



Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details

Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 173630350	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 403626466
Business name (Company name):	Shafi Knit Ltd.		
Site name:	Shafi Knit Ltd.		
Site address: <i>(Please include full address)</i>	Natun Para, Baipail, Ashulia, Savar, Dhaka.	Country:	Bangladesh
Site contact and job title:	Md. Shahab Uddin, Manager (Admin, HR & Compliance)		
Site phone:	+88-01737635152	Site e-mail:	shafiknithr@gmail.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	January 26th , 2019		

Audit Company Name & Logo:



Report Owner (payee): Shafi Knit Ltd.
(If paid for by the customer of the site please remove for Sedex upload)

Audit Conducted By

Commercial	<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 6.0 April 2017 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):

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

Lead auditor: Md. Hashmot Ali

Team auditor: Ruhul Amin & Nazrul Islam

Interviewers: Md. Hashmot Ali, Ruhul Amin & Nazrul Islam

Report writer: Md. Hashmot Ali

Report reviewer: Jesús Carlos Mora Vargas

Audit Company Report Reference: SIPAS CR-PERÚ S.A & Signet, SIPAS-BD-012/19

Date of declaration: January 26th , 2019

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

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

Non-Compliance Table

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	<u>Universal Rights covering UNGP</u>			<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> Summary of Observation finding 1 Summary of Observation finding 2 Summary of Good Example finding 1 Summary of Good Example finding 2
0B	<u>Management systems and code implementation</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	04			<ul style="list-style-type: none"> Facility has started to do internal audit in their facility against compliance requirements, But the audit report is not detailed or not with clear explanation with all minor / major elements or observations only categorise the issue is YES or NO which is not clear to understand the actual situation. Facility does not provides handbook to its employees. Management using two (02) diesel generator without having the legal permission from concern authority. Also noted that, Group Insurance, BKMEA & BBMEA membership certificate has

									<p>been expired on December 31, 2018. However, management applied to concern authority for renewal and expecting to get these license & permission form concern authority of government.</p> <ul style="list-style-type: none"> Facility has the monitoring system to their own supplier against social standards but not for all of their listed suppliers and report also not in detail with mentioning the crucial elements whether they have or not. Summary of Observation finding 1 None observed Summary of Good Example finding 1 None observed
1.	<u>Freely chosen Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
2	<u>Freedom of Association</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	01			<ul style="list-style-type: none"> Participation committee has formed by the election process as well as meeting of this committee conducted and kept minutes of the meeting regularly but general workers are not well aware about this existing participation committee and don't know who are their representatives.
3	<u>Safety and Hygienic Conditions</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04			<ul style="list-style-type: none"> Fighters are not well aware/trained

									<ul style="list-style-type: none"> about their responsibility in case of any fire incident and not well aware about operating the fire fighting equipment's. No secondary containment found for machine oil drum kept in front of maintenance room and spot removing area where using thinner. There is a medical centre inside the facility but full time doctor / medical officer are not recruited here. Recruited/ existing medical officer coming or doing his duty 02 days in a week instead of 06 days. Management does not provides any canteen facilities for the employees.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	01		01	<ul style="list-style-type: none"> Facility management does not provides payment slip to employees. <i>Summary of Good Example finding 1</i> Facility provides attendance bonus to workers.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> None observed

8	<u>Regular Employment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01			<ul style="list-style-type: none"> Facility does not provides contract / appointment letter to the employees who are working since more than one month in the facility.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> None observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> N/A
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> N/A
General observations and summary of the site:									

**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:	Shafi Knit Ltd.	
B: Site name:	Shafi Knit Ltd.	
C: GPS location: (if available)	GPS Address: Natun Para, Baipail, Ashulia, Savar, Dhaka.	Latitude: Longitude:
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Factory License No: 14442/Dhaka - valid up to June 30th, 2019 Trade License No: 004178, valid up to June 30th, 2019 Fire license No: DD/Dhaka/22001/2010, valid up to June 30th, 2019. BKMEA Membership Certificate No: 1692-C/2011, Expired on December 31st, 2018 BGMEA Membership Certificate No: 6088, Expired on December 31st, 2018 Certificate of Compensation/ Insurance benefit: DHK-577/2018, Expired on December 31st, 2018. ERC : RA 0095572 valid up to June 30th, 2019. IRC : BA 114547 valid up to June 30th, 2019. EPB : BD01810 Valid Up To June 30th, 2019. Incorporation Certificate No: C-67/85 (4677)07 TIN: 1203 7738 2060/Circle-24(Companies) Boiler License: BA BO- 10229 & BA BO- 10230, Valid Up To July 03, 2019.</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	Knit Garment Manufacturer (Cutting, Sewing, Iron, Finishing, Packing & Export)	

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

Shafi Knit Ltd. is located at Natun Para, Baipail, Ashulia, Savar, Dhaka, Bangladesh. The facility is of 01 building & 03 shed for its activities. There are total area is about 22620 square feet and ware house are is 1400 square feet. There are total 571 employees in the facility with 341 male and 257 female employees. Out of the total 571 employees, 48 are the Non-production employees and 523 are the production employees. The detailed description of this site is given below:

Production Building no 01	Description	Remark, if any
Floor 1	Cutting section, Store & Office	
Floor 2	Office, Finishing section, boiler	
Floor 3	Sewing section	
Floor 4	Sewing section	
Roof top	Prayer room and open space	
Shed 01	Dining hall, Medical centre & child care centre	
Shed 02	Yarn store, sample section	
Shed 03	Generator, Electric sub station	
Is this a shared building?		NO

Visible structural integrity issues (large cracks) observed?

☐ Yes

☒ No

Please give details:

Does the site have a structural engineer evaluation?

