

Sedex Members Ethical Trade Audit Report

Version 6.1



| Audit Details | | | | | | |
|---|--|--|-----------------------------------|------------------------------|-------|--------------------|
| Sedex Company Reference: (only available on Sedex System) | ZC417692605 | | Sedex Site R (only available o | eference: n Sedex System) | ZS417 | 7866459 |
| Business name (Company name): | FENZY STYLES PRIV | ATEI | LIMITED | | | |
| Site name: | FENZY STYLES PRIV | ATE | LIMITED | | | |
| Site address: | Plot No- 1, 13/3, Hemla Compound DM Road, Industrial Area Faridabad 121003 IN | | Country: | | IN | |
| Site contact and job title: | Mr. Rambabu Soni / Director | | | | | |
| SMETA Audit Pillars: | Labour Standards | Health and Safety (plus Environment 2-Pillar) | | Environment 4-pillar | | Business Ethics |
| Date of Audit: | 2023-05-11 | | | | | |

| Audit Company Name: | |
|---------------------------|--|
| URS Certification Limited | |

| Audit Conducted By | | | | | | | |
|----------------------------|---|-----------|--|-------------|--|--|--|
| Affiliate Audit Company | N | Purchaser | | Retailer | | | |
| Brand owner | | NGO | | Trade Union | | | |
| Multi-stakeholder | | | Combined Audit (select all that apply) | | | | |

Audit Content:

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

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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: | Jyoti Malhotra | APSCA Number: | 21705270 | | |
| Additional Auditors: | | | | | |
| Date of declaration: | 2023-05-11 | | | | |

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. Rambabu Soni | | |
| Title: | Director | | |
| Date of declaration: | 2023-05-11 | | |
| Comments: | | | |

Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed

upon with the factory representatives

None

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Summary of Findings

| Issue | Area of Non–Conformity | | Nu | mber of iss | ues | Findings |
|---|---------------------------|---|----|-------------|-----|--|
| (please click on the issue title to go direct to the appropriate audit results by clause) | ETI | Local Law | NC | Obs | GE | |
| 0A - Universal rights covering UNGP | | | 0 | 0 | 0 | |
| 0B - Management systems and code implementation | | | 0 | 0 | 0 | |
| 1 - Freely chosen employment | | | 0 | 0 | 0 | |
| 2 - Freedom of association and right to collective bargaining are respected | | | 0 | 0 | 0 | |
| <u>3 - Working conditions are safe and hygienic</u> | 3.1 3.1 3.1 3.3 | \$1 2 3 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 | 4 | 0 | 0 | NC - ZAF600065124 NC - ZAF600065125 NC - ZAF600065126 NC - ZAF600065127 |
| 4 - Child labour shall not be used | | | 0 | 0 | 0 | |
| 5 - Living wages are paid | | | 0 | 0 | 0 | |
| 6 - Working hours are not excessive | | | 0 | 0 | 0 | |
| 7 - No discrimination is practiced | | | 0 | 0 | 0 | |
| 8 - Regular employment is provided | | | 0 | 0 | 0 | |
| 8A - Subcontracting and homeworking | | | 0 | 0 | 0 | |
| <u>9 - No harsh or inhumane treatment is</u> <u>allowed</u> | | | 0 | 0 | 0 | |
| 10A - Entitlement to work and immigration | | | 0 | 0 | 0 | |
| 10B2 - Environment 2-pillar | | | 0 | 0 | 0 | |
| 10B4 - Environment 4-pillar | | | 0 | 0 | 0 | |
| 10C - Business ethics 4-pillar | | | 0 | 0 | 0 | |

Local Law Issues

| Issue | Description |
|-------|--|
| §1 | According to Section 19(d) of The Factories Act, 1948,(1) In every factory— (a) sufficient latrine and urinal accommodation of prescribed types shall be provided conveniently situated and accessible to workers at all times while they at the factory; (b) separate enclosed accommodation shall be provided for male and female workers; ion shall be adequately lighted and ventilated, and no latrine or urinal shall, unless specially exempted in writing by the Chief Inspector, communicate with any workroom except through an intervening open space or ventilated passage; (d) all such accommodation shall be maintained in a clean and sanitary condition at all times; |
| §2 | According to Rule 68 9(e) of The Model Rules of The Factories Act, 1948, The exits shall be clearly visible and suitably illuminated with suitable arrangement, whatever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply. |
| §3 | According to Section 7A (2b) of The Factories Act, 1948, Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances. |

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| According to Section 45(1) of The Factories Act, 1948, There shall in every factory be provided and maintained so as to be readily accessible during all working hours first-aid boxes or cupboards equiped with the prescribed contents, and the number of such boxes or cupboards to be provided and maintained shall not be less than one for every one hundred and fifty workers ordinarily employed (at any one time) in |
|---|
| the factory. |

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Site Details

| Site Details | | | | | | |
|--|--|---------------------------------------|--|------------------------------|--|--|
| Company Name | FENZY STYLES PRIVATE LIMITED | | | | | |
| Site Name | FENZY STYLES PRIVATE LIMITED | | | | | |
| GPS location (if available) | GPS Address: Plot No.1, 13/3, Hemla Compound, DM Road Industri Area, Faridabad, Haryana, 121003, India | | | | | |
| | Coordinates: 28.463200, 77.30988 | | | | | |
| Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Factory license: FBD-ONLIN-CHD-A-398 for 48 employees, Valid up to December 31, 2023, Fire NOC No: FS/2023/94 dated 19.04.2023, Valid for 1 year, Pollution Exemption certificate: HSPCB/GRS/2022/5014, Dt. 11.12.2022, IEC Code & PAN No.: AADCF4599F | | | | | |
| Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc | Readymade Garments Cutting, Stitching, Fini | | | | | |
| Site description: (Include size, location, and age of site. Also, include structure and number of buildings) | The factory 'M/s. FENZY STYLES PRIVATE LIMITED' was operated at Plot No.1, 13/3, Hemla Compound, DM Road Industrial Area, Faridabad, Haryana, 121003, India. The roads were well developed. The facility was established & functioning at the audited location from January 2023 (at current location). The plot area of facility is 6993 sq. ft. and built up area is 19800 sq. ft. A total of 47 (44 males / 03 females) employees are currently working in the factory. On the day of audit 45 (42 males / 03 females) employees were present. The working hours of factory are as follows. Working Hours – 09:30 to 18:00, Lunch Break – ½ hrs., Weekly off – Sunday | | | | | |
| Structure and number of buildings | Building Name: | | FENZY ST | TYLES | | |
| | Floor | Description | n | Remark | | |
| | Ground Floor | Admin Offi & Accesso Cutting an | ce, Fabric pries store, d Dispatch | Security office at main gate | | |
| | First Floor | Production | ı | - | | |
| | Second Floor | Finishing a Packing | and | - | | |
| Visible structural integrity issues (large cracks) observed? | 🗆 Yes 🗹 No | | | | | |
| | Please give details: | | | | | |
| | No integrity issues noted | | | | | |
| Does the site have a structural engineer evaluation? | ✓ Yes □ No | | | | | |
| | Please give details: Factory has building s layout plan. | tability certi | ficate and a | pproved building | | |

