




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1083847	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 1063571	
Business name (Company name):	Concorde Garments Ltd.			
Site name:	Concorde Garments Ltd.			
Site address: <i>(Please include full address)</i>	Plot No.: M/3, 3 Road No. 5, Section 7, Mirpur, Dhaka	Country:	Bangladesh	
Site contact and job title:	Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance			
Site phone:	+8801832258458	Site e-mail:	comp@concordegarments.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	16 August 2020			

<b>Audit Company Name &amp; Logo:</b> <b>ITS Labtest Bangladesh Ltd.</b> 	<b>Report Owner (payer):</b>  <b>Concorde Garments Ltd.</b>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

Auditor Team (s) (please list all including all interviewers): Akter Hossain- Deputy Manager (RA 21700574), Md. Salah Uddin-Auditor (RA 21703297), Nusrat Hossain Trisha- Auditor (ASCA 21704282), Md. Mynul Hasan - Auditor (ASCA 21704283)

Lead auditor: Akter Hossain- Deputy Manager APSCA number: RA 21700574

Lead auditor APSCA status: In Good Stand

Team auditor: Md. Salah Uddin, Nusrat Hossain Trisha and Md. Mynul Hasan

APSCA number: RA 21703297, ASCA 21704282 and ASCA 21704283

Interviewers: Akter Hossain, Md. Salah Uddin, Nusrat Hossain Trisha and Md. Mynul Hasan

APSCA number: RA 21700574, RA 21703297, ASCA 21704282 and ASCA 21704283

Report writer: Md. Akter Hossain

Report reviewer: Mazharul Anwar

Date of declaration: 16 August 2020

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

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

## Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>		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)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	<a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				
0B	<a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
3	<a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	03			<u>Non-Compliance:</u> <ul style="list-style-type: none"> <li>Worker found partially block by co-worker, pillar and table</li> <li>Eye and needle guard found displaced in sewing section</li> <li>facility management did not inform the FSCD authority 15 days before the fire drill</li> </ul>
4	<a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
5	<a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			02	<u>Good example:</u> <ul style="list-style-type: none"> <li>Facility provides attendance bonus as per company policy</li> <li>Facility arrange annual picnic for their all employee</li> </ul>

6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				N/A

#### General observations and summary of the site:

- The facility is located at Plot No.: M/3, 3 Road No. 5, Section 7, Mirpur, Dhaka.
- The product manufactures in the facility is All kinds of readymade garments (Woven-Tops)
- Overall responsibility for meeting the standards is taken by Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance.
- Legal minimum pays (BDT 8000.00) was paid to all employees. Correct Overtime hours were paid; Employees were paid 200% of minimum hourly wage for OT hours.
- Total 1849 of employees are currently working in the facility (961 male employees and 888 female employees), which includes 1685 production employees and 164 non-production employees. Generally, the employees work for 6 days (Saturday-Thursday) in a week.
- The younger worker on site was 20 years old.
- There is no union and collective bargaining at this factory. It is also not mandatory by Local Law.
- There is evidence of both male and female in management and among supervisor.
- Site has no peak season. Production is round the year same.
- Site uses no sub-contractors.
- Facility has no Piece rated employees.



- The general working hour of the site is from 8:00 am to 5:00 pm including an hour of lunch break at two shifts 01:00 pm to 02:00 pm & 01:30 pm to 02:30 pm
- Friday is facility weekly holiday.
- Audit scope is one year; from August 2019 to July 2020.
- Audit sample size is 52 according to the total manpower of the facility.
- 52 employees were selected for interview including 27 males and 25 female employees, they were interviewed as 09 groups of 05 and the balances of 22 workers were interviewed individually.
- 52 employees' wages and hours were taken from July 2020 (Current paid month), February 2020 (Random Month) and November 2019 (Random Month)
- Standard working hours on site was in average 208 hours/month with 1 day off in every 7-day-period.

Employee's wages are calculated on a monthly basis. The payment method of the salary is both mobile banking (80%) through Bkash and cash (20%) within 7 working days of following month and the payment cycle is 1-30/31.

