



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1051877	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1054940
Business name (Company name):	Metro Knitting & Dyeing Mills Ltd		
Site name:	Metro Knitting & Dyeing Mills Ltd		
Site address:	Ramabag Kutubpur Fatullah Narayangonj Narayangonj 1400 BD	Country:	BD
Site contact and job title:	Mr. Gaur Nitai Datta / A.G.M (Admin, HR & Compliance)		
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-03-20		

Audit Company Name:
SGS Bangladesh

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Taslima Rahman Tafsir	APSCA Number:	21703754
Additional Auditors:	Fatema Tuj Johora Aniruddha Paul		
Date of declaration:	2023-03-21		

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

Site Representation	
Full Name:	Mr. Gaur Nitai Datta
Title:	A.G.M (Admin, HR & Compliance)
Date of declaration:	2023-03-21
Comments:	NA

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §10 §11 §2 §3 §4 §5 §6 §7 §8 §9	12	0	0	NC - ZAF600037126 NC - ZAF600037127 NC - ZAF600037128 NC - ZAF600037129 NC - ZAF600037130 NC - ZAF600037131 NC - ZAF600037132 NC - ZAF600037133 NC - ZAF600037134 NC - ZAF600037135 NC - ZAF600037137 NC - ZAF600037138
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	3	GE - ZAF600037123 GE - ZAF600037124 GE - ZAF600037125
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>	10.B4.1	§12	1	0	0	NC - ZAF600037136
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
§1	Bangladesh Energy Regulatory Commission Act, 2003, Section 27(1): (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 Act, such as: (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.
§2	Boiler Act 2022, Section 18 (4): (4) The validity of the certificate of use of the boiler shall be not less than 1 (one) year and shall be renewable.

§3	Bangladesh Labour Rules, 2015 Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipments, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.
§4	Bangladesh Labour Rules 2015, Schedule 4(2), B (1): Following matters shall be included in the guideline prepared under clause (a), Namely. 1. Risk and safety related management of the firm: (a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc) (b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc) (c) Risk level (like high/medium/general/not satisfactory) (d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure) (e) Assessment of necessary protection system in different nature and levels of risk; and (f) Assessment of technical and administrative liability.
§5	Bangladesh Labor Rules- 2015, Rule-78-a (i) & b 1) As per the regulations of Section 89(6), if minimum 5000 workers and employees work in the institute/s that is/are owned by the same Owner: a) The Owner of the institute shall establish a Health Centre. Following number of medical staff must be in the Health Centre in order to provide treatment facilities to workers/employees: i) At least 2 registered Physicians for 5000 to 7500 workers-employees; b) As per Section 77, there is no need for separate medical room. However, minimum 6 beds must be in each Health Centre.
§6	Bangladesh Labour Rules, 2015, Rules: 68(10): The owner shall place Material Safety Data Sheet (MSDS) of dangerous materials in an easily noticeable place so that the employed worker can be well informed about the possible hazards.
§7	Bangladesh Labour Law 2006, Section 63 (1) D (iii): Fencing of machinery. – (1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced- (iii) every dangerous part of any machinery: Provided that for the purpose of determining whether any part of machinery is safe as aforesaid, any occasion of examination or operation made or carried out in accordance.
§8	Bangladesh Labour Law 2006 Section 72 (c) and Bangladesh Labour (Amendment) Act 2013): passages and stairways shall be clean, wide and clear of all obstructions. Bangladesh Labour Law 2006, Section- 62 (4): (4) In every establishment, except the exit for ordinary use, every window, door or other exit affording means of escape in case of fire shall be distinctively marked in Bangla letters by red colour or marked by other clearly understood sign
§9	Bangladesh Petroleum Act 2016, chapter 2, section 6. No License needed for certain situation. -Notwithstanding anything contained in this chapter, no license is needed for the following cases, namely-(a) for the transport or storage of class II and class III petroleum not exceeding 2000 (two thousand) liters.
§10	Building Construction Act 1952, Section-3(1): Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alternation to any building, or excavate or re-excavate any tank within the area to which this Act applies;
§11	Bangladesh Labor Rules-2015, Rule 353(1 & 4): 1) Before use, change or expansion of any houses, building or premises as factory, approval in writing of the inspector general or any officer empowered by him shall be taken. Provided, however, that the inspector general or any officer empowered by him shall not sanction any approval without any inspection on the spot. (4) Without written permission of the inspector general, no change in any approved layout plan may be brought.

§12	Bangladesh Labour Law 2006, Section 54: Every establishment shall take effective measures to remove any wastage created due to the production process.
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## Site Details

Site Details		
Company Name	Metro Knitting & Dyeing Mills Ltd	
Site Name	Metro Knitting & Dyeing Mills Ltd	
GPS location (if available)	GPS Address:	Nil.
	Coordinates:	23.6454481 and 90.4860392
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Trade License serial No: 03, issue date 02.07.2019 issued by Kutubpur Union Parishad, Narayanganj Which is valid till 30th June 2023. Factory Licence No: 11236/Narayanganj, category is 'L' issued by Chief Inspector of Factories and was valid till 30 June 2023. Fire Licence No: DD/Dhaka/17396/2003 issued by Bangladesh Fire Service & Civil Defence Authority which is valid till 30th June 2023.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kinds of Dyeing, Printing and Knit Items	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Metro Knitting &amp; Dyeing Ltd. is located at Kamarbag, Kutubpur, Fatullah, Narayanganj, Bangladesh. There is another factory named 'Bea-con Knitwear Limited' located in the factory premises under same management and same owner. The factory has started its operation from 2000 as per incorporation certificate and production started from 2000. Total land area is about 389320 square feet, production floor is about 568215 square feet &amp; warehouse is about 372410 square feet. Currently 5390 employees are working in the factory including management Staff. Among them 3234 are male and 2156 are female. Among 5390 employees 3373 are production and 2017 are non-production. All workers are Bangladeshi by born. In general, the employees work for 6 days in a week (Thursday to Tuesday) and Wednesday is weekly holiday. Factory's general working hour started from 8:00 am to 5:00 pm including 1-hour lunch break from 1.00 pm to 2.00 pm. Facility has also three shifts for knitting and dyeing from 6.00 am to 2.00 pm, 2.00 pm to 10.00 pm &amp; 10.00 pm to 6.00 am including 1-hour lunch break by rotation and two shifts for printing and washing from 8:00 am to 5:00 pm and 8:00 pm to 5:00 am including 1 hour lunch break. Facility is paying monthly salary by bank (Rocket). Metro Knitting &amp; Dyeing Ltd. sharing their building with Bea-con Knitwear Limited with same management but under different licenses. The facility premise consists of total 14 buildings and 05 sheds.</p>	



