elements requirement: Not applicable		Not applicable
Comments: Not applicable		
	Good Examples observed:	
Description of Good Example (GE): None Observed		Objective Evidence Observed:
		Not applicable
Summary of sub-contracting – if applicable Not Applicable please x		
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	Yes No A1: Please describe: Not applicable as no su	ubcontractor is used.
B: If sub-contractors are used, is there evidence this has been agreed with the main client? Yes No B1: If Yes , summarise details: Not applicable as no subcontractor used.		as no subcontractor is
C: Number of sub- contractors/agents used:	Not applicable as no subcontractors/agent is used.	
D: Is there a site policy on sub- contracting?	Po- Yes No D1: If Yes , summarise details: Not applicable as no subcontractor is used.	
E: What checks are in place to ensure no child labour is being	Not applicable as no subcontractor is used.	

used and work is safe?



Summary of homeworking – if applicable Not Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No A1: If Yes , summarise details: Not applicable			
B: Number of homeworkers	B1: Male: 0 B2: Female: 0 Total: 0			Total: 0
C: Are homeworkers employed direct or through agents?	Directly Through Agents Not applicable		C1: If through agents, number of agents:	
	Not applicable		able	
D: Is there a site policy on homeworking?	☐ Yes ☐ No Not applicable			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	Not applicable			
F: What processes are carried out by homeworkers?	Not applicable			
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No G1: Please give details: Not applicable			
H: Are full records of homeworkers available at the site?	☐ Yes ☑ No Not applicable			



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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	 ∑ Yes ☐ No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.
B: If Yes , are workers aware of these channels and have access? Please give details.	Factory has communicated this procedure through orientation training confirmed from worker interview.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Factory has fixed some complaint boxes in workers toilet area. No complaint records found regarding physical abuse or harassment.
D: Which of the following groups is there a grievance mechanism in place for?	 ◯ Workers ◯ Communities ◯ Suppliers ◯ Other D1: Please give details: Facility has grievance mechanism system in place for the workers, suppliers and communities.
E: Are there any open disputes?	Yes No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☐ Yes☐ NoF1: If no, please give details:
G: Is there a published and transparent disciplinary procedure?	



H: If yes, are workers aware of these the disciplinary procedure?			
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☐ No I1: If yes, please give details		
Current Systems and Evidence Examined To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.			
Current systems:			
The facility established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory. Factory install complaint box in workers toilet area. No complaint records found regarding physical abuse or harassment. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.			
Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):			
Details: 1. Policy review 2. Document review 3. Management interview 4. Worker interview 5. Factory tour			
Any other comments: Nil			
Non-compliance:			
1. Description of non-compliance: NC against ETI NC against Loc code: None Observed	cal Law NC against customer	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement: Not ap	plicable	Not applicable	

Recommended corrective action: Not applicable



Description of observation: None Observed
Local law or ETI requirement: Not applicable
Comments: Not applicable

Comments: Not applicable

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



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

(Click here to return to NC-table)

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

It was noted through documents review and workers interview that there are no agency staffs, employment agencies and immigration workers in the factory. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) who is responsible to look after the management of the code.

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

Details:

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

Non-compliance:				
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)			
None Observed Local law and/or ETI /Additional Elements requirement: Not applicable Recommended corrective action: Not applicable	Not applicable			
Observation:				



Description of observation: None Observed

Local law or ETI/Additional Elements requirement: Not applicable

Comments: Not applicable

Not applicable

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



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

(Click here to return to summary of findings)

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

B.4. Compliance Requirements

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

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

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for

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

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

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

B4. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Facility has an environmental policy which covers all the system and complies with the legal requirement.
- 2. Factory surrounding environment found acceptable.
- 3. Facility assessed noise level, air emission which was found acceptable limit conducted on 28.12. 2021.
- 3. Facility has conducted Environmental Impact Assessment (EIA) in June 2018.
- 4. Mr. Manjurul Alam, Deputy Manager (EMS) is responsible person to look after environmental issues of the facility.