*\*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:	Concorde Garments Ltd.																
B: Site name:	Concorde Garments Ltd.																
C: GPS location: (If available)	GPS Address: Plot No.: M/3, 3 Road No. 5, Section 7, Mirpur, Dhaka	Latitude: 23.821438 Longitude: 90.362349															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p><b>Factory License No:</b> 6526/Dhaka, 'I' category, issued by Deputy Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30 June 2021.</p> <p><b>Trade License No:</b> License No. 02-44559 (6/59/17/7/18), issued by Dhaka North City Corporation, which is valid till 30<sup>th</sup> June 2021</p> <p><b>Fire License No:</b> DD/Dhaka/8284/1995, issued by Bangladesh Fire Service &amp; Civil Defense Authority, which is valid till 30<sup>th</sup> June 2021.</p>																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kinds of readymade garments (Woven-Tops)																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Concorde Garments Ltd. is located at Plot No.: M/3, 3 Road No. 5, Section 7, Mirpur, Dhaka. The facility has started its operation in 1983 (Current location). Total land area of the facility premises 40468.33 Square feet, production area 99282 Square feet and warehouse area 13500 Square feet respectively. No other sister concern is present in the same facility premises.</p> <p>Total 1849 employees are working in the facility including 164 non-production employees. Out of 1849 employees, 888 are female employees and 961 are male employees.</p> <p>The facility premises consist of one 6 storied building, one 3 storied building, one 2 storeyed utility building and 01 Shed. All buildings made by concrete and steel.</p> <table border="1"> <thead> <tr> <th colspan="3">Building – 1 (RCC with Steel Structure)</th> </tr> <tr> <th>Floor</th> <th>Description</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Finishing Section, Store (Trims &amp; Accessories), store office, Child Care Centre, Packing section, Security Room, Fire Control Room, Compressor Room</td> <td>None</td> </tr> <tr> <td>1<sup>st</sup> Floor</td> <td>Sewing line, sample, doctor room, Needle Store, Sewing Section, Buyer QC Room</td> <td>None</td> </tr> <tr> <td>2<sup>nd</sup> Floor</td> <td>Sewing Section, Maintenance room</td> <td>None</td> </tr> </tbody> </table>		Building – 1 (RCC with Steel Structure)			Floor	Description	Remarks	Ground Floor	Finishing Section, Store (Trims & Accessories), store office, Child Care Centre, Packing section, Security Room, Fire Control Room, Compressor Room	None	1 <sup>st</sup> Floor	Sewing line, sample, doctor room, Needle Store, Sewing Section, Buyer QC Room	None	2 <sup>nd</sup> Floor	Sewing Section, Maintenance room	None
Building – 1 (RCC with Steel Structure)																	
Floor	Description	Remarks															
Ground Floor	Finishing Section, Store (Trims & Accessories), store office, Child Care Centre, Packing section, Security Room, Fire Control Room, Compressor Room	None															
1 <sup>st</sup> Floor	Sewing line, sample, doctor room, Needle Store, Sewing Section, Buyer QC Room	None															
2 <sup>nd</sup> Floor	Sewing Section, Maintenance room	None															



	3 <sup>rd</sup> Floor	Sewing Section, In-house Library, Idle Machine Room	None
	4 <sup>th</sup> Floor	Sewing Section, Critical process room, Buyer QC Room	None
	5 <sup>th</sup> Floor	Canteen, Dining Room	None
	<b>Building – 2 (Steel building)</b>		
	Ground Floor	Finishing Section, Spot Removing Room, Thread Sucking Section, Generator Room, Compressor Room	None
	Mezzanine 1	Sub-Station Room	None
	Mezzanine 2	Dry Room	None
	1 <sup>st</sup> Floor	Sewing Section (Line No. – 10,12,13,14,15,17)	None
	2 <sup>nd</sup> Floor	Cutting /Fusing Section	None
	<b>Shed- 1</b>		
	Ground Floor	Fabric Warehouse & Finished Carton Store, Fabric Inspection Room	None
	<b>Utility Building</b>		
	Basement floor	Pump room	None
	Ground Floor	Boiler room, Generator room	None
	1 <sup>st</sup> Floor	Wastage Room	None
<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No such cracks were found during audit.</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details: Site have a structural engineer evaluation, Building construction and machine layout plan had been approved from Rajuk in 25/06/2015 and DIFE in 31/01/2019 respectively.</p>			
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower		

	<input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	No peak season. Production is round the year same
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p><b>Product Manufactured:</b> All kinds of readymade garments (Woven-Tops)</p> <p><b>Main production process:</b> Cutting-Sewing-Finishing-Packing</p> <p><b>Production Capacity:</b> 6,50,000 pieces per month  <b>Production Lines:</b> 17</p> <p><b>Machines used:</b> Single needle lock stitch machine, saddle stitch, Double needle lock machine, Double needle chain stitch, Button stitch machine, Button hole stitch, three needle chain stitch machine, Feed of the arm, Bartack machine, Fusing machine, Collar turning, Manual Two needle lock stitch machine, Over lock machine, Overlock Collar cutting, Manual chain stitch, Manual hole stitch, snap button machine, cloth cutting machine, Collar cutting, Flat lock, thread sucking machine, Grinding Machine, Heat seal, Steam iron, Binding machine, Button pull test machine, Generator, Air compressor</p> <p><b>Chemical used:</b> Detergent, Diesel, Machine Oil, Spot Lifter 833</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08:50 hrs Day 1 Time out: 17:10 hrs	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	04 Auditors in one day (4 Man Days)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 04 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	16 September 2019		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