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| Site function | □ Agent | \checkmark | Factory Processing/Manufacturer | | | |
|---|---|--------------|------------------------------------|--|--|--|
| | Finished Product Supplier | | Grower | | | |
| | | | Labour Provider | | | |
| | Pack house | | Primary Producer | | | |
| | Service Provider | | Sub-contractor | | | |
| Months of peak season | January to December | | | | | |
| Process overview | Store (Fabric & Accessories), Cut and Dispatch | ting, | Stitching, Finishing, Packing | | | |
| What form of worker representation is there | | | Worker Commitee | | | |
| on site? | ☑ Other | | None | | | |
| Please give details: | Grievance Committee | | | | | |
| Is there any night production work at the site? | □ Yes ☑ No | | | | | |
| Are there any on site provided worker | 🗆 Yes 🗹 No | | | | | |
| accommodation buildings | Please give details: | | | | | |
| Are there any off site provided worker | 🗆 Yes 🗹 No | | | | | |
| accommodation buildings | Please give details: | | | | | |
| Were all site provided accommodation | 🗆 Yes 🗵 No | | | | | |
| buildings included in this audit | Please give details: | | | | | |
| | No accommodation provided. | | | | | |

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| Audit Parameters | | | | | |
|---|-----------------------------|-------|--------------|--|--|
| Time in and time out | Day 1 | | | | |
| | In | 10:15 | | | |
| | Out | 18:30 | | | |
| Audit type: | FULL_INITIAL | | | | |
| Was the audit announced? | SEMI_ANNOUNCED | | | | |
| Was the Sedex SAQ available for review? | No | | | | |
| Any conflicting information SAQ/Pre-Audit Info to Audit findings? | No | | | | |
| Who signed and agreed CAPR | Mr. Rambabu Soni / Director | | i / Director | | |
| Is further information available | No | | | | |

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| 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 | | |
| Reason for absence at the opening meeting | None | | | | |
| Reason for absence during the audit | None | | | | |
| Reason for absence at the closing meeting | None | | | | |

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Worker Analysis

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

| Worker Analysis | | | | | | | | |
|---|----------------|-----------|--------|-----------|-----------|--------|---------|-------|
| | Local Migrant* | | | Home | | | | |
| | Permanent | Temporary | Agency | Permanent | Temporary | Agency | workers | Total |
| Worker numbers – male | 41 | 0 | 3 | 0 | 0 | 0 | 0 | 44 |
| Worker numbers – female | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Total | 44 | 0 | 3 | 0 | 0 | 0 | 0 | 47 |
| Number of Workers interviewed – male | 8 | 0 | 1 | 0 | 0 | 0 | 0 | 9 |
| Number of Workers interviewed – female | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| Total – interviewed sample size | 9 | 0 | 1 | 0 | 0 | 0 | 0 | 10 |

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| | Nationalities Structure | |
|--|---|----------------|
| Nationality of Management | Indian | |
| Please list the nationalities of all workers, with the three most common nationalities listed first. | Nationaility 1: INDIAN | approx %: 100% |
| Was this list completed during peak season? | ✓ Yes □ NoPlease give details: | |
| 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 |

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| Worker Interview Summary | | | | |
|--|---|--|--|--|
| Were workers aware of the audit? | 🗹 Yes 🗆 No | | | |
| Were workers aware of the code? | ☑ Yes □ No | | | |
| Number of group interviews: | 1 group of 4 workers | | | |
| Number of individual interviews: | Male: 5 Female: 1 | | | |
| All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. | ✓ Yes □ No Please give details: | | | |
| Interviews were done in private and the confidentiality of the interview process was communicated to the workers? | ☑ Yes □ No | | | |
| In general, what was the attitude of the workers towards their workplace? | ☑ Favorable □ Non-favourable □ Indifferent | | | |
| What was the most common worker complaint? | All workers interviewed had a positive attitude to management and site. | | | |
| What did the workers like the most about working at this site? | They were happy about work environment and timely payment. | | | |
| Any additional comment(s) regarding interviews: | All workers enjoyed working at the factory, they felt they had sufficient work and good relationship with management. | | | |
| Attitude of workers to hours worked: | Workers were found satisfied working at the factory, no complaints against management were heard during worker interview. It was also confirmed that overtime is voluntary, no discrimination or inhumane treatment done or supported by the management. | | | |
| Is there any worker survey information available? | □ Yes ☑ No Please give details: | | | |

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Attitude of workers:

Workers were found satisfied working at the factory, no complaints against management were heard during workers interview. They were happy to work there. It was also confirmed that overtime is voluntary, no discrimination or inhumane treatment done or supported by the management.

Attitude of worker's committee/union reps:

Workers found very positive towards the management and no negative information reported. Their attitude towards factory management seemed to be positive, because they give for the same are: on time payment, good facilities, good behavior of the management and supervisors.

Attitude of managers:

The management was found aware with the requirements of social audit and management was very co-operative and transparent during the course of audit. They were receptive towards findings. The management approach was found to be positive. The factory management had a system in place to check their current practices against their clients' requirements and the local law.

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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:

Factory has displayed abstract of various national and local laws.

Factory has responsible person for their stakeholders and sub-suppliers compliance. He's visiting time to time and checking their compliance.

All the humanitarian policies pertaining to – anti sexual harassment, abuse/harassment, child labour, forced labour are in place.

Evidence examined:

Factory has appointed HR Manager as a senior member of management responsible for compliance with the Code.

Factory has displayed the various Laws & their abstracts. All workers are well informed of the code requirements. Social policies, minimum wages notification, working hours, pay day, other mandatory notifications/ notice.