Structure and number of buildings	Building Name:		Building-1 (07 storied)
	Floor	Description	Remark
	Ground Floor	Warehouse (dyes chemical), dyeing finishing, office & batch section, sample & embroidery	Used by audited factory
	1st floor	Corporate office.	Combinedly used with Bea-con Knitwear Ltd.
	2nd floor	Corporate office.	Combinedly used with Bea-con Knitwear Ltd.
	3rd floor	Proposed Corporate office, temporary finished goods	Used by audited factory
	4th floor	Idle machine, finishing section, maintenance room, spot removing room	Used by audited factory
	5th floor	Cutting section, Office & 4% open space	Combinedly used with Bea-con Knitwear Ltd.
	6th floor	Store, dining, and prayer room	Combinedly used with Bea-con Knitwear Ltd.
	Roof top	100% vacant	NA

Building Name:		Building-2 (07 storied)	
Floor	Description	Remark	
Ground Floor	Fabric warehouse and fire control room	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	Open, prayer room and finished goods.	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	Finished goods store	Combinedly used with Bea-con Knitwear Ltd.	
3rd floor	Finishing and Packing section	Used by audited factory	
4th floor	Spot removing room, Finishing, and packing section	Used by audited factory	
5th floor	Sewing section, quality	Used by audited factory	
6th floor	Sewing section, quality	Used by audited factory	
Roof top	Prayer room, trimming section maintenance, 70 % open space.	Combinedly used with Bea-con Knitwear Ltd.	
Building Name:		Building-3 (07 storied)	
Floor	Description	Remark	
Ground floor	Chemical store, chemical mixing area	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	Accessories store, office	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	Sample section (sewing)	Used by audited factory	
3rd floor	Sample section (CAD) & Office	Used by audited factory	
4th floor	Sample section (Cutting & Finishing), office	Used by audited factory	
5th floor	Fabric store	Combinedly used with Bea-con Knitwear Ltd.	
6th floor	Fabric store	Combinedly used with Bea-con Knitwear Ltd.	
Roof top	100% vacant.	NA	

Building Name:		Building-4 (08 storied)	
Floor	Description	Remark	
Ground Floor	Dyeing section (Bea-con Knitwear Ltd.)	Used by Bea-con Knitwear Ltd.	
1st floor	Warehouse (Chemicals), Lab, & compressor	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	R&D, dining, canteen & prayer room and fabric store.	Combinedly used with Bea-con Knitwear Ltd.	
3rd floor	Accessories store	Combinedly used with Bea-con Knitwear Ltd.	
4th floor	Cutting section	Used by audited facility	
5th floor	Sewing (no production running) & finishing section (Iron, Qi, Hand tag)	Used by audited facility	
6th floor	Sewing & finishing section (Iron, Qi, Hand tag)	Used by audited facility	
7th floor	Sewing & finishing section (Iron, Qi, Hand tag)	Used by audited facility	
Roof top	100% vacant	NA	
Building Name:		Building-5 (06 storied)	
Floor	Description	Remark	
Ground floor	Dyeing finishing, Equalization tank-1 of ETP	Used by audited facility	
1st floor	Grey batch store area	Used by audited facility	
2nd floor	Grey batch store area	Used by audited facility	
3rd floor	Grey batch store area	Used by audited facility	
4th floor	Knitting section	Used by Bea-con Knitwear Ltd.	
5th floor	Knitting section	Used by audited facility	
Roof top	100% vacant	NA	

Building Name:		Building-6 (08 storied)-Adjoint building	
Floor	Description	Remark	
Ground floor	Sample dyeing	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	Grey & batch store	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	Grey & batch store	Combinedly used with Bea-con Knitwear Ltd.	
3rd floor	Grey & batch store	Combinedly used with Bea-con Knitwear Ltd.	
4th floor	R&D office and store	Combinedly used with Bea-con Knitwear Ltd.	
5th floor	Knitting section	Used by audited facility	
6th floor	Knitting section	Used by audited facility	
7th floor	Narrow fabric & collar (audited facility) & sample jacquard section (Used by Bea-con Knitwear Ltd.)	Combinedly used with Bea-con Knitwear Ltd.	
Roof top	100% vacant	NA	

Building Name:		Building-7 (10 storied)	
Floor	Description	Remark	
Basement	Spare part storage area, Fire water pump	NA	
Ground Floor	Printing finishing (continuous washing, stenter, compacting)	NA	
Mezzanine floor 1	Chemical sub-store	NA	
1st floor	Rotary printing	NA	
Mezzanine floor 2	Office	NA	
2nd floor	All over print, Digital printing	NA	
3rd floor	Printing, printing fabric, printing screen, grey store	NA	
4th floor	Chemical store	NA	
5th floor	Yarn store	NA	
6th floor	Knitting section	NA	
7th floor	Yarn store	NA	
8th floor	Yarn store, partial leftover store	NA	
9th floor	Yarn store	NA	
Roof top	100% vacant	NA	
Building Name:		Building-8 (05 storied)	
Floor	Description	Remark	
Ground floor	Admin office, MIS and medical room, security, RMS	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	Training, conference room, childcare, ansar rest, guest room, prayer room	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	Guest room, civil office, SDC, security room	Combinedly used with Bea-con Knitwear Ltd.	
3rd floor	Mandir, dining	Combinedly used with Bea-con Knitwear Ltd.	
4th floor	Security dining	Combinedly used with Bea-con Knitwear Ltd.	
Roof top	100% vacant	NA	

Building Name:		Building-9 (06 storied)	
Floor	Description	Remark	
Ground Floor	Workshop, fabric store, WTP store	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	Yarn store and office	Used by audited facility	
2nd floor	Knitting section	Used by Bea-con Knitwear Ltd.	
3rd floor	Knitting section	Used by Bea-con Knitwear Ltd.	
4th floor	Yarn store	Used by audited facility	
5th floor	Yarn store	Used by audited facility	
Roof top	Gym and guest house (30% open)	Used by audited facility	
Building Name:		Building-10 (08 storied)	
Floor	Description	Remark	
Ground floor	Dyeing	Used by audited facility	
Mezzanine floor	Office	Used by audited facility	
1st floor	Dyeing finishing	Used by audited facility	
2nd floor	Dyeing finishing	Used by audited facility	
3rd floor	Finished goods store, Idle machine area, dining and prayer room	Combinedly used with Bea-con Knitwear Ltd.	
4th floor	Sewing section, Iron, folding, packing & finishing & finishing	Used by audited facility	
5th floor	Sewing section, Iron, folding, packing & finishing	Used by audited facility	
6th floor	Cutting	Used by Bea-con Knitwear Ltd.	
7th floor	Finished fabric store	Used by Bea-con Knitwear Ltd.	
Roof top	100% vacant	NA	

Building Name:		Building-11 (03 storied)	
Floor	Description	Remark	
Ground Floor	Generator, sub-station, transformer	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	Boiler	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	Compressor	Combinedly used with Bea-con Knitwear Ltd.	
Roof top	100% vacant	NA	
Building Name:		Building-12 (04 storied)	
Floor	Description	Remark	
Ground Floor	Feed pump colling tower	Combinedly used with Bea-con Knitwear Ltd.	
1st floor	ETP lab and MC panel area	Combinedly used with Bea-con Knitwear Ltd.	
2nd floor	Wastage fabric store	Combinedly used with Bea-con Knitwear Ltd.	
3rd floor	Finished fabric store	Combinedly used with Bea-con Knitwear Ltd.	
Roof top	100% vacant	NA	