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

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

## Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national 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	
Worker numbers – Male	961	0	0	0	0	0	0	961
Worker numbers – female	888	0	0	0	0	0	0	888
Total	1849	0	0	0	0	0	0	1849
Number of Workers interviewed – male	27	0	0	0	0	0	0	27
Number of Workers interviewed – female	25	0	0	0	0	0	0	25
Total – interviewed sample size	52	0	0	0	0	0	0	52



A: Nationality of Management	Bangladesh	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: _____ Bangladesh</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: The audited facility has no peak season. Production is round the year same</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 _____ 100%</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: _____ 100% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: _____ 100% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	





Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	08 Groups of 04	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 11	D2: Female: 09
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	None	
I: What did the workers like the most about working at this site?	Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.	
J: Any additional comment(s) regarding interviews:	Workers were happy to work at the audited facility as they are having positive working environment and proper hygienic health and safety system.	
K: Attitude of workers to hours worked:	Very favourable as total working hour is within their limit and overtime is fully voluntary.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes		

☒ No

L1: If yes, please give details:

M: Attitude of workers:

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

Interviewed workers were happy to work at the audited facility as they are having positive working environment and proper hygienic health and safety system is maintained regular basis with monitoring. Employees were asked about their leave procedure and legal benefit. Also, about management and employee communication handling, all information found positive from the facility employee. Employees grievance mechanism system found very effective and workers have knowledge regarding this through training process

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

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

The Participation Committee members were positive about the facility and looking forward to developing relationships with the management team.

Participation Committee members' interviews were conducted privately in a separate place. The participation Committee members replied naturally regarding their responsibilities as PC member and they also informed that they can easily carryout their daily job without any difficulties.

O: Attitude of managers:

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

The facility management showed a positive attitude to this audit and during the whole audit process, Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance, along with his team were present through the audit process and co-operated the whole audit. Facility management respects client's requirement and allowed auditor to take photographs of all production process, best practices and also non-conformities. They also provided required documents' photocopy and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions.

## 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.*

- The responsible person for implementation and monitoring is Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance.
- The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

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

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has a social compliance policy which is a commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Sheikh Aminul Hakim Raj Job title: Group Senior Manager, Compliance
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility uses software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.

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

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

## 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: August18 to July 19:  ___2.2___ %	A2: This year: August19 to July 20:  ___1.9___ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	May 2020 to July 2020: 1.7%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: ___2.1___ %	C2: This year ___1.8___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	May 2020 to July 2020: 1.6%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Minor cut in finger by needle on 4 July 2020.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: August18 to July 19: Number: 0.07%	F2: This year: August19 to July 20: Number: 0.05%
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]	May 2020 to July 2020: 0.03%	
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: August18 to July 19: 0%	H2: This year: : August19 to July 20: 0%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0___% workers	I2: 12 months ___0___% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ____0____% workers	J2: 12 months ____0____% workers
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### 0B: Management system and Code Implementation

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

- Responsibility for meeting the legal and client code requirements is taken by Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance.
- The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- The ETI based code was posted on-site for employee's review.
- The facility had set up policy and pointed one staff to update labour law requirements.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- The facility conducts orientation training for all new employees and last orientation training was conducted on 11 August 2020 with 56 participants.

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

##### Details:

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

Any other comments: None

### 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: At the last 12 months the site has not been subjected to any fine or prosecution for non-compliance to any regulations.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: It was noted through documentation review, facility has policies, and procedure for force labour, child labour, discrimination harassment and abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	It was noted through management and worker interview that overtime is voluntary for all employee. No child labour is found in the facility during the facility tour. And age verification certificate found in all the reviewed personal file.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Managers were provided training for forced labour, child labour, discrimination, harassment & abuse on Mid-level Management training. Last training occurred on 19 July 2020 with six participants.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Training record were found including pictures and attendance sheet.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe: Facility has conducted WRAP audit and the validity period is 29 May 2020.
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Capt. Rahmatullah, General Manager- Human Resource & Admin with 07 officers.
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The facility has an IT security policy which ensures worker information is confidential.

J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Details: Facility conducts risk assessment which evaluates effectiveness of every policy and procedure department wise. Last risk assessment conducted on 27 June 2020.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reducing it.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Details: The facility has all the required licenses and permissions as per legal requirements.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Details: The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Details: The facility has ownership of the building maintaining all legal procedure and no expansion was conducted.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	R1: Details: The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Details: Not applicable

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b>  None observed

## 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:

- The facility has a policy which prohibits forced labour, and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employee interview.

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

##### Details:

- Facility policy and procedure
- Sample employee personal files.
- Service book
- Employee handbook

Any other comments: None

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

	Facility has a policy mentioning Workers are free to terminate employment from the facility.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable  E1: Please describe finding: The facility has yearly production turnover 39.27 Million USD and facility has not published modern day slavery statement.
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Not Applicable
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable  G1: If yes, please give details and category of workers affected:  Facility has established forced labour and bonded labour policy; even though they have no such type of labour.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  H1: Please describe finding:  The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.