Any other comments:

None

| Policy statement that expresses commitment to respect human rights? | ✓ Yes □ NoPlease give details: |
|---|--|
| | Facility has have all the humanitarian policies pertaining to – anti sexual harassment, abuse/harassment, child labour, forced labour etc. to the employees. Facility has installed suggestion box at main gate, which workers can use to put forth their suggestion as well as their grievances to the top management. Although the facility doesn't have a worker union, they do have a worker's committee, where they can discuss their issues and reach out to the management via the committe.Workers are free to join unions & committees. |
| Are the policies included in workers' manuals? | ☑ Yes □ No |
| | Please give details: |
| | All policies are included in workers manual. |

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| Does the business have a designated person responsible for implementing | ☑ Yes □ No | |
|---|---|--|
| standards concerning Human Rights? | Please give details: | |
| | HR Manager | |
| Does the business have a transparent system in place for confidentially reporting, | ☑ Yes □ No | |
| and dealing with human rights impacts without fear of reprisals towards the | Please give details: | |
| reporter? | Facility has installed suggestion/grievance box in the premises and eating area, which workers can use to put forth their suggestion as well as their grievances to the top management. Although the facility doesn't have a worker union, they do have a worker's committee, where they can discuss their issues and reach out to the management via the committee. Workers are free to join unions, committees. | |
| Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement) | ☑ Yes □ No | |
| Does the business demonstrate effective | ☑ Yes □ No | |
| data privacy procedures for workers' information, which is implemented? | Please give details: | |
| | Factory has maintained personal files for each and every employee, which is maintained by HR department in a confidential manner. All documents / records pertaining to the worker are adequately maintained by factory. | |
| Me | easuring Workplace Impact | |
| Annual worker turnover(Number of workers | Last year 5.0% | |
| leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)) | This year 4.0% | |
| 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]) | 5.0% | |
| Annual % absenteeism(Number of days lost | Last year 4.0% | |
| through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year) | This year 2.0% | |
| 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) | 2.0% | |

Audit company:





| Are accidents recorded? | 🗹 Yes 🗆 No | | |
|--|---|------|--|
| | Please give details: | | |
| | Factory has maintained accident records there is no accidents rep | | |
| Annual Number of work related accidents | Last year | 0.0% | |
| and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers) | This year | 0.0% | |
| 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) | 0.0% | | |
| Lost day work cases per 100 | Last year | 0.0% | |
| workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers) | This year | 0.0% | |
| % of workers that work on average more | 6 month | 0.0% | |
| than 48 standard hours / week in the last 6 / 12 months | 12 month | 0.0% | |
| % of workers that work on average more | 6 month | 0.0% | |
| than 60 total hours / week in the last 6 / 12 months | 12 month | 0.0% | |

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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:

Facility has displayed abstract of various national and local laws.

Facility has provided trainings related to rules and regulations and updates by Government.

Evidence examined:

Facility has appointed HR Manager as a senior member of management responsible for compliance with the Code.

Facility has displayed the various Laws & their abstracts. All workers are well informed of the code requirements. Social policies, minimum wages notification, working hours, pay day, other mandatory notifications/ notice etc. were displayed at the entrance of the facility in English and Hindi for employees' reference.

Any other comments:

None

| Management Systems | | | | |
|---|--|--|--|--|
| In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations? | □ Yes ☑ No Please give details: | | | |
| | | | | |
| | No fines were noticed in the review documents. | | | |
| Do policies and/or procedures exist that reduce the risk of forced labour, child | ☑ Yes □ No | | | |
| labour, discrimination, harassment & abuse? | Please give details: | | | |
| | Facility has maintained all policies and procedures to reduce risk of forced labour, child labour, discrimination, harassment and abuse. The same was confirmed during document review and worker's interview. | | | |
| If Yes, is there evidence (an indication) of effective implementation? Please give details. | Facility has maintained all policies and procedures to reduce risk of forced labour, child labour, discrimination, harassment and abuse. The same was confirmed during document review and worker's interview. | | | |
| Have managers and workers received training in the standards for forced labour, | 🗹 Yes 🗆 No | | | |
| child labour, discrimination, harassment & abuse? | Please give details: | | | |
| | All managers and workers received the trainings about the updates on standards and last training date is 03.03.2023. | | | |

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| If Yes, is there evidence (an indication) that training has been effective e.g. training | 🗹 Yes 🗆 No |
|--|---|
| records etc.? Please give details | Please give details: |
| | Training records have been reviewed in personal files and same was confirmed by workers during interview. |
| Does the site have any internationally recognised system certifications e.g. ISO | □ Yes ☑ No |
| 9000, 14000, OHSAS 18000, SA8000 (or | Please give details: |
| other social audits)? | There is no certification. |
| Is there a Human Resources | 🗹 Yes 🗆 No |
| manager/department? | HR Manager is designated person for Human Resource. |
| Is there a senior person /manager responsible for implementation of the code? | ☑ Yes □ No |
| | Please give details: |
| | HR Manager is designated person for implementing the code. |
| Is there a policy to ensure all worker information is confidential? | ☑ Yes □ No |
| | Please give details: |
| | HR department has maintained separate records of all employees and keep confidential in their personal files and their systems. |
| Is there an effective procedure to ensure confidential information is kept confidential? | 🗹 Yes 🗆 No |
| conidential mornation is kept conidential? | Please give details: |
| | All systems are password protected and all information kept with HR. |
| Are risk assessments conducted to evaluate policy and procedure | ☑ Yes □ No |
| effectiveness? | Please give details: |
| | Facility has developed and implemented risk assessment analysis for the area and function. |
| Does the facility have a process to address | 🗹 Yes 🗆 No |
| issues found when conducting risk assessments, including implementation of | Please give details: |
| controls to reduce identified risks? | Facility has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks. |
| Does the facility have a policy/code which | 🗹 Yes 🗆 No |
| require labour standards of its own suppliers? | Please give details: |
| | All abstracts & social policies like child labour, forced labour, discrimination, anti-sexual harassment were reviewed on the day of audit and same were posted on the notice board near the security office and same was confirmed during interview with the workers and documents review. |
| | Land Rights |
| Does the site have all required land rights | ☑ Yes □ No |
| licenses and permissions (see SMETA Measurement Criteria)? | Please give details: |
| | Facility had obtained "Business License" and "Approved Plant Layout" from the concerned authority which is found valid. |

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| Does the site have systems in place to conduct legal due diligence to recognize | 🗹 Yes 🗆 No |
|---|---|
| and apply national laws and practices | Please give details: |
| relating to land title? | Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title. |
| Does the site have a written policy and procedures specific to land rights? | ☑ Yes □ No |
| | Please give details: |
| | Facility had obtained "Business License" and "Approved Plant Layout" from the concerned authority which is found vali |
| Is there evidence that facility/site compensated the owner/lessor for the land | □ Yes 🗵 No |
| prior to the facility being built or expanded? | Please give details: |
| | Facility was built-up as per well maintain concrete building and they have approved building layout plan. |
| Does the facility demonstrate that alternatives to a specific land acquisition | ☑ Yes □ No |
| were considered to avoid or minimize | Please give details: |
| adverse impacts? | They have all legal permits and comply with social as well as legal compliance. |
| Is there any evidence of illegal appropriation of land for facility building or | □ Yes 🗹 No |
| expansion of footprint? | Please give details: |
| | There is no evidence of illegal appropriation of land for facility building. |

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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:

Factory has a policy like no child labour & no forced labour. Personnel records file (to check for ID's, terms & condition, evidence of force labour policy).