<b>Building Name:</b>		Building-13 (07 storied)	
<b>Floor</b>	<b>Description</b>	<b>Remark</b>	
Ground Floor	Washing section	Used by audited facility	
1st floor	Dryer and washing quality section Dryer and washing quality section	Used by audited facility	
2nd floor	Washing and Dryer section	Used by audited facility	
3rd floor	Grey fabric store	Combinedly used with Bea-con Knitwear Ltd.	
4th floor	Yarn and chemical store	Combinedly used with Bea-con Knitwear Ltd.	
5th floor	Grey and finished fabric store	Combinedly used with Bea-con Knitwear Ltd.	
6th floor	Store	Combinedly used with Bea-con Knitwear Ltd.	
Roof top	100% vacant	NA	
<b>Building Name:</b>		Building-14 (05 storied)	
<b>Floor</b>	<b>Description</b>	<b>Remark</b>	
Ground Floor	Under construction	NA	
1st floor	Under construction	NA	
2nd floor	Under construction	NA	
3rd floor	Under construction	NA	
4th floor	Under construction	NA	
Roof top	100% vacant	NA	
<b>Building Name:</b>		Shed 1	
<b>Floor</b>	<b>Description</b>	<b>Remark</b>	
Ground floor	Dyeing section	NA	
<b>Building Name:</b>		Shed 2	
<b>Floor</b>	<b>Description</b>	<b>Remark</b>	
Ground floor	Yarn store	NA	
<b>Building Name:</b>		Shed 3	
<b>Floor</b>	<b>Description</b>	<b>Remark</b>	
Ground floor	Waste keeping area.	NA	
<b>Building Name:</b>		Shed 4	
<b>Floor</b>	<b>Description</b>	<b>Remark</b>	
Ground floor	Dyeing	Shared with Bea-con Knitwear Ltd.	



	Building Name:		Shed 5	
	Floor	Description	Remark	
	Ground floor	Narrow fabric, Leftover yarn store	NA	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported as a result of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual checks.			
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building construction plan was taken from LGED, Narayanganj on 12.08.11 and Kutubpur Union Parishod, narayanganj on 24.05.2007. Floor layout permission was taken from Deputy Chief Inspector on 28.06.2022.			
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor			
Months of peak season				
Process overview	Product: Knit Garments, knitting, Dyeing, washing and Printing of Knit items. Process: Knitting, Dyeing, All Over Printing, Cutting, Sewing, Washing, Finishing, Packing. Major Equipment: Total machine = 1127: Equipment: plain machine,overlock machine ,cylinder bed machine,smak cylinder bed machine,flatbed machine,body hem compressor,back tape machine,rib cutter machine,dar tack machine,button hole machine,cutting machine (safq),button stitch machine,cutting machine ,pickoting machine (kansa), fusing machine,two needle machine,zigzag stitch machine,spot cleaner,angular stitch machine,pmd machine,saub button,thread sucker machine,needle detector, washing m/c , spot cleaner,iron table with iron, automatic flatbed all over printing m/c, automatic flat bed screen printing m/c, manual screen print, automatic inject m/c, developer m/c, stretching m/c, manual exposing m/c, rib & inter lock ,single jersey ,dyeing machine ,tubular finishing machine, gas dryer (santex) ,tubular finishing machine,, steam dryer, turning machine, tubular compactor, tubular squeezer, soft calendar machine, dyeing machine ,washing machine ,hydro extractor machine ,tumble dryer machine, lab-dyeing machine, boiler, generator, compressor. wtp, etp.			
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None			

Please give details:	Participation Committee, Name of the Participation Committee representative: Mr. Razzak
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA. Factory does not provide any living accommodation for the workers as all workers live in nearby areas and there is no legal requirement as well.

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	08:10	In	08:30
	Out	17:30	Out	15:30
Audit type:	FULL_INITIAL			
Was the audit announced?	SEMI_ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Mr. Gaur Nitai Datta / A.G.M (Admin, HR & Compliance)			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	Not applicable. In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers' representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).		
<i>Reason for absence during the audit</i>	Not applicable. In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers' representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).		
<i>Reason for absence at the closing meeting</i>	Not applicable. In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. For an establishment where there is no trade union, until a trade union is formed, the workers' representatives to the Participation Committee shall run activities related to workers' interests in the establishment concerned and worker's representative should be elected by direct vote of workers (amendment 22nd of July 2013, Labour Law 2006).		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	3234	0	0	0	0	0	0	3234
Worker numbers – female	2156	0	0	0	0	0	0	2156
Total	5390	0	0	0	0	0	0	5390
Number of Workers interviewed – male	49	0	0	0	0	0	0	49
Number of Workers interviewed – female	37	0	0	0	0	0	0	37
Total – interviewed sample size	86	0	0	0	0	0	0	86

Nationalities Structure	
Nationality of Management	Bangladeshi
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Bangladeshi approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any peak season, production volume round the year is same.
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: None

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	50 employees (10 groups of 5 employees, no. of male -35 & female- 15)
Number of individual interviews:	Male: 14 Female: 22
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No issue was identified during worker interview.
What did the workers like the most about working at this site?	On time payment, no discrimination, aware of legal right.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	Comfortable
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Attitude of workers:</p> <p>Total 86 employees including 49 male and 37 female were selected for interview. Among them 36 employees were selected for individual interview and total 50 employees in 10 groups (5 employees in each group) were selected for the group interview. All the interviewees were favourable with the management. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They are able to complain directly to their supervisors or line manager and also felt free to give their general concerns to their Participation Committee representative who would take it to the Participation Committee meeting.</p>
<p>Attitude of worker's committee/union reps:</p> <p>Participation Committee members were comfortable with management, workplace and interview process. During opening meeting PC member was present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. They replied naturally regarding their responsibilities as Participation Committee member and they also informed that they can easily carryout their daily job without any difficulties. Participation Committee meetings are held on regular basis. Last meeting of participation committee was held on 27th February 2023. They also stated that they could give suggestions on all parts of the site's practices.</p>
<p>Attitude of managers:</p> <p>Management of the factory was positive and supportive during the whole audit. Mr. Gaur Nitai Datta- AGM (HR, Admin &amp; Compliance) was the key person of the facility. He is responsible for compliance with the Code, legal requirements, development of policies and its implementation, monitoring &amp; control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope, e.g. ETI Base Code, local laws etc. The factory management was found to be cooperative throughout the audit.</p>



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

**0A: Compliance Requirements**

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
- 0.A.3 Businesses shall identify their stakeholders and salient issues.
- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1. Facility implements and maintains systems for delivering compliance to this Code.
- 2. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

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

**Any other comments:**

Nil

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Factory has policy which authorized at the highest-level human rights impacts and issues, and ensure it is communicated to all workers.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Policies are included in the workers' handbook.
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: Mr. Gaur Nitai Datta, Job title: AGM (HR, Admin & Compliance)