#### 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:** None

##### Objective evidence observed:

*(where relevant please add photo numbers)*

None Observed

#### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** None

##### Objective evidence observed:

None observed

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



## 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:

- All the employees can form or join the trade union of their choice.
- There is no trade union in the facility but there is an elected participation committee and election has been conducted on 20 February 2019.
- There are 18 members in participation committee (09 members on behalf of employees and 09 members from management side).
- Participation Committee meeting arranges in every two months interval as per legal requirement. Last meeting of Participation Committee was held on 18 June 2020.
- PC members are not treated less favourably than other workers and can carry out their duties within working hours without affecting their remuneration.

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

##### Details:

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

Any other comments: None

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

- ☐ Union (name)
- ☒ Worker Committee
- ☐ 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box.  D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a policy regarding Freedom of Association. The committee members are involved in the development part of the facility. Besides, facility conducts regular meeting with the members of Worker Committee (Participation Committee) and the meeting minutes were communicated with the workers through notice board.	
F: Name of union and union representative, if applicable:	Not applicable	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	A participation committee consists of 18 members, where 09 members on behalf of employee side and 09 members on behalf of facility management.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Participation committee members name with picture are posted in the notice board.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 20 February 2019.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 02	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Participation committee meeting held in every two months. Last meeting held on 18 June 2020 and meeting topic was as below- 1. Regarding safety from Corona Virus 2. Health & Safety 3. Production & Regarding bKash payment	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA Not applicable	M2: ____% workers covered by worker rep CBA Not applicable
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	

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

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

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

### 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:

##### 1. General Health and Safety management

- Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance, looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and Last test done on 10 June 2020 from Department of Public Health Engineering. Tested parameters were pH, TDS, Iron, Arsenic, Total coliform etc where all the parameters were within acceptable limit as per ECR, 1997 and WHO guideline for drinking water.
- Site have a structural engineer evaluation from Rajuk.
- Sufficient clean toilets segregated (39 for female and 33 for male) by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that Health & Safety committee meeting held once every two months.
- Due to COVID-19 situation, number of measures has been taken by the facility to prevent spread of the virus like: spraying disinfectant on vehicles entering the premises, sufficient handwash and sanitizing facility for everyone, checking body temperature, regular cleaning and disinfecting the whole premises, developing mass awareness and training on how to avoid the virus etc. Moreover, facility has necessary arrangement to isolate, primarily treat and transfer to hospital facility in case of any COVID-19 patient is found.

##### 2. Fire Safety

- There are 02 or more exit in each room which were open throughout the working hour.
- Assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up-to-date. Facility checked all fire equipment monthly schedules wise.
- The facility management posted the evacuation plans on every production floors/shed with local language.
- Public Address system and fire hose found active throughout the facility.
- Facility installed addressable smoke detection system in the production building.

- Facility has a firefighting team of 507 members where 397 of them are trained by Fire Service & Civil Defence authority. Rest of them are internally trained

**Fire drill Information:**

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Fire Service & Civil Defense	28 September 2019	4 min 59 second	1806	Senior Station Officer (FSCD)
Day	15 March 2020	2 min 59 second	1767	Fire Safety Officer
Night	20 April 2019	2 min 59 second	1794	Fire Safety Officer

**Fire Equipment Details**

Fire Equipment name		Total	Fire Equipment name	Total
Fire extinguisher	ABC	167	Rope	04
	CO2	63	Helmet	52
	Foam (10 Litre)	04	Gong bell	09
Fire Alarm Call Point		44	Torch Light	02
Multi Detector		543	Stretcher	21
Smoke detector		212	Gas Mask	52
Fire Bitter		34	Fire Alarm bell	43
Hand Gloves		54 pair	Heat Detector	50
Lock cutter		21	Fire Door	34
Blanket		34	Fire-Proof Dress	04 set
Hose Pipe		20	Close Circuit Camera	91

**3. Electrical, Machine & fire safety**

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 08 certified electricians who check and do inspection, roster wise for whole facility.
- Facility checks all electric channels, distribution board and electric connection by following the schedule.

**Electrical equipment checking information:**

(Name) Inspection record	Last inspection date	Done by (designation)	Frequency of inspection
DB/SDB/MDB maintenance	16 August 2020	Group Power Engineer	As required
Machine maintenance	15 July 2020	Manager Maintenance	As required
Boiler maintenance	16 August 2020	Boiler Operator	As required
Generator Maintenance	16 August 2020	Generator Operator	As required
Compressor Maintenance	16 August 2020	Compressor Operator	As required

**4. Chemical safety:**

- Material Safety Data Sheets and labelling were found available for all chemicals.

**5. Medical services:**

- There were 22 first aid boxes with sufficient kits in the full facility.

- Facility has appointed 01 Doctor who sits in the facility six days in a week as roaster basis and 01 Nurse along with 01 Medical assistant who are available throughout the day. They also arranged regular first aid training with first aider.