☒ Yes

☐ No

Please give details:

G: Site function:

- ☐ Agent
- ☒ Factory Processing/Manufacturer
- ☐ Finished Product Supplier
- ☐ Grower
- ☐ Homeworker
- ☐ Labour Provider
- ☐ Pack House
- ☐ Primary Producer
- ☐ Service Provider

	<input type="checkbox"/> Sub-Contractor																																																															
H: Month(s) of peak season: (if applicable)	N/A																																																															
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Cutting, Sewing, Iron, Finishing, Packing & Export.</p> <p>Main equipment using in the facility</p> <table border="1"> <thead> <tr> <th>Sl. No.</th><th>Name of Machine</th><th>Qty.</th></tr> </thead> <tbody> <tr><td>01.</td><td>Plane machine (Sewing)</td><td>150</td></tr> <tr><td>02.</td><td>Over lock Machine</td><td>85</td></tr> <tr><td>03.</td><td>Bar tack machine</td><td>05</td></tr> <tr><td>04.</td><td>Kansai special machine</td><td>02</td></tr> <tr><td>05.</td><td>Flat lock machine</td><td>45</td></tr> <tr><td>06.</td><td>Feed of the arm machine</td><td>02</td></tr> <tr><td>07.</td><td>Pikotin</td><td>01</td></tr> <tr><td>08.</td><td>Button hole</td><td>04</td></tr> <tr><td>09.</td><td>Button stich machine</td><td>03</td></tr> <tr><td>10.</td><td>Snap button machine</td><td>04</td></tr> <tr><td>11.</td><td>Grinding machine</td><td>01</td></tr> <tr><td>12.</td><td>Fusing machine</td><td>01</td></tr> <tr><td>13.</td><td>Thread sucking machine</td><td>01</td></tr> <tr><td>14.</td><td>Hit seal machine</td><td>01</td></tr> <tr><td>15.</td><td>Cutting machine</td><td>04</td></tr> <tr><td>16.</td><td>Compressor</td><td>01</td></tr> <tr><td>17.</td><td>Blind stitch machine</td><td>01</td></tr> <tr><td>18.</td><td>Generator (Diesel)</td><td>02</td></tr> <tr><td>19.</td><td>Boiler (Electric)</td><td>02</td></tr> <tr> <td colspan="2">Total</td><td>314</td></tr> </tbody> </table>	Sl. No.	Name of Machine	Qty.	01.	Plane machine (Sewing)	150	02.	Over lock Machine	85	03.	Bar tack machine	05	04.	Kansai special machine	02	05.	Flat lock machine	45	06.	Feed of the arm machine	02	07.	Pikotin	01	08.	Button hole	04	09.	Button stich machine	03	10.	Snap button machine	04	11.	Grinding machine	01	12.	Fusing machine	01	13.	Thread sucking machine	01	14.	Hit seal machine	01	15.	Cutting machine	04	16.	Compressor	01	17.	Blind stitch machine	01	18.	Generator (Diesel)	02	19.	Boiler (Electric)	02	Total		314
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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 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 If Yes approx. % of workers																																																															
N: Were all site provided accommodation buildings included in	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																																																															

this audit	If No, please give details: The site did not provide accommodation to employee.
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Audit Parameters

A: Time in and time out	Day 1 Time in: 09: 40 Day 1 Time out: 18: 50	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	Three auditors in one day (Total 03 audit days)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input 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: 02 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Shahab Uddin, Manager (Admin, HR & 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:	February 3 rd , 2018		
J: Previous audit type:	Full audit		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		

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

C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No union was formed at this factory		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	314	0	0	0	0	0	0	314
Worker numbers – female	257	0	0	0	0	0	0	257
Total	571	0	0	0	0	0	0	571
Number of Workers interviewed – male	20	0	0	0	0	0	0	20
Number of Workers interviewed – female	22	0	0	0	0	0	0	22
Total – interviewed sample size	42	0	0	0	0	0	0	42

A: Nationality of Management	Bangladeshi
B: Nationality of workers <i>Please add more rows as applicable</i>	Countries: Country 1: Bangladeshi (100%) Country 2: _____ Country 3: _____
C: For the majority nationality of workers:	Nationality 1 Bangladeshi - 100 % total workforce Nationality 2 approx % total workforce _____ Nationality 3 approx % total workforce _____
D: Worker remuneration (management information)	_____ % workers on piece rate _____ % hourly paid workers _____ 100 _____ % salaried workers Payment cycle: _____ % daily paid _____ % weekly paid

	__100__% monthly paid _____% other If other, please give details
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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>	30 (5 person* 6 groups)	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 06	Female: 06
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?	Payment is on time, Management behaviour is positive, working environment is good	
J: Any additional comment(s) regarding interviews:	In interview session workers explained that, they got monthly payment on time, correct overtime payment, attendance bonus and paid leave whenever they needed.	
K: Attitude of workers to hours worked:	Positive	
L. Is there any worker survey information available?		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details:		
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>		

12 employees were selected from various workstation and payroll sheet for individual interview and 30 employees in 6 (6X5) groups were selected for group interviews. Attitude of interviewee to management, workplace and the interview process was positive. The interview session was private and confidential.

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

Workers representatives showed positive attitude regarding management, workplace and the interview process.

O: Attitude of managers:

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

Md. Shahab Uddin, Manager (Admin, HR & Compliance), and his team showed the positive attitude to this audit. They were very much cooperative with this audit.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The factory established the relevant documents and rules.
- There is an internal audit team for quality who in addition take on the role for internal audit of the code though need here some improvements with this audit, overall responsibility for standards is taken by Md. Shahab Uddin, Manager (Admin, HR & Compliance).
- Workers can report any grievances (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the worker in question.
- The factory encouraged the workers and staff to report any issues related to employee universal rights by name or anonymous.

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

Details:

- The relevant policy about employee universal rights.
- Internal grievance procedure documentation.
- Training records

Any other comments: No Comments

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details (mainly applicable for the parent company): The factory showed one commitment on the employee universal rights issued by manager as well as approved by the owner with the company chop.
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: Md. Shahab Uddin Job title: Manager (Admin, HR & Compliance)
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The procedure required and encouraged the workers or stakeholders to report the any issue related to employee universal rights with full protection.
D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy and procedures concerning to the privacy protection was provided for review. The HR department did not have any improper practices according to this requirement.