Evidence examined:

Workers interviews confirmed that they can leave their employer after reasonable notice. During workers interviews confirmed that they are not required to submit any original documents or any deposits with the employer.

During audit process on the day of audit, there was no evidence of forced, bonded or prison labour in the factory. They also confirmed that they are working voluntarily in the factory.

Any other comments:

None

| Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, | 🗆 Yes 🗵 No |
|---|---|
| please give details and category of workers affected) | Please give details: |
| Is there any evidence of a loan scheme in operation (If yes, please give details and | □ Yes 🗵 No |
| category of workers affected) | Please give details: |
| Is there any evidence of retention of wages / deposits (If yes, please give details and | □ Yes 🗵 No |
| category of workers affected) | Please give details: |
| Are there any restrictions on workers' freedom to terminate employment? | 🗆 Yes 🗹 No |
| | Please give details: |
| | There is no restrictions on workers' freedom to terminate employment they can leave their employer after reasonable notice. |
| If any part of the business is UK based or registered there & has a turnover over | □ Yes □ No ☑ Not Applicable |
| £36m, is there a published a 'modern day | Please give details: |
| slavery statement? | There is not UK based business. |
| Is there evidence of any restrictions on workers' freedoms to leave the site at the | 🗆 Yes 🗵 No |
| end of the work day? | Please give details: |
| | Workers can freely leave the site at the end of the work day. There is no restrictions on workers, it is confirmed in the worker interview. |
| workers' freedoms to leave the site at the | Please give details: Workers can freely leave the site at the end of the work day. There |

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| Does the site understand the risks of forced / trafficked / bonded labour in its supply chain | □ Yes □ No ☑ Not Applicable Please give details: | | |
|---|---|--|--|
| | Factory has understood the risks and they have maintained a policy on forced / trafficked / bonded labour. During audit process on the day of audit, there was no evidence of forced, bonded or prison labour in the factory. They also confirmed that they are working voluntarily in the factory. | | |
| Is the site taking any steps taking to reduce the risk of forced / trafficked labour? | 🗹 Yes 🗆 No | | |
| | Please give details: | | |
| | Factory has maintained all policies and procedures to reduce risk of forced labour, child labour, discrimination, harassment and abuse. The same was confirmed during document review and worker's interview. | | |

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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:

Factory has a policy on freedom of association and collective bargaining. Factory does not obstruct workers to form or join any legal trade unions of their choice. There was no evidence of suppression of worker rights.

Evidence examined:

Workers interviews confirmed that workers have access to members at work place and management does not interfere in their rights.

Factory has formed workers committee with elected workers representatives.

It was observed from the records of the meeting that factory conducts meetings and minutes are documented. Last meeting was held on 04.03.2023.

Verified factory policy on freedom of association and collective bargaining and found that it was in compliance with ETI requirements and local law requirement.

No union or association is functioning in the factory.

Suggestion boxes were installed inside of main gate, so that the employees can post their views confidentially. The management provided free access to the proprietor for the same.

Any other comments:

None

| What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox) | □ Union☑ Other | Worker CommiteeNone | |
|---|--|--|--|
| Other details: | No union present in the facility and its not legally required. No workers committee in the facility and its not legally required as workers strength is less than 100. However, facility has grievance committee. | | |
| Is it a legal requirement to have a union? | 🗆 Yes 🗹 No | | |
| Is it a legal requirement to have a worker's committee? | □ Yes ☑ No | | |

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| Is there any other form of effective | ☑ Yes □ No |
|---|--|
| worker/management communication channel? (Other than union/worker | Please give details: |
| committee e.g. H&S, sexual harassment) | H&S committee and sexual harassment prevention committee/complain committee and suggestion boxes were installed in the premises and employees can share their concerns and they can approach to the management directly for any requirement. Factory has formed H&S and Sexual Harassment preventive committee. Company policy on equal opportunities and inhumane treatment. Committee representatives / members have held meetings from time to time at regular intervals. Last H&S meeting was held on 20.04.2023 and Sexual harassment committee on 04.03.2023. |
| Is there evidence of free elections? | 🗆 Yes 🗵 No |
| Does the supplier provide adequate facilities to allow the Union or committee to | □ Yes 🗵 No |
| conduct related business? | Please give details: |
| | Factory does not obstruct workers to form or join any legal trade unions of their choice. |
| Name of union and union representative, if applicable: | N/A |
| Is there evidence of free elections? | 🗆 Yes 🗆 No 🖂 Not Applicable |
| If there is no union, is there a parallel means of consultation with workers e.g. worker committees? | No union present in the facility and its not legally required. No workers committee in the facility and its not legally required as workers strength is less than 100. However, facility has grievance committee. |
| Is there evidence of free elections? | □ Yes □ No ☑ Not Applicable |
| Are all workers aware of who their representatives are? | 🗹 Yes 🗆 No |
| | Please give details: |
| | Grievance committee representative and he was present in the opening and closing meeting. |
| Were worker representatives freely elected? | □ Yes 🗵 No |
| Date of last election: | null |
| Do workers know what topics can be raised with their representatives? | ☑ Yes □ No |
| Were worker representatives/union representatives interviewed? | ☑ Yes □ No |
| If Yes, please state how many: | 1.0 |
| Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc. | Grievance committee is arranging meeting within three months and gathering problems coming from workers' end and approaching them to the management. Last meeting was conducted on 04.03.2023. |
| Are any workers covered by Collective Bargaining Agreement (CBA)? | 🗆 Yes 🗹 No |

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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:

HR Head is responsible for Health & Safety aspects for the site.

Potable water was freely available in all areas and test certificates were up-to-date.

Ventilation, temperature and lighting were adequate for the production processes.