#### 6. Dormitory:

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

#### 7. Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
Orientation Training to factory rules	11 August 2020	56	Welfare Officer & Senior Counselor	Regular basis
Fire Fighting Training (Internal)	11 August 2020	56	Fire Safety Officer	As required
Fire Fighting Training (External)	02 December 2019	40	Warehouse Inspector (FSCD)	As per requirements
First Aid Training	16 July 2020	14	Medical Officer	Monthly
PPE Training	02 July 2020	09	Welfare Officer & Senior Counselor	Monthly
Mid-level management Training	19 July 2020	06	Welfare Officer & Senior Counselor	Monthly
Health & Safety Training	14 July 2020	04	Welfare Officer & Senior Counselor	Regular basis
Chemical Handling Training	22 July 2020	16	Maintenance Manager	As required
Covid Awareness Training	04 August 2020	25	Welfare Officer & Senior Counselor	Monthly

#### 8. Reports:

Test name	Name	Date
Drinking water tested from	Department of Public health Engineering	10 June 2020
Noise Level tested from	National Testing Calibration & Inspection Ltd.	27 October 2019
Air Emission tested from	National Testing Calibration & Inspection Ltd.	27 October 2019

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

Details:

- License review: Fire license
- Building approval plan
- Group insurance
- Water test report
- Injury record and analysis report
- Machine and electric maintenance record
- Risk assessment report
- Training record: Fire training, First aid training, PPE training, MSDS training, Health and safety training
- Fire drill record



- Health and safety committee record
- Electric installation checking record
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Accident reports
- Chemical list and MSDS for each chemical
- Health and safety policy
- Potable water testing certificates

Any other comments:

Preventives Measure taken by Facility regarding Covid-19 situation:

- Maintaining social distance in entrance, production floor and throughout the facility.
- They are disinfecting vehicle before entering the workplace.
- Thermal checking of each employee and visitor.
- Regular announcement on Public Address for COVID-19 awareness.
- Hand washing facility for each employee.
- They maintain the daily health check-up facility for Covid-19 by doctor.

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility provides workers manual to the workers where all the policies and applicable govt. law are included.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No additional structures were found with building construction approval.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All the visitors to the site are informed on H&S and provided with personal protective equipment where necessary.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The facility has medical facility for the employees. Equipment's are provided as per legal requirements.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility has 01 Doctor, 01 Medical assistant and 01 Nurse for medical treatment of the employees throughout the working hours.

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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  G1: Please give details: Facility does not provide transport to the employees maintaining all required measures.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  H1: Please give details: The facility provides personal storage space for all the employees and they are fit for purposes.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  I1: Please give details: The facility conducts risk assessment for their people to reduce identified risk. last risk assessment conduct on 27 June 2020.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  J1: Please give details: The facility management has conducted air emission and noise level assessment as required by law.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  K1: Please give details: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.

### Non-compliance:

#### 1. Description of non-compliance:

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

It was noted through facility tour that approximate 7 to 10 worker in the sewing line of 1<sup>st</sup> floor, 3 worker in the sewing line of 2<sup>nd</sup> floor located at building 1 and 8 to 10 worker in the cutting section of second floor located at building 2 was found partially block by co-worker, pillar and tables.

#### Local law and/or ETI requirement

##### Working condition are safe and hygienic 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 Law 2006, Section-62 (6) & section 72 (c)

62 (6) A free passage-way giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the establishment;

72 (c) all floors, ways and stairways shall be clean, wide and clear of all obstructions.

#### Objective evidence observed:

(where relevant please add photo numbers)

1. Through facility tour  
NC Photo -1

**Recommended corrective action:**

It is recommended that facility should ensure workstation free from any obstacles.

**Action by:** Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance

**Timeframe:** 60 days

**Verification Method:** Desktop.

**2. Description of non-compliance:**

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

It was noted through facility tour that

a) around 10% eye guard of overlock machine were found displaced in sewing section located at 2<sup>nd</sup> floor of building -1

b) Around 15% of needle guard were displaced by employees working on the sewing machine in the sewing section located at 1<sup>st</sup> and 3<sup>rd</sup> floor of Building-1

**Local law and/or ETI requirement:**
**Working condition are safe and hygienic 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 64(2):**

Effective machine guard or eye safety goggles must be installed/used in all cases where the possibility of having injuries in the eye is high

**Recommended corrective action:**

It is recommended that facility should ensure machine guards are used to avoid occupational injury.

**Action by:** Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance

**Timeframe:** 60 days

**Verification Method:** Desktop.

**3. Description of non-compliance:**

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

It was noted through management interview and documents review that the facility management did not inform the FSCD (Fire Service and Civil Defense) authority 15 days before the fire drill which was arranged internally on 15 March 2020. Note that, facility informed it to FSCD on 14 March 2020.