Findings		
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: None observed Local law or ETI/Additional elements / customer specific requirement: None observed Comments: None observed		Objective evidence observed: None observed

Good examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

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)	Last year: __5.0__ %	This year __4.0__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	3.0%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	Last year: __4.0__ %	This year __3.0__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	3.0%	2.0%
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Facility maintaining the accident and injury register by medical department.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	Last year: 2017 Number: 03	This year: 2018- January 2019 Number: 03
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]	03	02
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year: 0	This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months __0__% workers	12 months __0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months __0__% workers	12 months __0__% workers

0B: Management system and Code Implementation

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

- 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:

- According to the documents review the facility has established a system to deliver compliance to the code which includes child labour prohibition system and overtime work control system. All the interviewees understood the basic components of the code such as do not use child labour and the control of working hours.
- The company appointed a management representative - Md. Shahab Uddin, Manager (Admin, HR & Compliance) for compliance implementation.

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

Details:

- Client's code of conduct at the factory.
- A manual created by the factory which contained all required documents and all appropriate procedures for meeting the client's code of conduct and the legal requirements.
- Training records

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report

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

Please give details: No such record was noted in any public information channel as long as auditor fully acknowledge. And this was confirmed through employees and management interview.

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 Please give details: The factory established policies and procedures on forced labour, child labour, discrimination, harassment & abuse and no negative evidence was found.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The factory had established the related policy and provided the training to all related workers to make sure the policy effectively, that was also confirmed via interview with workers and management staffs.
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 Please give details: Based on worker and management interview, they know the policies well.
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 Please give details: The factory provided the training to management and workers. The related record was provided for review. For example: The last date of Occupational Health and Safety training: 10/01/2019 The last date of First Aid training: 17/01/2019 The last date of PPE training: 03/01/2019
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: ISO 9001:2015
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Md. Shahab Uddin, Manager (Admin, HR & Compliance) is responsible for HR related issues in the factory
H: Is there a senior person /manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Please give details: Md. Shahab Uddin, Manager (Admin, HR & Compliance), is responsible for implement of the ETI code.
I: Is there a policy to ensure all worker information is confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The information and privacy protection procedure was available for review.
J: Is there an effective procedure to ensure confidential information is kept confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	Please give details: The information and privacy protection procedure was available for review.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had the risk assessment including procedure and assessment records.
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 Please give details: 1. The factory assessed the risks related all aspects of the ETI code, eg. Working hours, wages & benefits, harassment, discrimination, ethics, H&S, environment issue. 2. The control methods were advised and implemented if the middle or high risks were identified.
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 Please give details: The factory had supplier management procedure with requirements of ETI code but they need to increase the supplier monitoring system in detail.
Land rights	
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 Please give details: The factory has all legal license and permissions from the concern authority.
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 Please give details: The factory set up the procedure and appointed executive department to conduct legal due diligence to recognize and apply 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: The facility has written policy on land rights; however it is not included any due diligence the company will undertake to obtain free, prior and informed consent.
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 Please give details: The management stated as well as shown the documents that, this is their

	own building and they can built or expanded as per their needed.
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 Please give details: This area was provided by local government as Commercial/ industry area.
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 Please give details: All the process of building was legal according to the interview and document review.

Non-compliance:

1. Description of non-compliance:

- ☒ NC against ETI/Additional Elements
☐ NC against customer code:

It was noted through Documents review and management interview that, facility has started to do internal audit in their facility against compliance requirements, But the audit report is not detailed or not with clear explanation with all minor / major elements or observations., only categorise the issue is YES or NO which is not clear to understand the actual situation.

Local law and/or ETI requirement:

0.44 (Management systems and Site's Management system & Monitoring)
Inadequate system to check the sites performance against compliance requirements e.g. internal audits not conducted regularly or missing crucial elements.

Recommended corrective action:

Facility Management shall make internal audit report with detail / sufficient information. Management agreed to do this properly.

2. Description of non-compliance:

- ☒ NC against ETI/Additional Elements
☐ NC against customer code:

It was noted through management and workers interview that, facility does not provides handbook to its employees.

Local law and/or ETI requirement:

0.47 (Management systems and Sites Management systems & Monitoring),
Inadequate staff handbook issued where required

Recommended corrective action:

Facility Management shall provide employee handbook to all.

Objective evidence observed:

Documents review and management interview

Management and workers interview

3. Description of non-compliance:

- ☒ NC against ETI/Additional Elements
☐ NC against customer code:

☒ NC against Local Law

It was noted through Documents review, plant tour and management interview that, currently management using two (02) diesel generator without having the legal permission from concern authority. Also noted that, Group Insurance certificate, BKMEA & BBMEA membership certificate has been expired on December 31, 2018. However, management applied to concern authority for renewal and expecting to get these license & permission form concern authority of government.

Local law and/or ETI requirement:

0.81 (Management systems and Site's license & certifications): Failure to provide other legally required documentation.

In accordance with Bangladesh Energy Regulatory Commission Act, 2003; section 27 (1) No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Ac such as;

- a)Power Generation b)Energy Transmission c) Energy distribution and marketing
d)Energy supply and e)Energy Storage

Recommended corrective action:

Facility Management shall obtained all legal license and permissions from concern authority and keep them up to date. Management agreed to arrange them shortly.

4. Description of non-compliance:

- ☒ NC against ETI/Additional Elements
☐ NC against customer code:

☐ NC against Local Law

It was noted through Documents review and management interview that, facility has the monitoring system to their own supplier against social standards but not for all of their listed suppliers and report also not in detail with mentioning the crucial elements whether they have or not.

Local law and/or ETI requirement:

0.86 (Management systems and Site's systems to manage supplier compliance)
Inadequate system in place to monitor the sites own suppliers against standards e.g. missing crucial elements.

Recommended corrective action:

Facility Management shall do the proper monitoring system to all of their suppliers with detail observation report. Management agreed to do this properly.