Fire-fighting equipment such as 29 fire extinguishers, 02 fire hose reel, 02 fire hydrants, 4 fire alarm and call points and 06 emergency lights were provided in the facility.

Fire drills were organized and recorded every 2 months as per the law. Last fire drill was conducted on 04.03.2023.

Facility has marked all the exits and emergency exits in a language understood by majority of the employees. 05 persons are trained on use of fire-fighting equipment.

Adequate number of first aid boxes (03) with prescribed contents are kept at all sections of the factory. 04 first aider trained from St. John Ambulance.

All machine and electrical equipment was maintained in good condition.

There were competent mechanic & electricians at the site to do the electrical work.

Facility had obtained periodic inspection certificate for all the machineries used.

Facility has provided first aid boxes with basic first aid contents.

Evidence examined:

Factory has obtained factory license for 48 employees, valid till 31.12.2023. Accident and Injury records. Minutes of meeting records of committees. H&S policy. Pressure vessel inspection verified. Fire mock drill record. List of first aid box, fire extinguishers and training records of first aid and fire fighting operations.

Any other comments:

None

| 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: Minutes of meeting was done on 20.04.2023, same was confirmed |
| | in workers interview. |

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| Are the policies included in workers' manuals? | 🗹 Yes 🗆 No |
|---|--|
| | Please give details: |
| | All policies are included in the workers manual. |
| Are there any structural additions without required permits/inspections (e.g. floors | □ Yes 🗵 No |
| added)? | Please give details: |
| | There were no structural additions without prior permits/inspections. |
| Are visitors to the site informed on H&S and provided with personal protective | ☑ Yes □ No |
| equipment? | Please give details: |
| | Briefing to all visitors about H&S, prior to visit in the production areas and they have provide PPE's, like face mask, ear plug etc. |
| Is a medical room or medical facility provided for workers?(This section is to list | □ Yes 🗹 No |
| evidence to support system description | Please give details: |
| (Documents examined & relevant comments. Include renewal/expiry date where appropriate)) | No medical room and its not legally required. Only first aid treatment provided to the workers, after that refer to the ESI hospital, if there is any serious. |
| Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid? | 🗹 Yes 🗆 No |
| | Please give details: |
| | Full time trained nurse appointed for the first aid and there are trained first aid persons by saint john ambulance. |
| Where the facility provides worker transport – is it fit for purpose, safe, maintained and | □ Yes 🗹 No |
| operated by competent persons e.g. buses and other vehicles? | Please give details: |
| and other vehicles? | All workers are coming from nearby areas and use their own vehicles or public transports. |
| Is secure personal storage space provided for workers in their living space and is fit for | □ Yes 🗹 No |
| purpose? | Please give details: |
| | There is no living space inside of the premises. |
| Are H&S Risk assessments are conducted (including evaluating the arrangements for | 🗹 Yes 🗆 No |
| workers doing overtime e.g. driving after a long shift) and are there controls to reduce | Please give details: |
| identified risk? | Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks. |
| Is the site meeting its legal obligations on environmental requirements including | ☑ Yes □ No |
| required permits for use and disposal of natural resources? | Please give details: |
| | Facility has all legal permits related to the environment requirements. |

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| Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals? | ☑ Yes □ NoPlease give details: |
|--|--|
| | Facility has a responsible person for the H&S and Environmental things. That person take care about all standards, including the use of banned chemicals, however they were not using any banned chemicals in their process. |

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| | Non-Compliance | Evidence |
|---|--|-----------------------------------|
| [Back to findings s | summary] | |
| | Non-Compliance | |
| Status | OPEN | |
| Reference | ZAF600065124 | |
| Clause | 3 - Working Conditions are Safe and Hygienic | |
| Issue Title | 329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic / not clean | |
| Subcategory | Hygiene Facilities & Housekeeping | |
| New or carried over? | ☑ New □ Carried Over | |
| Root cause | 🗆 Training 🛛 System | |
| | Costs Lack of workers | |
| | Other | |
| Root cause - Other | | |
| Local law issue | According to Section 19(d) of The Factories Act, 1948,(1) In every factory— (a) sufficient latrine and urinal accommodation of prescribed types shall be provided conveniently situated and accessible to workers at all times while they at the factory; (b) separate enclosed accommodation shall be provided for male and female workers; ion shall be adequately lighted and ventilated, and no latrine or urinal shall, unless specially exempted in writing by the Chief Inspector, communicate with any workroom except through an intervening open space or ventilated passage; (d) all such accommodation shall be maintained in a clean and sanitary condition at all times; | towel and soap not providedjpg |
| ETI code | 3.3 - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. | |
| Explanation to the non compliance | It was noted during factory tour that towel & soap not provided in worker toilets with wash basins. | |
| Follow up method | □ Follow up audit | |
| Timescale | □ Immediate 	☑ 30 days 	□ 60 days | |
| | □ 90 days □ 120 days □ 180 days | |
| | □ 365 days □ Other | |
| Actions | Factory should provide towel & soap in worker toilets with wash basins. | |

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| | Non-Co | ompliance | | | Evidence |
|-----------------------------------|---|---|---|---|----------|
| [Back to findings | summary] | | | Т | |
| | Non-Co | ompliance | | | |
| Status | OPEN | | | | |
| Reference | ZAF600065125 | | | | |
| Clause | 3 - Working Cond | litions are Safe ar | nd Hygienic | | |
| Issue Title | 210 - Inadequate | / poorly functionin | g emergency lighting | | |
| Subcategory | Fire Safety - Fire | exits | | | |
| New or carried over? | ☑ New | 🗆 Ca | arried Over | | |
| Root cause | Training | ⊡ Sy | /stem | | |
| | ☑ Costs | 🗆 La | ack of workers | | |
| | □ Other | | | | |
| Root cause - Other | | | | | NK / |
| Local law issue | Factories Act, 19 and suitably illum whatever artificia purpose, to main | 48, The exits shal inated with suitab I lighting is to be a | idopted for this lumination in case of | | |
| 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>VERGENCY LIGHTS</u> <u>VOT PROVIDED.jpg</u> | |
| Explanation to the non compliance | During factory too was not installed | | t emergency light | | |
| Follow up method | □ Follow up auc | lit 🗹 De | esktop audit | | |
| Timescale | 🗆 Immediate | ⊠ 30 days | □ 60 days | | |
| | □ 90 days | □ 120 days | □ 180 days | | |
| | □ 365 days | □ Other | | | |
| Actions | Factory shall ens lights to all stairs. | ure to install indus | strial emergency | | |