<p>Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.</p>				
<p>Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>				
<p>Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All employee information and personnel files are kept locked away in the human resources department and it is only viewed by the HR department.</p>				
<p><b>Measuring Workplace Impact</b></p>					
<p>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))</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">2%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">2%</td> </tr> </table>	Last year	2%	This year	2%
Last year	2%				
This year	2%				
<p>Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])</p>	<p>2%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">1%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">1%</td> </tr> </table>	Last year	1%	This year	1%
Last year	1%				
This year	1%				
<p>Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)</p>	<p>1%</p>				
<p>Are accidents recorded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility management has maintained a Injury register where they recorded accident.</p>				
<p>Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)</p>	<table border="0"> <tr> <td>Last year</td> <td style="text-align: right;">1%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">0%</td> </tr> </table>	Last year	1%	This year	0%
Last year	1%				
This year	0%				

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0%	
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%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0%
	12 month	0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0%
	12 month	0%

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

**0B: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

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

**Evidence examined:**

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

**Any other comments:**

Nil

**Management Systems**

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  Site has not been subjected to any fines in the last 12 months.
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:  Here is effective policy and procedures found to reduce the risk of forced labor, child labor, discrimination, harassment & abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	There is effective policy and procedures found to reduce the risk of forced labor, child labor, discrimination, harassment & abuse.
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:  Managers and workers have received training on the standards for forced labor, child labor, discrimination, harassment & abuse. Last mid-level management training was held on 18th February 2023 with 30 participants and last training for workers was held on 1st to 11th February 2023 with 31 participants.

<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment &amp; abuse and factory preserved training records as evidence. During interview workers were found aware about the policies and procedures.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Facility has an independent Human Resources Department and Mr. Gaur Nitai Datta- AGM (HR, Admin &amp; Compliance) is responsible for this department.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a senior person and Mr. Gaur Nitai Datta- AGM (HR, Admin &amp; Compliance) is put into action of the Code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory has the policy to ensure all worker information confidential though notice board and awareness training.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>There is effective policy and procedures found to ensure confidential information is kept confidential.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure. Last risk assessment was conducted on 5th January 2023.</p>
<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Risk assessment was conducted by factory to evaluate effectiveness of policy and procedure. Last risk assessment training for the employees was held on 21 January 2023 with 33 participants.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility management communicates this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>
<p><b>Land Rights</b></p>	

<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility is situated in its own land. Documents of land rights are available in the facility.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>NA</p>

**1 - Freely chosen Employment**  
**[Summary of Findings]**

1: Compliance Requirements  
 1.1 There is no forced, bonded or involuntary prison labour.  
 1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. Facility does not hold main copy of any legal document of the workers during recruitment. The factory maintains only copies of all hiring documents such application, date of birth certificates, school certificates etc.
2. The workers are free to leave the workplace if workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.
3. Facility displayed overtime policy stating that over time work is voluntary.
4. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

1. Facility Management Interview
2. Document review (Recruitment policy, working hour policy, workers’ personal file, copy of national ID, date of birth certificates, school certificates, security guard’s job description etc.)
3. Workers Interview

**Any other comments:**

Nil

Is there any evidence of retention of original documents, e.g. passports/ID’ (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers’ freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a ‘modern day slavery statement?’	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: Not applicable
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 give details: Not applicable

<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Facility has policy &amp; procedure on force labour, bonded labour and they understand the risk also communicate with their supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a policy against forced/trafficked labour which maintained by the facility. No forced, trafficked and bonded evidence found during audit.</p>



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

**2: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1. All the employees are allowed to participate and elect the committee members of their choice.
- 2. There is no trade union in the facility and it is not mandated by law.
- 3. There is Participation Committee (PC) as parallel means for trade union. Last election was held on 18th October 2022. All documents has been varied during audit and found actual.
- 4. Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as worker's representatives also.
- 5. Participation Committee members are allowed to carry out their duties within working hours without affecting their pay.
- 6. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

- 1. Facility management interview.
- 2. Worker interview.
- 3. Complaint box register (Suggestions from the complaint box and actions taken).
- 4. Participation Committee formation record review and PC meeting records review.
- 5. Grievance handling policy & procedure

**Any other comments:**

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Participation Committee (PC)	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has formed safety committee. (Workers 06 & management 06) total 12.	
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory provides adequate facilities to conduct the regular meeting. Participation committee (PC) meetings are held on a regular basis. The last PC meeting was held on 27.02.2023. PC meeting minutes recorded, and action taken.
Name of union and union representative, if applicable:	NA
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation committee (PC) was formed by election.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All workers were aware of who are their representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-10-18
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The participation committee is effective because they conduct meeting periodically. Last meeting was conducted on 27.02.2023. PC meeting minutes are recorded and action is taken. Besides, the meeting minutes are communicated with the employees through notice board. Last meeting minutes agenda as below: Worker agenda: 1. Discussion on lunch box keeping area. 2. Discussion on reduce wastage. 3. Discussion on song play on PA system. 4. Discussion on use of PPE.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

**3: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. Factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.
2. Exit signs were found illuminated and emergency lights were installed with IPS back up.
3. Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box – 72 & first aider were – 153 persons.
4. Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 06.02.23 with 31 persons.
5. Firefighting training provided as per law. Last firefighting training provided on 13.03.2023 with 40 persons.
6. First aid, PPE training provides regularly. Last first aid and PPE training provided on 17-19.02.2023 & 13.02.2023 with 151 persons & 33 persons respectively.
7. Medical and childcare facility available in the factory.
8. Workers' toilet segregated for male and female, adequate number as per law, wash facility provided. Total no. of male toilets – 70 and female toilets – 50.
9. The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed. All switches in the electrical control panels have been labeled.
10. Factory has regular fire equipment maintenance system. Facility has provided one dining rooms in the facility for the workers. Total seating capacity is 750 (per shift).
11. Facility has conducted last fire drill on 18.03.2023, Persons – 4195.
12. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

1. Plant tour.
2. Document review (Training record review, daily machine maintenance register, electrical installation checking register, injury register, fire drill register, fire equipment's checking register).
3. Facility management interview.
4. Worker interview.

**Any other comments:**

Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

Yes  No

Please give details:

There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.