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

Details:



- 1. Document review
- 2. Factory tour
- 3. Management interview
- 4. Environmental Impact Assessment (EIA) Report
- 5. Air emission & noise level test review

Any other comments: Nil

Non–compliance:		
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)	
Issue title: Wastes were not properly segregated.		
Description of non–compliance:	01.Plant tour	
It was noted during the facility visit that wastes like empty cartons, sacks, empty drums, and construction materials were kept in an unsegregated manner unde an open sky without weather protection.		
Local law and/or ETI requirement: In accordance with ETI base code 10B4.3 and Bangladesh Labour Law, 2006 section-54:	,	
ETI Base code 10B4.3: Businesses shall be aware of their end client's environmental standards/code requirements		
Bangladesh Labour Law, 2006, section-54:		
Disposal of wastes- Effective arrangements shall be made in every establishment for the disposal of wasters and effluents due to the manufacturing process carried on therein.		
Recommended corrective action:		
It is recommended that the facility management segregate waste properly.		
Action By: Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance)		
Time frame: 30 Days		

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



Good examples observed:	<u> </u>
Good examples observed.	



Environmental Analysis (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Manjurul Alam, Deputy Manager (EMS) is responsible person to look after environmental issues of the facility.
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	∑ Yes No B1: Please give details: Facility has conducted risk assessment (19.10.2022) on environment including implementation of controls to reduce identified risks.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	Yes No C1: Please give details: Facility does not have any recognised environmental system certification such as ISO 14000 or equivalent.
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	Yes No D1: If yes, is it publicly available? Policy has been posted in the production floor.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	Yes No E1: Please give details: In policy a long-term strategy to continual improvement has been set. Besides that, The facility management has identified key impacts by their operation through EIA on June 2018 and facility management provide environment training to the employee on 06.10.2022 & participation was 13 employees.
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	∑ Yes ☐ No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. (For guidance, please see Measurement criteria)	☐ Yes ☑ No G1: Please give details: No such type of system is available.
H: Have all legally required permits been shown? Please gives details.	Yes No H1: Please give details: It was noted through documents review and management interview that facility have legally required permits such as underground water extraction Permission.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	Yes No N/A 11: Please give details: Facility maintains a chemical register and inventory.
J: Is there a system for managing client's requirements and legislation in the destination	⊠ Yes □ No



countries regarding environmental and chemical issues?	J1: Please give details: Fac manage requirements of countries.	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	X Yes No K1: Please give details: Fa (by year 2024) to reduce consumption.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	Yes No L1: Please give details: Fac waste yet. However, the for other work.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	Yes No M1: Please give details: Formaintaining record for word resources & calculate mo	ater, energy and natural
N: Has the facility checked that any Sub- Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☐ Yes ☑ No N1: Please give details:	
Usage/Discharge analysis		
Criteria	Previous year: Please state period:2021	Current Year: Please state period:2022
Electricity Usage: Kw/hrs	340115 kw/hrs	418461 kw/hrs
Renewable Energy Usage: Kw/hrs	6813 kw/hrs	4226 kw/hrs
Gas Usage: Kw/hrs	1680371 m³	153789.7 m3
Has site completed any carbon Footprint Analysis?	☐ Yes ⊠ No	☐ Yes ⊠ No
If Yes , please state result	NA	NA
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Underground water	Underground water
Water Volume Used: (m³)	312715 m ³	181218 m³
Water Discharged: Please list all receiving waters/recipients.	Municipal drainage system	Municipal drainage system



279643 m³ 179004 m³ Water Volume Discharged: (m^3) NA NA Water Volume Recycled: (m^3) 12361 Kg Total waste Produced 18588 Kg (please state units) Total hazardous waste Produced: 16979 Kg 11714 Kg (please state units) NA NA Waste to Recycling: (please state units) Waste to Landfill: NA NA (please state units) Waste to other: 18588 kg 12361 Kg (please give details and state units) 4309342 KG 3244125 KG Total Product Produced (please state units)



10C: Business Ethics – 4-Pillar Audit

(Click here to return to summary of findings)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

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

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

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

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

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

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

10C. Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1. The factory management has business policy, anti-corruption, and anti-bribery policy.
- 2. Md. Julfikar Ali -Assistant Manager (HR, Admin & Compliance) is responsible for the business ethics.

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

Details:

- 1. Document review
- 2. Management interview
- 3. Site tour

Any other comments: Nil



Non-compliance:	
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)
None observed	, , , , , , , , , , , , , , , , , , , ,
Local law and/or ETI/Additional Elements requirement: Not applicable	
Recommended corrective action: Not applicable	

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

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

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	 ✓ Internal Policy ✓ Policy for third parties including suppliers A1: Please give details: Facility has business ethics policy both internal and for suppliers.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	 ∑ Yes ☐ No B1: Please give details: It was noted through documents review and management interview, staff e.g. sales, purchasing, logistics were getting training on ethical Business Practices as their job roles carry a higher level of risk in that area.
C: Is the policy updated on a regular (as needed) basis?	Yes No C1: Please give details: Facility updates their policy as per the requirement.