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| ReferenceZAClause3 -Ssue Title27SubcategoryPeIew or carriedImage: Subcategory | Non-Co DPEN AF600065126 - Working Condi 78 - Personal Pro ut incidents of we ppropriate Personal Protectiv 2 New | otective Equipm orkers not using /e Equipment/Cl □ C | ent (PPE) provided PPE where | |
|--|---|---|---|---|
| ReferenceZAClause3 -Ssue Title27SubcategoryPeIew or carriedImage: Subcategory | DPEN AF600065126 - Working Condi 78 - Personal Pro ut incidents of we ppropriate Personal Protectiv New New | itions are Safe a otective Equipm orkers not using /e Equipment/Cl | ent (PPE) provided PPE where othing | |
| ReferenceZAClause3 -Ssue Title27SubcategoryPeIew or carriedImage: Subcategory | AF600065126 - Working Condi 78 - Personal Pro ut incidents of we ppropriate Personal Protectiv New New | otective Equipm orkers not using /e Equipment/Cl □ C | ent (PPE) provided PPE where othing | |
| Clause 3 - ssue Title 27 bu ap Subcategory Pe lew or carried Image: Second | Working Condition 78 - Personal Production personal Protective Personal Protective New Training | otective Equipm orkers not using /e Equipment/Cl □ C | ent (PPE) provided PPE where othing | - |
| Subcategory Perver? | 78 - Personal Pro ut incidents of we ppropriate Personal Protectiv New Training | otective Equipm orkers not using /e Equipment/Cl □ C | ent (PPE) provided PPE where othing | - |
| bu ap Subcategory Pe lew or carried ver? | ut incidents of we ppropriate Personal Protectiv New Training | orkers not using /e Equipment/Cl | PPÈ whère | - |
| lew or carried ver? | NewTraining | | - | |
| ver? | Training | | Carried Over | |
| toot cause □ | - | V 5 | | |
| | ∃ Costs | | System | |
| | | | ack of workers | |
| |] Other | | | |
| Root cause - Other | | | | |
| 19 fac in | 948, Every occup | pier should have ig safety and ab the use, handlii | | |
| pro the ste he co pro | 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. | | | |
| | Ouring factory tou y the button mac | | at Eye glass not used | |
| ollow up |] Follow up aud | it 🗹 🗆 | Desktop audit | |
| imescale 🗆 | Immediate | ⊠ 30 days | □ 60 days | |
| | ∃90 days | 🗆 120 days | □ 180 days | |
| | ∃ 365 days | □ Other | | |
| ctions Fa | actory should pronachine operators | ovide PPE using s. | training to the button | |

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| | Non-Co | mpliance | | | Evidence |
|---|---|--|---|---|----------------------|
| [Back to findings s | ummary] | | | | |
| | Non-Co | mpliance | | | |
| Status | OPEN | - | | | |
| Reference | ZAF600065127 | | | | |
| Clause | 3 - Working Condi | tions are Safe a | nd Hygienic | | |
| Issue Title | 289 - First aid box contents out of da | available but co te or otherwise i | ntents are missing / nadequate | | |
| Subcategory | First Aid / Acciden | ts | | | |
| New or carried over? | ⊡ New | □ C | arried Over | | |
| Root cause | Training | ⊠ S | ystem | | |
| | □ Costs | | ack of workers | | |
| | □ Other | | | | |
| Root cause - Other | | | | | |
| Local law issue | There shall in ever so as to be readily first-aid boxes or c contents, and the to be provided and | ry factory be pro accessible durin cupboards equip number of such maintained sha hundred and fift | y workers ordinarily | | INADEQUATE FIRST AID |
| ETI code | provided, bearing the industry and o steps shall be take health arising out | in mind the prev f any specific ha en to prevent acc of, associated wi minimising, so f uses of hazards | cidents and injury to ith, or occurring in the far as is reasonably | 9 | <u>BOX.jpg</u> |
| Explanation to the non compliance | It was noted during and trained persor boxes. | g factory tour thans list not display | at first aid contents lis /ed with first aid | t | |
| Follow up method | Follow up audi | t 🖸 D | esktop audit | | |
| Timescale | Immediate | ⊡ 30 days | □ 60 days | | |
| | □ 90 days | □ 120 days | □ 180 days | | |
| | □ 365 days | □ Other | | | |
| Actions | Factory shall provi persons list with fi | | s list and trained | | |

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Audit company:

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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:

Facility has policies made on 'child labour prohibition' in front of gate and followed same. Facility has maintained personnel files with the age proofs of all workers, like ID card, voter card or dental certificate.

Evidence examined:

Employees' personal files were reviewed and verified.

Verified Factory policies made on 'child labour prohibition' which is in accordance to ETI requirements.

Any other comments:

None

| Legal age of employment: | 14 |
|--|--------------------------------|
| Age of youngest worker found: | 19 |
| Are there children present on the work floor but not working at the time of audit? | □ Yes ☑ No |
| Percentage of under 18's at this site (of total workers) | 0.0% |
| Are workers under 18 subject to hazardous work assignments? | 🗆 Yes 🗹 No |
| | Please give details: |
| | There is no under age workers. |

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5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The employees were paid regular wages on monthly basis.

Payments are in bank accounts to all of employees on or before 7th day of every month.

Abstracts of minimum wages Act, payment of wages Act, factories Act, payment day etc. are displayed at notice board.

All employees are issued pay-slips.

All sample employees were given the regulatory benefits like leave, holiday benefits and welfare fund etc. under the law framework.

Evidence examined:

Verified employee's leave records for the sample months. Verified Factory policies made on 'remuneration' which is in accordance to ETI requirements. Verified employee's time, wage, overtime, paystub, statutory benefits, records of April 2023, March 2023 &

January 2023.