<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Policies are included in the workers' handbook.</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility management has taken construction approval from local Chairman Kutubpur Union Porishad, Fatullah, Narayanganj instead of concern authority for building#1,2,3,4,5,8,9 and shed:1 to 6. In addition, facility didn't take approval for 4th floor &amp; roof top of building 8 from concern authority.</p>
<p>Are visitors to the site informed on H&amp;S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Visitors are informed on H &amp; S and provided PPE when required.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Medical Facility is available for the workers. However, total 02 factories located in the same factory complex under same management and same owner with total manpower of 7262 workers where 5390 workers in the audited factory and around 1872 in the other factory (Be-con Knitwear Ltd.). Medical center is used combine by both factories. As per current manpower of both factories, health center is required but facility did not have health center as per law. Moreover, 3 beds found instead of 06 in the medical center of the facility.</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has medical facility available with two full-time Doctors, Dr. Farjana Yeasmin and Dr. AKKH Samins Sadi, one Nurse - Ms. Ruma Akter and one medical assistant - Amir Hossain. Enough first aid kits stocked and provided in production floor. Total no. of first aid box – 72 &amp; first aiders were 153 persons.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No transport facility has been provided for the workers and it is not required by law.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not applicable. Dormitory facility is not provided to the workers, and it is not required by law.</p>
<p>Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility conducts risk assessment on regular basis. Last risk assessment was conducted on 05.01.2023 and different initiatives are taken to control the risks.</p>






<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility meets legal obligation of disposing natural resource.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility does not use any banned chemical.</p>




Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037126	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Govt. delay procedure	
Local law issue	Bangladesh Energy Regulatory Commission Act, 2003, Section 27(1): (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 Act, such as: (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the plant tour, document review and management interview it was noted that, facility did not take Captive power plant license for their use of these power generators though facility is at present using 5 generators (3 gas generators and 02 Diesel generator) having total power generation capacity of 6.9486 MW (2000 KW + 2000 KW + 2000 KW + 900 KW+ 48.60 KW). However, facility has applied for obtaining the generator license only for 6.0486 MW of power generation instead of 6.9486 on 04 April 2022 & 27 May 2021 to the concern authority, but not received the license.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> <input type="checkbox"/>	






	365 days	Other	
Actions	It is recommended that factory should collect generator license from concern authority for using power generator.		

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037127	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Boiler Act 2022, Section 18 (4): (4) The validity of the certificate of use of the boiler shall be not less than 1 (one) year and shall be renewable.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted through document review and management interview 01 out of 03 certificate of boiler operation (BA. BO 2237) has been expired from 11 March 2023. However, facility has applied for renewal on 14 February 2023 to the concern authority but not received yet.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory management should obtain the updated boiler certificate from concern authority.	




Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037128	<u>Spot removing operator not wearing hand gloves, goggles and respiratory mask.JPG</u>
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	<u>Snap button machine operator not using eye goggles.JPG</u>
Root cause - Other	Lack of awareness	
Local law issue	Bangladesh Labour Rules, 2015 Rule 67 (2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipments, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	<u>Overlock machine operator not using facemask.JPG.JPG</u>
Explanation to the non compliance	Based on the plant tour following issues noted below: 1. 10% dyeing section operators were not using respiratory mask, eye goggles & hand gloves at shed 1 & ground floor of building 4. 2. 01 out of 01 maintenance workers found without welding shield and hand gloves while doing welding job at the maintenance room of ground floor of building 9. 3. 9% knitting section & narrow fabric area employees were not using ear plug at knitting section of 5th floor of building 5 & shed 1 during work. 4. 15% cutting & flatlock, overlock machine operators were not using facemask in cutting, sewing & sample section during work located at 5th floor of building 1, 5th to 6th floor of building 2 & 2nd floor of building 3. 5. 01 out 01 snap button machine operator was not using eye goggle in sample section during work located at 2nd floor of building 3. 6. 02 out 04 spot removing operators were not using respiratory	
		<u>Maintenance workers found without welding shield and hand gloves.JPG</u>
		
		<u>Knitting Section worker not</u>




	mask, eye goggles & hand gloves 4th floor of building 2.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	<u>using ear plug.JPG</u>
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	 <u>Flatlock machine operator not using facemask.JPG</u>
Actions	It is recommended that factory management should ensure the use of PPE with the awareness program for the workers in the required sections.	 <u>Dyeing section operator not using respiratory mask, eye goggles &amp; hand gloves .JPG</u>
		 <u>Cutting Section worker not using facemask.JPG</u>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037129	<u>Uneven floor at dyeing section.JPG</u>
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	152 - Health and safety risk assessment conducted, but not suitable / sufficient and/or documented	
Subcategory	Health & Safety Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/> System <input type="checkbox"/> Lack of workers	<u>Excessive Height was observed at yarn store.JPG</u>
Root cause - Other	Lac of awareness	
Local law issue	Bangladesh Labour Rules 2015, Schedule 4(2), B (1): Following matters shall be included in the guideline prepared under clause (a), Namely. 1. Risk and safety related management of the firm: (a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc) (b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc) (c) Risk level (like high/medium/general/not satisfactory) (d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure) (e) Assessment of necessary protection system in different nature and levels of risk; and (f) Assessment of technical and administrative liability.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the plant tour, document review and management interview it was noted that facility didn't identify specific hazard/risk for some area though they conducted the risk assessment periodically. Observations were like: a. 03 out 03 compressors were without fencing located at 1st floor of building 4. b. Few floor areas of dyeing section were uneven and rough located at ground floor of building 12 which may cause of injury in case of emergency evacuation. c. Excessive height were observed at chemical store, yarn store in ground floor of building 3, at 5th, 7th to 9th floor of building 7 & Shed 2 which may cause falling injury of the workers.	
		<u>Compressor without fencing 1.JPG</u>

Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should assess risk assessment properly with identify specific hazard to eliminate the risk.	





Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037130	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	289 - First aid box available but contents are missing / contents out of date or otherwise inadequate	
Subcategory	First Aid / Accidents	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labor Rules- 2015, Rule-78-a (i) & b 1) As per the regulations of Section 89(6), if minimum 5000 workers and employees work in the institute/s that is/are owned by the same Owner: a) The Owner of the institute shall establish a Health Centre. Following number of medical staff must be in the Health Centre in order to provide treatment facilities to workers/employees: i) At least 2 registered Physicians for 5000 to 7500 workers-employees; b) As per Section 77, there is no need for separate medical room. However, minimum 6 beds must be in each Health Centre.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the plant tour it was noted that, total 02 factories located in the same factory complex under same management and same owner with total manpower of 7262 workers where 5390 workers in the audited factory and around 1872 in the other factory (Be-con Knitwear Ltd.). Medical centre is used combine by both factories. As per current manpower of both factories, health centre is required but facility did not have health centre as per law. Moreover, 3 beds found instead of 06 in the medical centre of the facility.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days	
		 <p><u>Insufficient Bed in medical room .JPG</u></p>

	<input type="checkbox"/> 90 days <input checked="" type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility management should ensure health centre as per law.	






Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037131	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	230 - No material safety data sheet (MSDS) obtained / available	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labour Rules, 2015, Rules: 68(10): The owner shall place Material Safety Data Sheet (MSDS) of dangerous materials in an easily noticeable place so that the employed worker can be well informed about the possible hazards.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the plant tour it was noted that, 09 out of 09 machine oil drums were found without secondary containment, labelling and MSDS located beside the shed 3. Moreover, 60 out of 90 chemical drums and printing colours were kept without MSDS, labelling and secondary containment in chemical store located at 4th floor of building 2 &13.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that factory management should ensure MSDS, secondary containment and labelling for all chemical drums, machine oil etc, where required.	
		 <p><u>No MSDS, labelling and secondary containments printing color .JPG</u></p>  <p><u>No MSDS, labelling and secondary containments machine oil .JPG</u></p>  <p><u>No MSDS, labelling and secondary containments Chemicals.JPG</u></p>





Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037132	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labour Law 2006, Section 63 (1) D (iii): Fencing of machinery. – (1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced- (iii) every dangerous part of any machinery: Provided that for the purpose of determining whether any part of machinery is safe as aforesaid, any occasion of examination or operation made or carried out in accordance.	 <p><u>Rubber mat missing for under snap button machine.JPG</u></p>
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	 <p><u>Plain machine needle guard displaced .JPG</u></p>
Explanation to the non compliance	Based on plant tour following machine safety related issue noted below: a. Approximate 10 % of needle guards of sewing machine were displaced condition at sewing section & sample section in 5th floor of building 2, 2nd floor of building 3 & 4th to 5th floor of building 10. b. Approximate 10% eye guards of overlock machines & flatlock machines were displaced condition at sewing section & sample section in 5th floor of building 2, 2nd floor of building 3 & 4th to 5th floor of building 10. c. 02 out 02 rubber mats were missing for snap button machines in sample section during work located at 2nd floor of building 3.	 <p><u>Overlock machine eye guard displaced .JPG</u></p>
Follow up	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	 <p><u>Flatlock machine eye guard displaced .JPG.JPG</u></p>

method		
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should provide effective training to the employees on proper use of machine safety guard.	

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037133	<u>Aisles partially faded at narrow fabric area.JPG</u>
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	215 - Evacuation plan not adequately communicated to workers	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	<u>Aisles partially faded at dyeing section and blocked by trolley.JPG</u>
Root cause - Other		
Local law issue	Bangladesh Labour Law 2006 Section 72 (c) and Bangladesh Labour (Amendment) Act 2013: passages and stairways shall be clean, wide and clear of all obstructions. Bangladesh Labour Law 2006, Section-62 (4): (4) In every establishment, except the exit for ordinary use, every window, door or other exit affording means of escape in case of fire shall be distinctively marked in Bangla letters by red colour or marked by other clearly understood sign	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	<u>Aisles partially faded at finishing section.JPG</u>
Explanation to the non compliance	Few aisles related issues were noted during plant tour a. Randomly checked 10 out of 25 aisles were partially obstructed by bucket, tool, trolley, stand workers and semi-finished goods sack, at cutting, sample, finishing & dyeing section in 4th floor of building 1 & 3, ground floor building 10. b. 7 out of 15 aisles were found partially faded at cutting, finishing, dyeing section at cutting, sample, finishing & dyeing section in 4th floor of building 1 & 3, ground floor building 10.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	<u>Aisles partially faded at Cutting section.JPG</u>
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that factory management should	<u>Aisles partially blocked by bucket at cutting section.JPG</u>

keep all the aisles clearly marked and passage obstacle free for emergency evacuation.




Aisles partially faded at finishing section and blocked by tool.JPG



Aisles partially blocked by semi-finished goods sack and standing worker.JPG

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037134	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	236 - No / inadequate records / registration on distribution, handling and use of hazardous materials	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Govt. delay procedure	
Local law issue	Bangladesh Petroleum Act 2016, chapter 2, section 6. No License needed for certain situation. - Notwithstanding anything contained in this chapter, no license is needed for the following cases, namely-(a) for the transport or storage of class II and class III petroleum not exceeding 2000 (two thousand) litters.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted through management interview, documentation review & plant tour that facility has 02 diesel tank in premises and stored 2270 (1135*2) litters at diesel fire water pump in basement of building 7 but facility did not have diesel storing permission for respective authority (Directorate of Explosive) for storing 2270 litters diesel. In addition, facility didn't obtain No Objection Certificate from Local Government authority (District Commissioner), and designated areas of drawings were approved from respective authority (Directorate of Explosive). However, facility applied for the certificate to the concern authority on 01.09.2022.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input checked="" type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility should collect diesel	

	storing permission for respective authority (Directorate of Explosive) for storing 2270 litters diesel and designated areas of drawings were approved from respective authority (Directorate of Explosive).	
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Non-Compliance	Evidence																												
<a href="#">[Back to findings summary]</a>																													
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	 <a href="#">Eye wash manual instead of paddle.JPG</a>																												



Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037137	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	250 - No or inadequate assessment / certificates / report / licence in place for structural safety of building including building stability certificate	
Subcategory	Building/Site Maintenance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Building Construction Act 1952, Section-3(1): Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alternation to any building, or excavate or re-excavate any tank within the area to which this Act applies;	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Noted through documents review, plant tour and management interview that facility management has taken construction approval from local Chairman "Kutubpur Union Porishad Fatullah, Narayanganj" instead of concern authority for building:1,2,3,4,5,8,9 and shed:1 to 6. In addition, facility didn't take approval for 4th floor & roof top of building 8 from concern authority.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input checked="" type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that factory should update the approval plan and collect the plan from the concerned authority.	



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Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037138	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	250 - No or inadequate assessment / certificates / report / licence in place for structural safety of building including building stability certificate	
Subcategory	Building/Site Maintenance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labor Rules-2015, Rule 353(1 & 4): 1) Before use, change or expansion of any houses, building or premises as factory, approval in writing of the inspector general or any officer empowered by him shall be taken. Provided, however, that the inspector general or any officer empowered by him shall not sanction any approval without any inspection on the spot. (4) Without written permission of the inspector general, no change in any approved layout plan may be brought.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on document review and management interview it was noted that, security dining at 4th floor of building 8 not included at floor layout pan. Moreover, in addition, mismatch found in 2nd floor of building 8 (approved as prayer room but presently facility is using as idle machine area), 3rd floor of building 1 (approved as proposed office but presently facility is using as temporary finished goods) & 3rd floor of building#5 (3rd floor is approved as knitting section but presently facility is using as grey fabric store).	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days	

	<input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility management should collect update floor layout plan from concern authority.	

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1. Factory established a policy which discourages the employment of child labour and no child labour found in the factory during the audit.
- 2. Factory has strong recruitment process to verify the workers age. 86 sampled workers' personal files were provided for review.
- 3. In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age.
- 4. There was no child or young employee observed in the facility.
- 5. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

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

**Any other comments:**

Nil

Legal age of employment:	14
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details: NA

**5 - Living Wages are Paid**  
**[Summary of Findings]**

**5: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. The facility is providing local legal minimum wage BDT 8000/month.
2. Time keeping system is electronic time card (face detection system).
3. All employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
4. Each employee was given a pay slip and signed for their wages.
5. Employees are aware of their minimum wage.
6. Wages have been recorded according to documents checked.
7. Workers get salary through Mobile banking system (Rocket) for all employees.
8. Mr. Gaur Nitai Datta-AGM (Admin & Compliance is responsible for ensuring compliance with this code.