Documents review, plant tour and management interview

NC Photo no: 01

Documents review and management interview

Observation:	
Description of observation: None observed Local law or ETI requirement: None observed Comments: None observed	Objective evidence observed: None observed

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

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

- Based on interview with the management & workers and document review, it was identified that the factory had established the employment policies & program.
- The employees obtained their job by HR market or by friend's recommendation.
- Based on the workers and management interviews, the workers were free to leave after work shift, and there was no bonded or involuntary prison labour identified.
- The terms and conditions of employment in the policy state that the workers are free to leave the workplace outside of their working hours.
- The workers weren't required to lodge ID card or other certificates when recruitment

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

Details:

- The facility established a policy to ensure employment is freely chosen, and all the relevant documents were provided for review
- Personnel files
- Contracts to establish notice periods.
- Management interview and employee interview.
- Facility tour showed no sign of employees being under pressure.

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:
C: Is there any evidence of	<input type="checkbox"/> Yes

retention of wages /deposits	<input checked="" type="checkbox"/> No 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 Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there is a published 'modern day slavery statement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: N/A <input checked="" type="checkbox"/> Not applicable
G: 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 Please describe finding:
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected: <input checked="" type="checkbox"/> Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: The site has the written policy as preventive action of any kind of forced labour.

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

None observed

Recommended corrective action:

None observed

Objective evidence observed:

None observed

Observation:

Description of observation: None observed Local law or ETI requirement: None observed Comments: None observed	Objective evidence observed: None observed
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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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- The Bangladesh constitution guarantees Freedom of Association; and Bangladesh Labour Law has given the rights to workers to form an association. If 30% workers in the same factory wants to form an association, they can apply directly to the government.
- There is no union in the factory.
- By workers interview, it was noted that workers could raise their complaint to the supervisor directly or through worker representatives which formed by election process.

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

Details:

- Rights to make complaint and suggestion by written or verbal procedure
- Complaint and suggestion handling record.
- Freedom of Association policies.

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

A: 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
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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 Describe: Workers can contact and talk to management directly and via welfare/ compliance officer. Also have the suggestion/ complain box in the confidential area of the factory. Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: There was a room in the office section was specific for that purpose.	
F: Name of union and union representative, if applicable:	N/A	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?	Participation Committee	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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Though this committee has formed by the election process but all worker are not well aware about their representatives. Need to provide more training and share the meeting minutes to all workers for increase the awareness about this participation committee.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: Last election date of this participation committee was February 27 th , 2017.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Discuss about the new wages which declared recently by the government. Also discussed how to make the committee more effective.
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , 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.	Confirmed with worker representative interview and worker interview that, there is a workers committee which established by the election process.	
M: Are any workers covered by	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Collective Bargaining Agreement (CBA)?		
If Yes , what percentage by trade Union/worker representation	____% workers covered by Union CBA	____% workers covered by worker rep CBA
If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	

Non-compliance:

1. Description of non-compliance:

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

It was noted through documents review, management & workers interview that, participation committee has formed by the election process as well as meeting of this committee conducted and kept minutes of the meeting regularly but general workers are not well aware about this existing participation committee and don't know who are their representatives are.

Local law and/or ETI requirement:

2. 220 (Freedom of Association and Collective Bargaining & Effectiveness of Representation Body), A committee exists but workers do not know about the worker committee/ Its function and / or who their representatives are.

Recommended corrective action:

Facility Management shall provide training to all employees working in the facility about participation committee. Management agreed to do this.

Objective evidence observed:

Documents review, management & workers interview

Observation:

Description of observation:

None observed

Local law or ETI requirement:

None observed

Comments:

None observed

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE):

None observed

Objective evidence observed:

	None observed
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3: Working Conditions are Safe and Hygienic

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management
 - Potable water was freely available in all areas.
 - Enough clean toilets segregated by gender were available at all times to workers.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Minutes of meetings show that there are monthly meetings between the H&S committee (workers) and the H&S manager, and each point is acted on.
2. Fire Safety
 - There were at least 2 exits from each work area and were clearly marked.
 - Fire fighting equipment was adequate and checks were up-to-date.
 - Evacuation plans were posted in all areas and understood by all workers interviewed though need some improvement here about the training.
 - Fire drill was organized and recorded twice per year at least.
3. Electrical and machine safety
 - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - There were competent electricians at the site and their training certificates were available for review.
 - Did not have special equipment used on site.
4. Medical services
 - There were adequate first aid kits in each production area and they were well stocked.
 - There were one first aid personnel, they confirmed they had been trained at a local Red Cross.
5. Chemical safety
 - Most chemicals were correctly labelled.
 - This site has not any wet process, nevertheless they are using some chemical like machine oil, Thinner etc and secondary containment found missing there though material Safety Data Sheets were found available for those chemical.

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

Details:

- Facility tour
- Management interview and employee interview
- Health and safety policy
- Health and safety committee minutes
- Training records and certificates
- Fire equipment maintenance records
- Fire drill records
- Government licenses and checks on air quality and noise level
- Building structure safety certificates
- Fire safety certificates
- Trained first aid personnel register
- Accident reports
- Chemical list and MSDS for chemical
- Potable water testing certificates
- Interviews with H&S manager
- Interviews with workers and H&S committee members
- Special equipment inspection report and operators' certificate
- catering service license for its kitchen and canteen staff health certificate

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

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 <p>Please give details: The facility set up the policy and procedures and provided training including for those new workers.</p>
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: The policies related to health and safety included in the employee manual/handbook, though handbook are not provides to all employee.</p>
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Please give details:</p>
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

	Please give details: During any visit by others party, management inform them about H&S issues.
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 Please give details: Facility set up a medical room with equipped well.
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 Please give details: The facility appointed a nurse and Doctor with sufficient first aid kits inside as well. However, doctors are not coming whole weeks, only 02 days come instead of 06 days.
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 Please give details: N/A
H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory performed risk assessment for the workplace and based on different sections people.
I: Are H&S Risk assessments 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 Please give details: The factory performed risk assessment for the workplace and based on different sections people.
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 Please give details: The factory provided all inspection report or legal certificate for review.
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 Please give details: This is only cutting to finishing process site where not have any wet process.

Non-compliance:

1. Description of non-compliance:

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

It was noted through interview with fire fighter's and plant tour that, they are not well aware/trained about their responsibility in case of any fire incident and not well aware about operating the fire fighting equipment's.