D: Does the site require third parties including suppliers to complete their own business ethics training

D: Please give details: Facility requires business ethics training from the third parties.



Other findings

Other Findings Outside the Scope of the Code

None Observed

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

None observed



Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.



Photo Form

Adding Images To help keep the size of the Report as small as possible for ease of sending and saving the document we recommend that you use Microsoft Paint to resize your photos. To do so please follow these instructions:

- 1) To start Microsoft Paint, click 'Start', 'Programs', 'Accessories', then 'Paint'.
- 2) Open the image file you wish to edit.
- 3) Click the 'Image' Menu at the top and select "Stretch/Skew Image".
- 4) Choose a percentage figure to resize the image: to avoid distortion, choose the same percentage for horizontal and vertical stretch. Click OK.
- 5) Once you have the desired size, click File > Save As... (To prevent overwriting the original image).
 - Save As ipeg (this provides compression to make the file smaller).
- 6) Please delete this text once complete.

Photo Form

Best Practice Photos:



Non-Conformity photos:





Nc picture 1: Dryer machine operators were not using ear plug during work time.



Nc picture 2: Grinding machine operator was not using hand gloves during work.



Nc picture 3: Hydro extractor machine operators were not using eye goggles.



Nc picture 4: Hydro extractor machine operators were not using hand gloves.



Nc picture 5: Wastes were not properly segregated.

Void

Void

General Facility Tour Photos:







Facility building



Security point









Dryer area

PP spray machine area







Laser area

Grinding area

Quality checking area







3D section

Chemical store

Factory nameplate





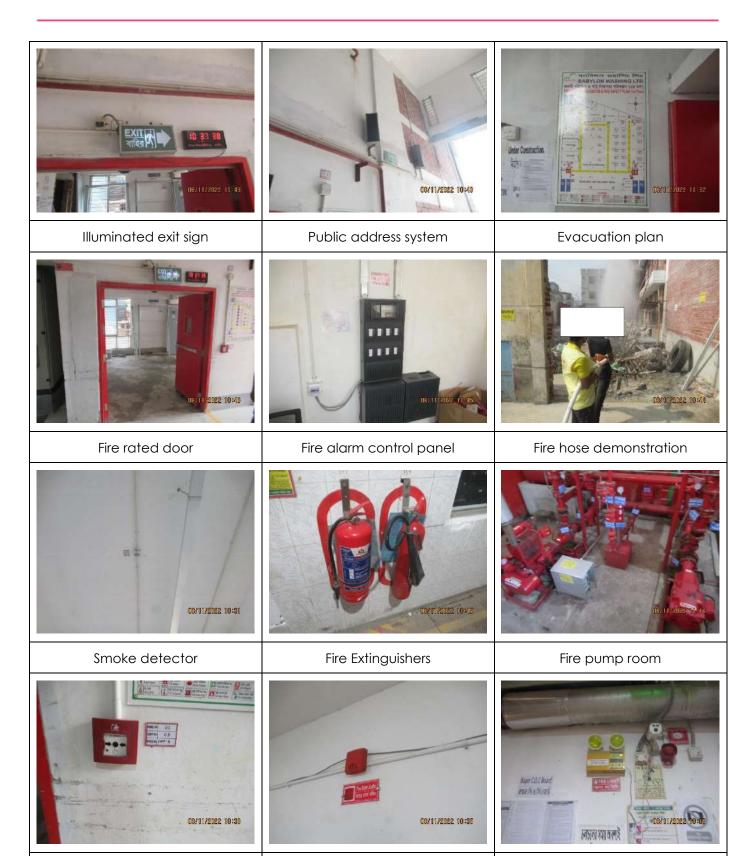


Fire fighting equipment

Fire Hose Cabinet

Emergency light





Fire alarm system

Fire alarm bell

Fog light









First aid box

Doctor room

Patient bed







Staircase

No smoking sign posted

Electrical distribution board







Dining hall

Canteen

Complaint box







Toilet area

Drinking water point

Emergency phone number posted









Notice board

Risk assessment posted

ETI base code posted







Power Generator

Boiler

Eye wash station







Compressor

Substation

Worker's locker







Childcare room

Hand washing system

Covid-19 poster



For more information visit: Sedexglobal.com

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=riPsbE0PQ52ehCo3lnq5Iw_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