**Evidence examined:**

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

**Any other comments:**

Nil

**Summary Information**

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 52.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 8000.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 8000.0	NO

Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 200.0 Per Week: 200.0 Per Month: 200.0	Actual Per Day: 200.0 Per Week: 200.0 Per Month: 200.0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	86 attendance records and payroll records for the month of February 2023 (Current month) 86 attendance records and payroll records for the month of June 2022 (Random month) 86 attendance records and payroll records for the month of March 2022 (Random month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The Government has announced the new pay structure which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on 25th November 2018 and amendment was done on 24 January 2019. There are two separate pay structures: for the garment workers (Schedule A), For the staff (Schedule B). Schedule A is as follows: Grade Monthly basic wage House rent 50% of the basic wage Medical allowance Conveyance allowance Food subsidy Gross monthly wage Grade 1Tk. 10938Tk. 5469Tk. 600Tk. 350 Tk. 900Tk.18257 Grade 2Tk. 9044Tk. 4522Tk. 600Tk. 350Tk. 900 Tk.15416 Grade 3Tk. 5330Tk. 2665Tk. 600Tk. 350Tk. 900Tk. 9845 Grade 4Tk. 4998Tk. 2499Tk. 600Tk. 350Tk. 900Tk. 9347 Grade 5Tk. 4683Tk. 2342Tk. 600Tk. 350Tk. 900Tk. 8875 Grade 6 Tk. 4380Tk. 2190Tk. 600Tk. 350Tk. 900Tk. 8420 Grade 7Tk. 4100 Tk. 2050Tk. 600Tk. 350Tk. 900Tk. 8000		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	8000		
Please indicate the breakdown of workforce per earnings	0% of workforce earning under minimum wage 6% of workforce earning minimum wage 94% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Facility provides attendance bonus BDT. 400 to all workers for full presence in a month. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for unauthorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	Unauthorised absence		

Please list all deductions that have not been made.	<p>a. Fines, b. Housing facility, c. Advance payments, d. Loans, e. Income tax, f. Provident fund</p>
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All working hours are reflected in the attendance record.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility management is annually reviewed the wages which is as per local law. Further facility increases minimum 5% on basic wages as increment for all grades worker whoever has completed 1 year.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input checked="" type="checkbox"/> Other
If other, please explain:	Rocket-online Mobile banking.

Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600037123	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Facility provides attendance bonus per month BDT 400 for all workers as per company policy.	
Evidence	Document review (Salary Sheets), worker and management interview.	

Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600037124	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Facility provides education scholarship for the workers' children.	
Evidence	Document review, worker and management interview.	



Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600037125	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Facility arranges annual picnic for their workers.	
Evidence	Document review (Picnic Pictures), worker and management interview.	

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

**6: Compliance Requirements**

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1. Standard working hours found 48 hours in a week at the facility.
- 2. Through employees' interview it was noted that they were aware about voluntary overtime policy.
- 3. As per the company policy all overtime will be compensated at a premium rate (200% of basic wage).
- 4. Casual leave, sick leave, festival leave was provided as per local Law.
- 5. Factory's general working hour started from 8:00 am to 5:00 pm including 1-hour lunch break from 1.00 pm to 2.00 pm. Facility has also three shifts for knitting and dyeing from 6.00 am to 2.00 pm, 2.00 pm to 10.00 pm & 10.00 pm to 6.00 am including 1-hour lunch break by rotation and two shifts for printing and washing from 8:00 am to 5:00 pm and 8:00 pm to 5:00 am including 1 hour lunch break.
- 6. Facility ensured one day off for every 7 days period, facility weekly holiday is Wednesday.
- 7. Mr. Gaur Nitai Datta-AGM (Admin & Compliance) is responsible for ensuring compliance with this code.

**Evidence examined:**

- 1. Employee interview
- 2. Payroll records
- 3. Job card records
- 4. Production records
- 5. Working hour and overtime hour policies & procedures etc.
- 6. Management interview

**Any other comments:**

Nil

**Working hours' analysis**

**Systems & Processes**

What timekeeping systems are used?      Electronic time keeping system

Is sample size same as in wages section?       Yes     No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
<b>Standard/Contracted Hours worked</b>	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Overtime Hours worked</b>	
Actual overtime hours worked in sample (State per day/week/month)	1 out of 86 workers worked 45 hours (monthly) and 12 hours (weekly) in the month of February 2023 (Current month) 26 out of 86 worker worked 52 hours (monthly) and 12 hours (weekly) in the month of June 2022 (Random month) 1 out of 86 workers worked 50 hours (monthly) and 12 hours (weekly) in the month of March 2022 (Random month)
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The maximum weekly working hour was identified 60 hours (Standard hour 48 hours+ 12 hours overtime) in every sample month.
Approximate percentage of total workers on highest overtime hours:	33%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Overtime work was found voluntary confirmed through worker interview, contract letter & employment agreement papers review.
<b>Overtime premium</b>	

<p>Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p> <p>Please give details: Facility has a policy to pay 200% of basic per hour for overtime work.</p>
<p>Is overtime paid at a premium?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% workers who work overtime were paid overtime monthly in premium rate.</p>
<p>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>	<p><input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements</p> <p><input checked="" type="checkbox"/> Other</p>
<p>Please give details</p>	<p>NA, Facility does not provide less than 125% OT premium.</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. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<p><input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)</p>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>Not Applicable, More than 60 total hours per week was not worked in the facility.</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

**7 - No Discrimination is Practiced**  
**[Summary of Findings]**

**7: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

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.
2. No gender discrimination was found in the facility; both female and male employees were distributed in all types of work.
3. The facility provides the same wage amount to male/female employees of the same rank.
4. No complaint or records found for pregnancy test.
5. There is no restriction for formation of trade union in the facility.
6. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

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

**Any other comments:**

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 99%	Female: 1%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	None		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	Not applicable as no such discrimination was noted.		
<b>Professional Development</b>			

<p>What type of training and development are available for workers?</p>	<p>1. Workers receive regular and recorded health &amp; safety training. Last Health &amp; Safety training was provided on 06.02.2023 with 31 persons. 2. Firefighting training provided as per law. Last firefighting training was provided on 13.03.2023 with 40 persons. 3. First aid, PPE training provides regularly. Last first aid and PPE training provided on 17-19.02.2023 &amp; 13.02.2023 with 151 persons &amp; 33 persons respectively.</p>
<p>Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

**8 - Regular Employment Is Provided**  
**[Summary of Findings]**

8: Compliance Requirements  
 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.  
 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.  
 Additional Elements: Responsible Recruitment  
 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.  
 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.  
 8.5 Employment agencies must only supply workers registered with them.  
 8.6 Workers pay no recruitment fee at any stage of the recruitment process.  
 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. Facility provides ID card for all workers in the time of recruitment.
2. Factory maintains service books for all workers.
3. There is no home working from the site.
4. All workers are getting appointment letter in local language.
5. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

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

**Any other comments:**

Nil

**Responsible Recruitment**

**All Workers**

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented	<input checked="" type="checkbox"/> Understood by workers
	<input checked="" type="checkbox"/> Same as actual conditions	

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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**Migrant Workers**

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





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

8A: Compliance Requirements  
 8.A.1 There should be no sub-contracting unless previously agreed with the main client.  
 8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. Facility uses Embroidery process as sub-contracting others facility.
2. Mr. Gaur Nitai Datta- AGM (HR, Admin & Compliance) is responsible for compliance with the Code.