Local law and/or ETI requirement

3. 354 (Health, Safety and Hygiene & Fire Safety - Licenses, Inspections & Training), No / Inadequate records for fire safety training / Evacuation training etc.

In accordance with Bangladesh Labour rules 2015, clause 55 (10) If possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable fire-repellent instruments.

Recommended corrective action:

Facility Management shall arrange proper training (from concern authority as well as internal) for all fire fighters. Management agreed to do this.

2. Description of non-compliance:

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

It was noted through plant tour that, no secondary containment found for machine oil drum kept in front of maintenance room and spot removing area where using thinner.

Local law and/or ETI requirement:

3. 371 (Health, Safety & hygiene & Chemical), No / inadequate spill kit provided for handling chemical spillage and leakage.

Recommended corrective action:

Facility Management shall provide secondary containment for all chemical using in the facility.

3. Description of non-compliance:

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

It was noted through Plant tour and management interview that, there is a medical centre inside the facility but full time doctor / medical officer are not recruited here. Recruited/ existing medical officer coming or doing his duty 02 days in a week instead of 06 days.

Local law and/or ETI requirement:

Objective evidence observed:

Interview with fire fighter's

plant tour
NC Photo no: 02 & 03

Plant tour and
management interview

<p>3. 466 (Health, Safety and Hygiene & Worker health), No / inadequate medical facilities which does not meet legal requirement.</p> <p>Recommended corrective action:</p> <p>Facility management shall arrange full time medical officer/ doctor inside the facility.</p> <p>4. Description of non-compliance:</p> <p><input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>It was noted through plant tour that, management does not provides any canteen facilities for the employees.</p> <p>Local law and/or ETI requirement:</p> <p>3.490 (Health, Safety and Hygiene and Hygiene Facilities & Housekeeping), No canteen facility provided as per local law.</p> <p>In accordance with Bangladesh Labor Law 2006, Chapter- 8, Section – 92, in any establishment wherein more than one hundred workers are ordinarily employed, an adequate canteen shall be provided for the use of workers.</p> <p>Recommended corrective action:</p> <p>Facility Management shall arrange canteen facility for the employees. Management agreed to do this as soon as possible.</p>	<p>Plant tour</p>
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Observation:	
<p>Description of observation:</p> <p>None Observed</p> <p>Local law or ETI requirement:</p> <p>None Observed</p> <p>Recommended corrective action:</p> <p>None Observed</p>	<p>Objective evidence observed:</p> <p>None Observed</p>

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

4: Child Labour Shall Not Be Used

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Based on documents checking, the factory kept valid and enough age information such as copies of ID card. And personal files showed that no child labour or young worker was identified in the factory.
- Based on document review and workers interview, no child labour or young worker was found in the factory.
- Based on workers interview, HR staff interviewed with them and checked their ID cards.
- Based on onsite observation, there was no child labour found.

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

Details:

- Facility tour
- Management interview and employee interview.
- The employee's personnel files were provided for review. Each file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth.
- The facility's policy on child labour was reviewed. It states that the facility will never employ and use any child labour under the age of 18 years old.

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

A: Legal age of employment:	Legal minimum: 18 years old
B: Age of youngest worker found:	20 years old
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? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details: N/A

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed Local law and/or ETI requirement: None Observed Recommended corrective action: None Observed	Objective evidence observed: None Observed
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Observation:

Description of observation: None Observed Local law or ETI requirement: None Observed Comments: None Observed	Objective evidence observed: None Observed
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Good Examples observed:

Description of Good Example (GE): None Observed	Objective Evidence Observed: None Observed
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5: Living Wages are Paid

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- The local legal minimum wage was BDT. 8000
- All workers' wages were calculated by monthly rate. They were paid as minimum wage was taka 8000/month.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about their wages for the pay period concerned each time that they are paid.
- The factory management compensated all workers at a legal mandated rate for their overtime hours, respectively 200% of regular pay for overtime work on working days, rest days and statutory holidays.
- All workers were paid within seven working days after completion of wage period.

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

Details:

- Production records: inspection records and material delivery records.
- Management and Employee interviews
- Recent 3 months' social insurance receipts
- Working hour policy
- Wages policy
- Leave management policy

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

Non-compliance:

1. Description of non-compliance:

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

It was noted through interview with management and workers that, Facility management does not provides payment slip to employees.

Local law and/or ETI requirement:

5. 613 (Record keeping and documentation), No pay stubs / payslips were provided to employees.

Recommended corrective action:

Facility Management shall ensure that, all employees are getting the payment slip on each month.

Objective evidence observed:

Management and workers interview

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

It was noted that, facility provided attendance bonus to workers.

5.648 (Wages and Benefits & Insurance), Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport

Objective Evidence Observed:

Documents review, Management and workers 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: 48 hours/week	Legal maximum: 48 hours/week	<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: 12 hours/week	Legal maximum: 12 hours/week	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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: BDT8000/month	Legal minimum: BDT8000/month	<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: 200% of basic wage	Legal minimum: 200% of basic wage	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)																																																																
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																															
If No , why not?	N/A																																																															
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)	42 samples from December 2018 (Recent month) 42 samples from May 2018 (Random month) 42 samples from January 2018 (Random month)																																																															
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div> If Yes, please give details: <table border="1"> <thead> <tr> <th>Grade</th> <th>Basic</th> <th>House Rent</th> <th>Medical</th> <th>Conveyance</th> <th>Food Allowance</th> <th>Gross Salary</th> </tr> </thead> <tbody> <tr><td>1</td><td>10938</td><td>5469</td><td>600</td><td>350</td><td>900</td><td>18257</td></tr> <tr><td>2</td><td>9044</td><td>4522</td><td>600</td><td>350</td><td>900</td><td>15416</td></tr> <tr><td>3</td><td>5330</td><td>2665</td><td>600</td><td>350</td><td>900</td><td>9845</td></tr> <tr><td>4</td><td>4998</td><td>2499</td><td>600</td><td>350</td><td>900</td><td>9347</td></tr> <tr><td>5</td><td>4683</td><td>2342</td><td>600</td><td>350</td><td>900</td><td>8875</td></tr> <tr><td>6</td><td>4380</td><td>2190</td><td>600</td><td>350</td><td>900</td><td>8420</td></tr> <tr><td>7</td><td>4100</td><td>2050</td><td>600</td><td>350</td><td>900</td><td>8000</td></tr> <tr><td>Apprentice</td><td>2750</td><td>1375</td><td>600</td><td>350</td><td>900</td><td>5975</td></tr> </tbody> </table> </div>	Grade	Basic	House Rent	Medical	Conveyance	Food Allowance	Gross Salary	1	10938	5469	600	350	900	18257	2	9044	4522	600	350	900	15416	3	5330	2665	600	350	900	9845	4	4998	2499	600	350	900	9347	5	4683	2342	600	350	900	8875	6	4380	2190	600	350	900	8420	7	4100	2050	600	350	900	8000	Apprentice	2750	1375	600	350	900	5975
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7	4100	2050	600	350	900	8000																																																										
Apprentice	2750	1375	600	350	900	5975																																																										
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 <div> If No, please give details: </div>																																																															