**Local law and/or ETI requirement:**
**Working condition are safe and hygienic 3.1:**

2. Through facility tour  
NC Photo 2&3

3. Through document  
review and  
management interview

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 55 (14)**

As per Section 62(8), fire drills and emergency evacuation drills have to be arranged at least once in every six-month period and the same has to be preserved in respective record books, in accordance with Form- 22. In addition, the concerned Inspector and nearby Fire Service Station have to be informed minimum 15 days before the drills are held.

#### **Recommended corrective action**

It is recommended that facility should inform the concerned authority prior to 15 days of conducting drills.

**Action by:** Sheikh Aminul Hakim Raj- Group Senior Manager, Compliance

**Timeframe:** 60 days

**Verification Method:** Desktop.

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

Good Examples observed:	
<b>Description of Good Example (GE):</b> None observed	<b>Objective evidence observed:</b> 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:

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

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

##### Details:

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

Any other comments: None

A: Legal age of employment:	18
B: Age of youngest worker found:	20
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %

E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details Not applicable
--	--

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

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

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

## 5: Living Wages are Paid

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

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

### ETI

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

- The facility is providing local legal minimum wage BDT 8000/month for all the employees.
- Time keeping system is Electronic card punch.
- All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- Each employee was given a pay slip and signed for their wages.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- There are good practices by the facility; see below GE section.
- Salary sheet and timecard review were July 2020 (Currently Paid Month), February 2020 (Random Month) and November 2019 (Random Month).

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

##### Details:

- Salary sheet review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review
- The time frame for record reviewed are as follows: August 2019 to July 2020

Any other comments: None



### 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:** None

#### Objective evidence observed:

(where relevant please add photo numbers)

None Observed

### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** None

#### Objective evidence observed:

None observed

### Good Examples observed:

Description of Good Example (GE):

- Facility provides monthly attendance bonus BDT 500 for all operators, quality inspector & Iron man and BDT 300 for all helper
- Facility arranges annual picnic for their all employee

#### Objective Evidence Observed:

Document review, management and worker interview

### Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	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 Hour	A1: 8 Hour	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum:4 Hour	B1: 2 hours/day, 12 hours/week, 50 hours/month in July 2020 (Current paid Month)  2 hours/day, 12 hours/week, 48 hours/month in February 2020 (Random	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



		Month) 2 hours/day, 12 hours/week, 50 hours/month in November 2019 (Random Month)	
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: 8000.00 per month	C1: 8000.00 per month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: BDT Per hour 200% of basic hourly rate	D1: BDT Per hour 200% of basic hourly rate	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: <a href="#">(Click here to return to Key Information)</a>																																																		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																	
A1: If <b>No</b> , why not?	Not Applicable																																																	
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)	<ul style="list-style-type: none"> <li>- 52 samples taken from July 2020 (Current paid month),</li> <li>- 52 samples taken from February 2020 (Random Month)</li> <li>- 52 samples taken from November 2019 (Random Month)</li> </ul>																																																	
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div> C1: If <b>Yes</b>, please give details: The Government announced pay structure on 24<sup>th</sup> January 2019 for the workers of the Garments Industries with effect from December 2018. <table border="1"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>10938</td> <td>5469</td> <td>900</td> <td>600</td> <td>350</td> <td>18257</td> </tr> <tr> <td>Grade 2</td> <td>9044</td> <td>5422</td> <td>900</td> <td>600</td> <td>350</td> <td>15416</td> </tr> <tr> <td>Grade 3</td> <td>5330</td> <td>2665</td> <td>900</td> <td>600</td> <td>350</td> <td>9845</td> </tr> <tr> <td>Grade 4</td> <td>4998</td> <td>2499</td> <td>900</td> <td>600</td> <td>350</td> <td>9347</td> </tr> <tr> <td>Grade 5</td> <td>4683</td> <td>2342</td> <td>900</td> <td>600</td> <td>350</td> <td>8875</td> </tr> <tr> <td>Grade 6</td> <td>4380</td> <td>2190</td> <td>900</td> <td>600</td> <td>350</td> <td>8420</td> </tr> </tbody> </table> </div>	Grades	Basic wage (BDT)	House rent (50% basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)	Grade 1	10938	5469	900	600	350	18257	Grade 2	9044	5422	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347	Grade 5	4683	2342	900	600	350	8875	Grade 6	4380	2190	900	600	350	8420
Grades	Basic wage (BDT)	House rent (50% basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)																																												
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Grade 6	4380	2190	900	600	350	8420																																												