Any other comments:

None

| | Summary Information | | |
|--|---------------------|--------------------|---|
| Criteria | Local Law | Actual at the Site | Is this part of a Collective Bargaining Agreement? |
| Standard/Contracted work hours: | Legal Maximum | Actual | NO |
| (Maximum legal and actual required | Per Day: 8.0 | Per Day: 8.0 | |
| working hours excluding overtime, please | Per Week: 48.0 | Per Week: 48.0 | |
| state if possible per day, week, and month) | Per Month: null | Per Month: 208.0 | |
| Overtime hours: | Legal Maximum | Actual | NO |
| (Maximum legal and actual overtime hours, | Per Day: 2.0 | Per Day: 0.0 | |
| please state if possible per day, week, and | Per Week: 12.0 | Per Week: 0.0 | |
| month) | Per Month: null | Per Month: 0.0 | |
| Wage for standard/contracted hours: | Legal Maximum | Actual | NO |
| (Minimum legal and actual minimum wage | Per Day: 393.97 | Per Day: 0.0 | |
| at site, please state if possible per hr, day, | Per Week: null | Per Week: 0.0 | |
| week, and month) | Per Month: null | Per Month: 10250.0 | |

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| 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: 98.5 Per Week: null Per Month: null | Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0 | NO |
|---|---|---|--|
| | Wages Analysis: | | |
| Were accurate records shown at the first request? | ☑ Yes □ No | | |
| Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria) | 10 from January 2023 10 from March 2023 10 from April 2023 | | |
| Are there different legal minimum wage grades? If Yes, please specify all. | ✓ Yes □ No Un-slilled- Rs. 393.97 per day / Semi-Skilled (A) - Rs. 413.67 per day / Semi-Skilled (B) - Rs. 434.35 per day, Skilled (A) - 456.07 per day / Skilled (B) - 478.87 per day / Highly Skilled - 502.82 per day | | |
| If there are different legal minimum grades, are all workers graded and paid correctly? | ✓ Yes □ No □ I Please give details: | Not Applicable | |
| For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | □ Below legal min □ Meet ☑ Above | | |
| Lowest actual wages found: Note: full time employees and please state hour / week / month etc. | 10250 per month (394.230/day) | | |
| Please indicate the breakdown of workforce per earnings | 0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage | | |
| Bonus Scheme found: Please specify details: | Bonus Scheme found:According to Section 10 of The Payment of Bonus Act, 1965, every employer shall be bound to pay to every employee a minimum bonus which shall be 8.33% of the salary or wage earned by the employee during the accounting year or one hundred rupee whichever is higher. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. | | ound to pay to every 8.33% of the salary or counting year or one |
| What deductions are required by law e.g. social insurance? Please state all types: | EPF: 12% from the basic wage ESI: 0.75% from the total earned wage Labour Welfare fund : As per Haryana Govt. norms | | norms |
| Have these deductions been made? | 🗹 Yes 🗆 No | | |
| Please list all deductions that have been made. | EPF: 12% from the basic wage ESI: 0.75% from the total earned wage Labour Welfare fund : As per Haryana Govt. norms | | norms |
| Please list all deductions that have not been made. | No deductions apart fr | rom legal deductions. | |
| Were appropriate records available to verify hours of work and wages? | ☑ Yes □ No | | |
| Were any inconsistencies found? (if yes describe nature) | □ Yes ☑ No | | |

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| Do records reflect all time worked? (For instance, are workers asked to attend | ☑ Yes □ No | | | |
|--|--|--|--|--|
| meetings before or after work but not paid for their time) | Please give details: | | | |
| | All trainings and meetings of the workers were attended during working hours. | | | |
| Is there a defined living wage: This is not normally minimum legal wage. If | □ Yes 🗵 No | | | |
| answered yes, please state amount and source of info: | Please give details: | | | |
| Please see SMETA Best Practice Guidance and Measurement Criteria. | | | | |
| If yes, what was the calculation method | ISEAL/Anker Benchmarks | | | |
| used. | □ Figures provided by Unions □ Living Wage Foundation UK | | | |
| | □ Fair Wear Wage Ladder □ Fairtrade Foundation | | | |
| | Other – please give details: | | | |
| Are there periodic reviews of wages? If Yes give details (include whether there is | ☑ Yes □ No | | | |
| consideration to basic needs of workers | Please give details: | | | |
| plus discretionary income). | Wages are reviewed according to revision of minimum wages notification of Govt. | | | |
| Are workers paid in a timely manner in line with local law? | ☑ Yes □ No | | | |
| Is there evidence that equal rates are being paid for equal work: | 🗹 Yes 🗆 No | | | |
| | Please give details: | | | |
| | During review of documents and workers interview, it was noted that equal rates are paid for equal work. | | | |
| How are workers paid: | Cash Cheque | | | |
| | ☑ Bank Transfer | | | |



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:

During discussion with management it was noted that presently, the factory records were maintained in bio metric machine for all the employees.

During discussion with facility management and interview with workers it was noted that factory works in single shift.

Factory provides lunch break of 30 minutes to all of the workers.

Factory operates from Monday to Saturday weekly day off is Sunday.

Evidence examined:

Security guards' duty records i.e. duty chart of the security guards. Records of actual in and out time for the sample months April 2023, March 2023 and January 2023. Accident / Injury register.

Materials movement records: Inward / Outward register.

Any other comments:

None

| Working hours' analysis | |
|--|----------------------|
| Systems & Processes | |
| What timekeeping systems are used? | Bio Metric machines |
| Is sample size same as in wages section? | 🗹 Yes 🗆 No |
| | Please give details: |
| Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.) | ☑ Yes □ No |
| Are there any other types of contracts/employment agreements used? | 🗆 Yes 🗹 No |

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| Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.) | □ Yes ☑ No |
|--|--|
| Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day- period? | □ 1 in 7 days □ 2 in 14 days □ No (please explain) |
| Is this allowed by local law? | ☑ Yes □ No |
| Maximum number of days worked without a day off (in sample): | 6 |
| Standa | ard/Contracted Hours worked |
| Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency) | □ Yes ☑ No % of workers: null% |
| | Frequency: |
| Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.) | □ Yes ☑ No |
| | Overtime Hours worked |
| Actual overtime hours worked in sample (State per day/week/month) | 0 Hrs. |
| Combined hours (standard or contracted + overtime hours = total) over 60 found? | □ Yes ☑ No |
| | Please give details: 0 Hrs. |
| Approximate percentage of total workers on highest overtime hours: | 0.0% |
| Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements) | Yes Do Conflicting Information Please give details: No overtime conducted in the factory, However as per the overtime policy, overtime is voluntary. |
| | Overtime premium |
| Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages) | □ Yes □ No □ N/A – there is no legal requirement to OT premium |
| wages) | Please give details: |
| | No overtime conducted in the factory. However, facility has policy to pay 200% of the regular wages. |
| Is overtime paid at a premium? | ✓ Yes □ No No overtime conducted in the factory. However, facility has policy to pay 200% of the regular wages. |
| If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. | ☑ No ☑ Consolidated pay ☑ Collective Bargaining agreements ☑ Other |

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| Please give details | Not Applicable.No overtime conducted in the factory. However, facility has policy to pay 200% of the regular wages. |
|--|---|
| 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) | ✓ Overtime is voluntary □ Onsite Collective bargaining allows 60+ hours/week is voluntary □ Site can demonstrate exceptional circumstances □ Onsite Collective bargaining allows 60+ hours/week is voluntary □ Site can place to protect worker's health and safety |
| Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other | No overtime conducted in the factory. |
| Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes? | □ Yes ☑ No |
| If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule? | □ Yes ☑ No |





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:

Factory hires workers based exclusively on their ability to perform the job. There was no evidence of discrimination in hiring, workers of different caste; religion, age etc. were seen to be working in the factory. Workers also confirmed during interviews that they do not feel discriminated in the factory in any respect.