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 checked="" type="checkbox"/> Above	Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>	
F: Please indicate the breakdown of workforce per earnings:		___% of workforce earning under min wage __30__% of workforce earning min wage __70__% of workforce earning above min wage	
F: Bonus scheme found: Please specify details:	Bonus Scheme found: Monthly attendance bonus; BDT 400 for Operators and BDT 300 for Assistant operators / helpers. <i>Note: full time employees and /month.</i>		
H: What deductions are required by law e.g. social insurance? Please state all types:	Only unauthorised absent deduction.		
I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please list all deductions that have been made.	1. Unauthorised absent deduction. Please describe: Only unauthorised absent deduction made by the management by following the legal requirements.
		Please list all deductions that have not been made.	1. any kinds of leave 2. authorized absent Please describe: Not have been made any deductions for any kinds of leave & authorized absent.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Regular hours of worked are recorded 08 hours, including attend any awareness meetings.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time: The facility yet not calculate the living wages.		

<p>If yes, what was the calculation method used.</p>	<p> <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: </p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per law, the facility made a policy about increment of worker's salary after one year of job completion. The payroll department is responsible to ensure the increment of workers and verify unauthorized deduction before payment. </p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Literally workers with equal job responsibility are treated as same and their payment is also same, but it fluctuates when ones' job life/duration is more than another. </p>
<p>Q: How are workers paid:</p>	<p> <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other, please explain: </p>

6: Working Hours are not Excessive

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- According to workers interview and time records, working time was arranged from 08:00 am to 05:00 Pm Overtime was arranged from 05:00 pm to 07:00 pm.
- Working hours was recorded by manual card / attendance system, the factory provided attendance records from April, 2018 to the audit day.
- Based on the working time records, all employees had one day off in every 7 days.
- Based on the working time records, the most weekly working hours was 60 hours (including 02 hours overtime).

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

Details:

- Employee interview
- Management interview

- Factory policy on working hours
- Time cards record
- Quality and production records to cross check hours

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

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:

None Observed

Recommended corrective action:

None Observed

Objective evidence observed:

None Observed

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

None Observed

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Manual time card/ recording system.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, please detail hours, %, types of workers affected and frequency Please give details: The labour contracts presented by the site stated the working hours complied with local legal requirements. 100% of all employees' labour contracts had this clause.			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	Please select all applicable: <input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:		Is this allowed by local law? <input type="checkbox"/> Yes <input type="checkbox"/> No		
	Maximum number of days worked without a day off (in sample):				
	6 days consecutive working was noted in all samples				

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	If yes, please give details:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	12 hours/week in December 2018 12 hours/week in May 2018 12 hours/week in January 2018
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:	_50_%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: The procedure and policy stated the workers had right to work voluntary. No restricted clause was found in any document read onsite, eg. Labour contracts, procedures and regulations.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of standard wages:
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe % of workers & frequency: 200% of normal wage for overtime on workdays; 200% of normal wage for overtime on rest days; (Found that workers did not work on Friday/ holidays.)

<p>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.</p>	<div data-bbox="408 217 1500 387"> <input checked="" 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 </div> <div data-bbox="408 409 1500 477"> Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other </div> <div data-bbox="408 533 1500 566"> The local law required the OT wages should be comply with legal requirements. </div>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<div data-bbox="408 719 1500 889"> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </div> <div data-bbox="408 911 1500 978"> Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other: </div> <div data-bbox="408 990 1500 1057"></div>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<div data-bbox="408 1086 1500 1153"> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div data-bbox="408 1153 1500 1176"> If yes, please give details: </div> <div data-bbox="408 1176 1500 1350"></div>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<div data-bbox="408 1377 1500 1444"> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div> <div data-bbox="408 1444 1500 1637"></div>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- According to management interview and worker interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background etc.; female workers and male workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill; training was based on working requirement.
- No discrimination was found during the audit.

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

Details:

- The hiring and termination procedure leave application records and worker handbook.
- Payrolls records
- Attendance records
- Termination records
- Training records

Any other comments:

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: __95__ % Female __05__ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: N/A The factory manufacture was knit garments / cutting sewing and finishing process and no technical person (women) was found.
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 N/A

Professional Development	
A: What type of training and development are available for workers?	Skills training was provided to workers and if skilled workers were assigned to sampling workshop, which could bring them more income.

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

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed Local law and/or ETI requirement: None Observed Recommended corrective action: None Observed	Objective evidence observed: None Observed

Observation:	
Description of observation: None Observed Local law or ETI requirement: None Observed Comments: None Observed	Objective evidence observed: None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

None Observed

8: Regular Employment Is Provided

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

ETI

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

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

- The factory signed labour contracts for workers and provided one copy to them, though found some workers not get appointment/ contract letter yet.
- 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 subcontractor was used by factory.

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

Details:

- Hiring and termination procedure
- Labour contract
- Personal files
- Payroll records

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report

Non-compliance:

1. Description of non-compliance:

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

It was noted through documents review, management and workers interview that, Facility does not provides contract / appointment letter to the employees who are working since more than one month in the facility.