**Evidence examined:**

1. Document review
2. Management interview
3. Employee interview
4. Policy and procedures review
5. Plant tour

**Any other comments:**

Nil

**Summary of sub-contracting – if applicable**

Is there any sub-contracting at this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Process subcontracted</b>	
Process Subcontracted	Embroidery
Name of factory	Metro Knitting & Design Mills Ltd. (Unit-2)
Address	Charabagh, Ashulia, Savar, Dhaka
Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility made calculation and no undeclared sub-contracting was found.
If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility management needs subcontractor for the processes of Embroidery, wash, Washing & Dyeing for few products which is used by taking consent from the client.
Number of sub-contractors/agents used:	1
Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility management has policy and procedure on subcontracting.
What checks are in place to ensure no child labour is being used and work is safe?	Facility has conducted internal audit and risk assessment as well as they have child labor, recruitment policy to ensure no child labor is being used in site and work is safe.

**Summary of homeworking – if applicable**

Is homeworking used at this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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**9 - No Harsh or Inhumane Treatment is Allowed**  
**[Summary of Findings]**

9: Compliance Requirements  
 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.  
 9.2 companies should provide access to a confidential grievance mechanism for all workers

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. The facility established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or indiscipline happened in the factory. Factory install complaint box in workers' toilet area. No complaint records found regarding physical abuse or harassment.  
 2. Mr. Gaur Nitai Datta-AGM (Admin & Compliance is responsible for ensuring compliance with this code.

**Evidence examined:**

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

**Any other comments:**

Nil

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.
If yes, are workers aware of these channels and have access? Please give details.	Factory has communicated this procedure through orientation training confirmed through worker interview.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Factory has fixed some complaint box in worker's toilet area. No complaint records found regarding physical abuse or harassment.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Grievance mechanism is available for workers, communities and suppliers.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:

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

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

**10A: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

It was noted through documents review and workers interview that there are no agency staffs, employment agencies and immigration workers in the factory. Mr. Gaur Nitai Datta-AGM (Admin & Compliance is responsible for ensuring compliance with this code.

**Evidence examined:**

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

**Any other comments:**

Nil

**10B4 - Environment 4–Pillar**  
**[Summary of Findings]**

**10B4: Compliance Requirements**

- 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
  - 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
  - 10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements
  - 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
  - 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
  - 10.B4.6 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).
  - 10.B4.7 Businesses shall make continuous improvements in their environmental performance.
  - 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
  - 10.B4.9 Businesses should have a nominated individual responsible for co–ordinating the site’s efforts to improve environmental performance.
- 10B4: Guidance for Observations**
- 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
  - 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1. Facility has an environmental policy which covers all the System and comply the legal requirement.
- 2. Factory surrounding environment found acceptable.
- 3. Factory has waste management policy regarding solid as well as hard waste.
- 4. Md. Nur Bahadur, Sr. Manager-ECR is Environmental responsible person of the facility.
- 5. Environmental Impact Assessment conducted by Qtex Solutions Ltd on June 2018.

**Evidence examined:**

- 1. Document review
- 2. Factory tour
- 3. Management interview
- 4. Environmental Clearance certificate review
- 5. Air emission & noise level test review

**Any other comments:**

Nil


**Environmental Analysis**

Is there a manager responsible for Environmental issues (Name and Position):	Md. Nur Bahadur, Sr. Manager-ECR is responsible person to look after environmental issues of the facility.
--	--

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has conducted risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No environmental system certification is available in the facility.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The key impacts are waste generating, air emissions, wastewater discharging, noise emissions from their production processes. And the facility has taken set the rated energy conservation and emission reduction policy.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has no other sustainability systems in place.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environmental clearance certificate (ECC) of the facility valid till 20.10.2023.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The facility has maintained a chemical register and inventory for hazardous and non- hazardous chemicals.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has a system to maintain client's requirement regarding chemical and environmental issues in the destination countries. However, no system of monitoring legislation in the destination countries is available in the facility.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has set a target to reduce water, energy. However, no wastewater is produced by the facility as facility is doing only cut to pack.



Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility recycle waste and maintain the register.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has a system of individual monitoring for water, energy and natural re-courses.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has monitoring system for their business partners through internal audit.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	718840	5130
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	119719417	9962776
Has site completed any carbon Footprint Analysis?	Yes	Yes
If Yes, please state result	21849915 kg	1787674 kg
Water Sources	Under ground and Rainwater	Under ground and Rainwater
Water Volume Used	2114695	292307
Water Discharged	ETP outlet and Govt Sewerage line	ETP outlet and Govt Sewerage line
Water Volume Discharged	1686900	231712
Water Volume Recycled	7070	6374
Total waste produced	3209885.32 kg	362453.05kg
Total hazardous waste produced	270380.52 kg	28349.05kg
Waste to recycling	57052 kg	11780.2 kg
Waste to landfill	NA	NA
Waste to other	3209885.32 kg Waste is collected by 3rd party	200734.7kg Waste is collected by 3rd party
Total Product Produced	Dyeing: 5902715.4 kg Printing: 3051970 kg Garments:18304580 pieces	Dyeing: 809209.7kg Printing: 293069 kg Garments:2408212 pieces

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600037136	
Clause	10B4 - Environment 4–Pillar	
Issue Title	620 - Hazardous waste improperly handled / stored / disposed of	
Subcategory	Waste Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labour Law 2006, Section 54: Every establishment shall take effective measures to remove any wastage created due to the production process.	
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.	
Explanation to the non compliance	It was noted during plant tour that wastes like (leftover empty broken plastic, paper, buckets, rod & damaged drum etc.) were not segregated by type of hazard and were found open to rain and sun inside the facility premises.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility management should keep the wastes in designated place with proper segregation.	
		 <a href="#">IMG_6986.JPG</a>

**10C - Business Ethics – 4-Pillar Audit**  
[Summary of Findings]

**10C: Compliance Requirements**

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.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.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10.C.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.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.
- 10C: Guidance for Observations
- 10.C.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.
- 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The factory management has business policy, anti-corruption and anti-bribery policy.  
 Facility has access to a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.  
 Facility has a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice.  
 Mr. Gaur Nitai Datta, AGM- (Admin, HR and Compliance) is responsible for look after Business Ethics Section.

**Evidence examined:**

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

**Any other comments:**

Nil

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

- Internal Policy
- Policy for third parties including suppliers

Please give details:

Facility has a business ethics policy and the policy communicated and applied internally, externally or both when needed.

<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility provides training to the personnel of sales and logistics on business ethics issues dated on February 08, 2023.</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The policy is updated when needed.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility has shared their policy and procedure to their supplier and third parties by email.</p>

## Attachments



Metro Knitting & Dyeing Ltd.-9009353-SMETA 4 Pillar-  
Photo Report.PDF



Metro Knitting & Dyeing Ltd.-9009353-SMETA 4 Pillar-  
Onsite CAPR.PDF



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