		<table border="1"> <tr> <td>Grade 7</td><td>4100</td><td>2050</td><td>900</td><td>600</td><td>350</td><td><b>8000</b></td></tr> <tr> <td>Apprentice</td><td>2750</td><td>1375</td><td>900</td><td>600</td><td>350</td><td><b>5975</b></td></tr> </table>	Grade 7	4100	2050	900	600	350	<b>8000</b>	Apprentice	2750	1375	900	600	350	<b>5975</b>
Grade 7	4100	2050	900	600	350	<b>8000</b>										
Apprentice	2750	1375	900	600	350	<b>5975</b>										
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If <b>No</b> , please give details:														
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  Lowest gross salary found 8000.00 BDT without any OT In the Month of July 2020.														
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___8___% of workforce earning minimum wage F3: ___92___% of workforce earning above minimum wage															
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i>  Facility management provides attendance bonus as per company policy.															
H: What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc  As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.															
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<table border="1"> <tr> <td>           I1: Please list all deductions that <b>have</b> been made.         </td><td>           1. Un-authorized absence            2. Revenue Stamp             Please describe: As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.            As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp. tax, provident fund, etc.         </td></tr> <tr> <td>           I2: Please list all deductions that have not been made.         </td><td>           Deduction is only made for un-authorized absent which is done as per law.         </td></tr> </table>	I1: Please list all deductions that <b>have</b> been made.	1. Un-authorized absence 2. Revenue Stamp  Please describe: As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp. tax, provident fund, etc.	I2: Please list all deductions that have not been made.	Deduction is only made for un-authorized absent which is done as per law.										
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I2: Please list all deductions that have not been made.	Deduction is only made for un-authorized absent which is done as per law.															
J: Were appropriate records available to	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No															

verify hours of work and wages?		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The facility shows all real records which reflect all scenarios.	
M: Is there a defined living wage: <i>This is <u>not</u> normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility did not define living wages as it is not required by law.	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not applicable	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: There are no periodic reviews of wages.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Facility gives increment, promotion based on performance and skill at work.	

Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input checked="" type="checkbox"/> Other Q1: If other, please explain: Facility provide salary through Bkash (80%) and Cash (20%)
--------------------------	--

## 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 **all** of the following are met:

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

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

## Current Systems and Evidence Examined

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

### Current systems:

- Through employees' interview, overtime is voluntary.
- Working hour is recorded by electronic punch card.
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday.
- Salary sheet and timecard review were July 2020 (Currently Paid Month), February 2020 (Random Month) and November 2019 (Random Month).

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

Details:

- Employees' interviews
- Management interview
- local laws

- Facility policy on working hours
- Salary sheet
- Payslip
- Job card
- Attendance register
- Production record
- Quality and production records to cross check hours
- The time frame for record reviewed are as follows

**Working hour information:**

2 hours/day,  
12 hours/week,  
50 hours/month in July 2020 (Current paid Month)

2 hours/day,  
12 hours/week,  
48 hours/month in February 2020 (Random Month)

2 hours/day,  
12 hours/week,  
50 hours/month in November 2019 (Random Month)

Any other comments: None

**Non-compliance:**
**1. Description of non-compliance:**

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** None

**Objective evidence observed:**

None observed

**Observation:**

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** None

**Objective evidence observed:**

None observed

**Good Examples observed:**

**Description of Good Example (GE):** None observed

**Objective evidence observed:**

None observed

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

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:  <i>Not applicable</i>
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: If yes, please give details:  As per Circular on 16 July 2020 from Bangladesh Labour and Employment Ministry; Facility can do 4 hours overtime in a day and 24 hours overtime in a week with the consent of employees which is valid till 16 October 2020.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:  2 hours/day, 12 hours/week, 50 hours/month in July 2020 (Current paid Month)  2 hours/day, 12 hours/week, 48 hours/month in February 2020 (Random Month)  2 hours/day, 12 hours/week, 50 hours/month in November 2019 (Random Month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___40___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:  Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.



Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:</i>  200% of standard wages
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers &amp; frequency:</i> Overtime payments for 100% employees are as per legal requirement
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.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	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.	<input type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

## 7: No Discrimination is Practiced

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

### 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:

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for formation of trade union in the factory.

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

Details:

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

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: ____ 97 % A2: Female ____ 03%
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 such women present in the facility.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: No such evidence found

## Professional Development

A: What type of training and development are available for workers?

Orientation Training  
First Aid Training  
PPE Training  
Chemical Handling Training  
Health & Safety training  
Electrical Safety Training

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?

☒ Yes

☐ No

If no, please give details:

## 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

## 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:

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

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

#### Details:

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

Any other comments: None

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b>  None observed

## Responsible Recruitment

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

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: Not applicable
D: If any checked, give details:	Not applicable

<b>Migrant Workers:</b> <i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>		
A: Type of work undertaken by migrant workers:	There are no migrant workers in the facility.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Not Applicable. B2: Total number of (outside of local country) recruitment agencies used: Not Applicable.	
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable	C2: Observations: Not applicable
D: Are Any migrant workers in skilled, technical, or management roles  <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles: Not Applicable.	

## NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1 – If other, please give details: Not applicable, no fees required
C: If any checked, give details:	Not applicable, no fees required

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: There is no agency worker in the facility. And names if available: Not Applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Not applicable, site does not use agencies.