Local law and/or ETI requirement:

8.816 (Regular employment & Contract of Employment / Letter of appointment), Workers have not been given / do not have a copy of contracts or letter of appointments.

In accordance with Bangladesh Labour Law (Chapter 02, Section 5), No employer shall employ any worker without giving such worker an appointment letter.

Recommended corrective action:

Facility Management shall ensure that, all employees are getting contract/ appointment letter during recruitment and as soonest time.

Objective evidence observed:

Documents review, management and workers interview

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

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 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 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 – please give details
D: If any checked, give details:	

Migrant Workers:

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

A: Type of work undertaken by migrant workers:	There is no migrant workers in the facility.
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used: N/A

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 Please describe finding: N/A	Observations N/A
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 checked="" type="checkbox"/> No If yes number and example of roles: N/A	

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 – please give details
C: If any checked, give details:	N/A

Agency Workers (if applicable) <i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	Names if available: N/A
B: Were agency workers' age / pay	<input type="checkbox"/> Yes

/ hours included within the scope of this audit?	<input type="checkbox"/> No N/A
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A

Contractors:

Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,

A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	N/A
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: N/A
D: If Yes , please give evidence for contractor workers being paid per law:	N/A

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

- A site tour showed that all production processes were present in the unit.
- No homeworking was used by factory.
- No subcontractor was used by factory.

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

- Site tour (Calculation on total production and estimated capacity)
- Materials in/out records
- Management interview
- Worker interview

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

Process Subcontracted	Process 1	Process 2
Name of factory	N/A	N/A
Address	N/A	N/A

Process Subcontracted	Process 3	Process 4
Name of factory	N/A	N/A
Address	N/A	N/A

Process Subcontracted	Process 5	Process 6
Name of factory	N/A	N/A
Address	N/A	N/A

Details:

N/A

Any other comments: No comments

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1

of this report.

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 /Additional Elements requirement:

None Observed

Recommended corrective action:

None Observed

Objective evidence observed:

None Observed

Observation:

Description of observation:

None Observed

Local law or ETI/Additional elements requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

None Observed

Summary of sub-contracting – if applicable

☐ Not Applicable please x

A: Has the auditor made a simple

☐ Yes

calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> No Please describe: N/A
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , summarise details:
C: Number of sub-contractors/agents used:	N/A
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , summarise details: N/A
E: What checks are in place to ensure no child labour is being used and work is safe?	N/A

Summary of homeworking – if applicable			
<input 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 If Yes , summarise details: N/A		
B: Number of homeworkers	Male: N/A	Female: N/A	Total: N/A
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents N/A		If through agents, number of agents: N/A
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	N/A		
F: What processes are carried out by homeworkers?	N/A		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A		

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Grievance register, meeting minutes of workers participation committee are available for reviewing.
B: If Yes , are workers aware of these channels and have access? Please give details.	Grievance boxes are kept in every toilet in a secured place and all boxes are checked once in a month and workers' participation committee is arranged workers' meeting regularly. If any complain comes, it gets entry in the grievance register and verified by the concern officer and all these registers are available for reviewing.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	For some of the risks, actions were taken, such as training for machine operators, provide PPE, general awareness etc.
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 Please give Details: If the workers have any question or need help, they can through the suggestion box or talking direct to their manager.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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. help lines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details

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

☐ Yes

☒ No

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:

- According to the factory regulation, physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation were prohibited in the factory. According to worker interview, the factory treated every worker with respect and dignity, and no worker was subject to any physical, sexual, psychological or verbal harassment and abuse.

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

Details:

- Factory regulations, hiring procedures and anti-harassment training records were checked.
- Management interview and employee interview
- 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.

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

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:

None Observed

Recommended corrective action:

None Observed

Objective evidence observed:

None Observed

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

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:

- All employees are local. As per the provided labour contracts, all employees were hired directly by the facility, no contract labour was found in the facility.

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

Details:

- Labour contract.
- Personnel files.
- Hiring procedure.
- Worker handbook.

Any other comments: No comments.

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

Non-compliance:

1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements
☐ NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement:

None Observed

Recommended corrective action:

None Observed

Objective evidence observed:

None Observed

Observation:

Description of observation:

None Observed

Local law or ETI/Additional Elements requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

None Observed

10. Other issue areas 10B2: Environment 2-Pillar

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

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:

- The site have the environment management policy. They provided induction training for the related employees to keep safe the environment.

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

Details:

- Environmental policy
- Solid waste transfer documentation
- Environmental impact Assessment report
- Environment, Health and Safety policy

Any other comments: No comments

Note: The detail of findings (non-compliances, observations and good examples) could be found in Annex 1 of this report.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

None Observed

Local law and/or ETI/Additional Elements requirement:

None Observed

Recommended corrective action:

None Observed

Objective evidence observed:

None Observed

Observation:

Description of observation:

None Observed

Local law or ETI/additional elements requirement:

None Observed

Comments:

None Observed

Objective evidence observed:

None Observed

Good examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

None Observed

Other Findings Outside the Scope of the Code

None observed

Community Benefits

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

None observed

Annex 1

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7	New or Carried Over Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding	Details of Non-Compliance Details of Non-Compliance	Root cause (completed by the site)	Preventative and Corrective Actions Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)	Timescale (Immediate, 30, 60, 90, 180, 365)	Verification Method Desktop / Follow-Up [D/F]	Agreed by Management and Name of Responsible Person: Note if management agree to the non-compliance, and document name of responsible person	Verification on Evidence and Comments Details on corrective action evidence	Status Open/Closed or comment
1: 44	New – 0 - <u>Management systems and Site's Management system & Monitoring Major</u>	It was noted through Documents review and management interview that, facility has started to do internal audit in their facility against compliance requirements, But the audit report is not detailed or not with clear explanation with all minor / major elements or observations .., only categorise the issue is YES or NO which is not clear to understand the actual situation.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	Facility Management shall make internal audit report with detail / sufficient information . Management agreed to do this properly.	90	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/04/2019
2: 47	New – 0 - <u>Management systems and Sites Management</u>	It was noted through management and workers	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs	Facility Management shall provide employee	90	Desktop	Md. Shahab Uddin, Manager (Admin, HR	Upload relevant evidence on SEDEX platform	Open HA 26/04/2019

	<u>systems & Monitoring- Minor</u>	interview that, facility does not provides handbook to all of its employees.	<input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	handbook to all.			& Compliance)		
3: 81	New – 0 - <u>Management systems and Site's license & certifications - Major</u>	It was noted through Documents review, plant tour and management interview that, currently management using two (02) diesel generator without having the legal permission from concern authority. Also noted that, Group Insurance certificate, BKMEA & BBMEA membership certificate has been expired on December 31, 2018. However, management applied to concern authority for renewal and expecting to get these license & permission form concern authority of government.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	Facility Management shall obtained all legal license and permissions from concern authority and keep them up to date. Management agreed to arrange them shortly.	60	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/03/2019
4: 86	New – 0 - <u>Management systems and Site's systems to manage supplier compliance - Major</u>	It was noted through Documents review and management interview that, facility has the monitoring system to	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please	Facility Management shall do the proper monitoring system to all of their suppliers with detail observation	90	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/04/2019

		their own supplier against social standards but not for all of their listed suppliers and report also not in detail with mentioning the crucial elements whether they have or not.	give details: Lack of awareness.	report. Management agreed to do this properly.					
5: 220	New – 2- Freedom of Association and Collective Bargaining & Effectiveness of Representation Body – <u>Minor</u>	It was noted through documents review, management & workers interview that, participation committee has formed by the election process as well as meeting of this committee conducted and kept minutes of the meeting regularly but general workers are not well aware about this existing participation committee and don't know who are their representatives are.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	Facility Management shall provide training to all employees working in the facility about participation committee. Management agreed to do this.	90	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/04/2019
6: 354	New – 3 – Health, <u>Safety and Hygiene</u> & Fire Safety – <u>Licenses, Inspections & Training</u> – <u>Minor</u>	It was noted through interview with fire fighter's and plant tour that, they are not well aware/trained about their responsibility	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details:	Facility Management shall arrange proper training (from concern authority as well as internal) for all fire	90	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/04/2019

		in case of any fire incident and not well aware about operating the fire fighting equipment's .	Lack of awareness.	fighters. Management agreed to do this.					
7: 371	New – 3 – Health, Safety & hygiene & Chemical – <u>Major</u>	It was noted through plant tour that, no secondary containment found for machine oil drum kept in front of maintenance room and spot removing area where using thinner.	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	Facility Management shall provide secondary containment for all chemical using in the facility.	60	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/03/2019
8: 466	New – 3 – Health, <u>Safety and Hygiene</u> & <u>Worker health-Major</u>	It was noted through Plant tour that Plant tour and management interview that, there is a medical centre inside the facility but full time doctor / medical officer are not recruited here. Recruited/ existing medical officer coming or doing his duty 02 days in a week instead of 06 days.	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	Facility management shall arrange full time medical officer/ doctor inside the facility.	60	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/03/2019
9: 490	New – 3 – Health, Safety & Hygiene <u>and Hygiene Facilities & Housekeeping</u> – <u>Major</u>	It was noted through plant tour that, management does not provides any canteen facilities for the	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other – please	Facility Management shall arrange canteen facility for the employees. Management agreed	60	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/03/2019

		employees.	give details:	to do this as soon as possible.					
10: 613	New – 5 – (Record keeping and documentation), - <u>Critical</u>	It was noted through interview with management and workers that, facility management does not provides payment slip to employees.	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other – please give details: Lack of awareness.	Facility Management shall ensure that, all employees are getting the payment slip on each month.	30	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/02/2019
11: 816	New – 8 – Regular employment & Contract of Employment / Letter of appointment - Major	It was noted through documents review, management and workers interview that, Facility does not provides contract / appointment letter to the employees who are working since more than one month in the facility.	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other – please give details: Lack of awareness.	Facility Management shall ensure that, all employees are getting contract/ appointment letter and Identity card during recruitment and as soonest time.	60	Desktop	Md. Shahab Uddin, Manager (Admin, HR & Compliance)	Upload relevant evidence on SEDEX platform	Open HA 26/03/2019

Corrective Action Plan – Observations

Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>

Good examples

Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
1. 5.648 (Wages and Benefits & Insurance), Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	It was noted that, facility provides attendance bonus to workers.	Document review, management and worker interview

Appendix 1

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

☐ Not Applicable please x

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

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

and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.	
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
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.	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.	
ETI 1. Forced Labour	ETI 1. Forced Labour
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.	

ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
<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>	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<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 & 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 & Safety to a senior management representative.</p>	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<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</p>	

the provisions of the relevant ILO Standards.	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
<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>	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
<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 all of the following are met:</p> <ul style="list-style-type: none"> – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' 	

<p>organisation representing a significant portion of the workforce;</p> <ul style="list-style-type: none"> – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
<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>	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment</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>	

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
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.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
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	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
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.	
10. Other issue areas 10B2: Environment 2-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. <i>Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.</i>	

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses	

<p>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>B4. Guidance for Observations</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>	
<p>Business Practices Section</p>	
<p>10C. Compliance Requirements</p> <p>10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.</p> <p>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.</p> <p>10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.</p> <p>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.</p> <p>10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of</p>	

<p>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.</p> <p>10C. Guidance for Observations</p> <p>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.</p>	
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Photo Form

Non-compliance photos

NC Photo 01: Generator without having the permission	NC Photo 02: Machine oil drum without secondary containment	NC Photo 03: Thinner drum without secondary containment

General photos

Main entrance of the site	Site / building overview	Name board of the site

ETI Base Code posted in the site	Evacuation plan	Stair case

Sample section	Cutting section	Sewing section
Ironing section	Finishing section	Packing section
Fire alarm switch	Fire alarm with visual signal	Exit light
Water hose reel for fire	Suggestion / complain box	Open space in roof top



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

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

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

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

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