<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: Not applicable, site does not use agencies.</p>
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<p align="center"><b>Contractors:</b></p> <p><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>A1: If yes, how many contractors are present, please give details: Not applicable</p>
<p>B: If <b>Yes</b>, how many workers supplied by contractors?</p>	<p>Not applicable</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>C1: Please describe finding: Not applicable, No contractor on site</p>
<p>D: If <b>Yes</b>, please give evidence for contractor workers being paid per law:</p>	<p>Not applicable</p>



### 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:

- No Sub-contracting and Home-working was used by this facility.

**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**

Not applicable

Details:

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

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** None

#### Objective evidence observed:

*(where relevant please add photo numbers)*

None observed

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

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

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:

D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
E: How does the site ensure worker hours and pay meet local laws for homeworkers?		
F: What processes are carried out by homeworkers?		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No  G1: Please give details:	
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

## 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 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. The facility has a designated channel to conduct grievance handling procedure.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complaint box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has posted hotline & provided grievance box in washroom.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Details: Employee can place their grievance verbally or in written. Employee can also keep their identity confidential if required.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes  
☒ No

II: 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 has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Through the factory management and employees' interviews, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

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

Any other comments: None

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** None

#### Objective evidence observed:

(where relevant please add photo numbers)

None observed

### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** None

#### Objective evidence observed:

None observed

Good Examples observed:	
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b>  None observed

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

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

### Additional Elements

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

10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

### Current Systems and Evidence Examined

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

#### Current systems:

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

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

##### Details:

- Factory recruitment policy.
- Employees personal file.

Any other comments: None

### Non-compliance:

#### 1. Description of non-compliance:

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

None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** None

#### Objective evidence observed:

(where relevant please add photo numbers)

None observed

### Observation:

**Description of observation:** None observed

**Local law or ETI requirement:** Not applicable

**Comments:** None

#### Objective evidence observed:

None observed

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



## 10. Other issue areas 10B2: Environment 2–Pillar

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

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

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

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

## Current Systems and Evidence Examined

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

### Current systems:

- Facility has a written environmental policy.
- Facility has done environmental impact assessment.
- Facility has wastage agreement with the licensed vendor to provide different type of waste.

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

#### Details:

- Facility environment policy and procedure
- Environment management system documents
- Air and noise test report.
- Contract for wastage disposal

Any other comments: None

## Non-compliance:

### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

**Local law and/or ETI requirement:** Not applicable

**Recommended corrective action:** None

### Objective evidence observed:

None observed

## Observation:

**Description of observation:** None observed

**Local law or ETI/additional elements requirement:** Not applicable

**Comments:** None

### Objective evidence observed:

None observed

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

## Appendix 1

<p><b>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."</b></p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p><b>NOTE:</b> The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.</p> <p>0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.</p> <p>5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p><b>B.4. Compliance Requirements</b></p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>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.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	



### 10C. Compliance Requirements

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

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

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

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

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

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

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




### 10C. Guidance for Observations

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

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

## Photo Form

### Non-Compliance Photo:

		
NC Photo-1: Needle guard was found displaced.	NC Photo-2: Eye guard was found displaced with over lock machine.	NC Photo-3: Employees were found blocked.

### Observation photo:

Nil	Nil	Nil
N/A	N/A	N/A

### Good Example Photo:

Nil	Nil	Nil
N/A	N/A	N/A

### General Photos:

		
Facility Name	Facility's Main Gate	Lateral view of the Production Shed





Security Check Post



Sample Section



Cutting Section



Sewing Section



Iron Section



Folding Section



Packing Section



Personal Protective Equipment  
Used During Work



Eyewash Station



Spot Removing Room



Finished Goods Store















Accessories Store















		
Fabric Warehouse	Drinking Water Facility	Industrial Exhaust Fan
		
Toilet Area	Canteen	Grievance / Complain Box
		
Personal Locker	Dining Area	Child Care Room
		
Medical room	First aid box	First Aider



		
<p>Safety Board</p>	<p>In &amp; Out Time Recorder</p>	<p>Notice Board</p>
		
<p>Public Address System</p>	<p>Fire Alarm Call Point</p>	<p>Fire Alarm</p>
		
<p>Fire Extinguisher</p>	<p>Firefighting Equipment</p>	<p>Fire Hose Pipe</p>
		
<p>Fire Hose Pipe Pressure Check</p>	<p>Fire Hydrant Pump</p>	<p>No Smoke Sign Posted</p>



		
Smoke Detector	Fire Detection Control Panel	Rescue Team Member Identification
		
Firefighting Team Member Identification	Emergency Light	Industrial Emergency Light
		
Evacuation Plan	Primary Aisles Mark	Secondary Aisles Mark
		
Exit Sign	Exit Door	Staircase



Emergency Assembly Area



Boiler



Compressor



Generator



Electric Sub-station



Electrical Distribution Board



COVID-19 Preparedness



COVID-19 Preparedness



COVID-19 Preparedness



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[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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