Evidence examined:

Discrimination Policy. Verification of sampled employee's personal files. Recruitment Policy.

Any other comments:

None

| Gender breakdown of Management + Supervisors (Include as one combined group) | Male: 90.0% | , 0 | Female: 10.0% |
|---|---|---|---|
| Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst) | 1 | | |
| Is there any evidence of discrimination based on race, caste, national origin, | Hiring | Compensation | Access to training |
| religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation? | Promotion | Termination or retirement | No evidence of discrimination found |
| Please give details | No evidence of discrin document review and | | |
| Professional Development | | | |
| What type of training and development are available for workers? | Induction training, Fire training, Skill developr training, Machinery sa Chemical handling tra | ment training about th fety / operating traini | neir works, ETI code |
| Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details) | ☑ Yes □ No | | |

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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:

Factory have the employment policy and procedures. Factory issues appointment letters to all their workers.

Evidence examined:

Employment policies and procedures have reviewed. Employment orders and personal file of the employees.

Any other comments:

None

| Responsible Recruitment | |
|---|--|
| All Workers | |
| Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions? | ✓ Terms & Conditions presented ✓ Understood by workers ✓ 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) | □ Yes ☑ No |
| Migrant Workers | |
| Type of work undertaken by migrant workers: | No migrant workers evident from any foreign countries. |
| 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 |

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| Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker? □ Yes ☑ No Is there any observation on this finding? None Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers) □ Yes ☑ No | |
|--|----------------------|
| transaction supplied by the facility to the worker? No migrant workers evident from any foreign countries. Is there any observation on this finding? None Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal □ Yes ☑ No | |
| worker? No migrant workers evident from any foreign countries. Is there any observation on this finding? None Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal Image: State St | |
| Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal | |
| or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal | |
| | |
| Non-employee workers | |
| Recruitment Fees | |
| Are there any fees? □ Yes ☑ No | |
| Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid agency.) | but paid I by the |
| Number of agencies used (average): 1 | |
| Please provide the names of agencies if applicable Security Agency | |
| Were agency workers' age / pay / hours included within the scope of this audit? □ No | |
| Were sufficient documents for agency workers available for review? | |
| Is there a legal contract agreement with all agencies? | |
| Please give details: | |
| Factory has legal contract with agency. | |
| Does the site have a system for checking □ Yes □ No labour standards of agencies? | |
| Please give details: | |
| Site have system for checking their labour standards of age Facility management frequently visited their areas, where m the agencies workers are living and check their living standa | nost of |
| Contractors (Contractors in this context are generally individuals who supply several workers to a site. U the contractors are paid by the site and the wages of the workers are paid by the contractor. Common t include, gang bosses, labor provider.) | lsually terms |
| Any contractors on site? | |
| Please give details: | |
| There is no contract workers. | |
| Do all contractor workers understand their terms of employment? □ Yes ☑ No | |
| Please give details: | |
| There is no contract workers. | |

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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:

It was verified through document review, factory tour, management interview, production records, goods movement records and workers interview that No sub-contracting process is at the site.

Evidence examined:

Document Review. Factory Tour. Management interview. Worker interview. Internal audit reports Purchase order files. Material inward/outward records.

Any other comments:

None

| Summary of sub-contracting – if applicable | |
|--|------------|
| Is there any sub-contracting at this site? | 🗆 Yes 🗵 No |
| Summary of homeworking – if applicable | |
| Is homeworking used at this site? | 🗆 Yes 🗹 No |

Limited





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:

During workers interviews, there were no complaints or issues raised on harassment in any manner in the factory.

Company policy on equal opportunities and inhumane treatment. Factory has formed a Sexual Harassment Prevention Committee/Complaint committee. There was no evidence of harassment in any form observed in the factory.

Evidence examined:

Discussion with worker in meeting.

Any other comments:

None

| Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party? | 🗹 Yes 🗆 No |
|---|---|
| | Please give details: |
| | Through grievance committee, suggestions boxes and health and safety committee, workers can directly approach to the management to get the same resolved. This was confirmed through worker's interview and document review. |
| If yes, are workers aware of these channels and have access? Please give details. | All workers are well aware about the channels (grievance committee, suggestions boxes and health & safety committee) and same was verified through factory tour, documents review and workers interview. Contact details of public authorities (police, fire station and labor department etc), have been displayed on notice board. |
| If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details. | All workers are well aware about the channels (grievance committee, suggestions boxes and health & safety committee) and same was verified thr factory tour, documents review and workers interview. Contact details of public authorities (police, fire station and labor department etc), have been displayed on notice board. |
| Which of the following groups is there a | Worker Communities |
| grievance mechanism in place for? | □ Suppliers ☑ Other |
| Please provide grievance mechanism details | Grievance committee |
| Are there any open disputes? | 🗆 Yes 🗹 No |
| | Please give details: |
| | |

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





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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The factory has taken copies of all relevant identification documents from all workers and maintains the same in their personal files.

All workers working in the factory were found to be Indian nationals and they have rights to work anywhere in India, same was confirmed in management and workers interviews.

Evidence examined:

Employee's personal files. Recruitment process.

Any other comments:

None

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10B2 - Environment 2–Pillar [Summary of Findings]

10B2: Compliance Requirements

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

10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current Systems:

The facility tour covered health & safety & environmental. Policy is displayed at conspicuous locations, which commits to continually improve the performance of environmental issues.

The facility is having a valid environmental certificate from the competent authority.

The factory provided environment assessment documents for auditors review.

All workers working in the factory were found to be Indian nationals and they have rights to work anywhere in India, same was confirmed in management and workers interviews.

The factory has taken copies of all relevant identification documents from all workers and maintains the same in their personal files.

Factory have legally obtained and valid pollution consents.

Evidence examined:

All legally required environmental documents were provided for review.

Environmental policy Energy bills

Water consumption bill

Worker and management interview.

Site tour

Environmental system manual. Environment training Environment legal register

Any other comments:

None

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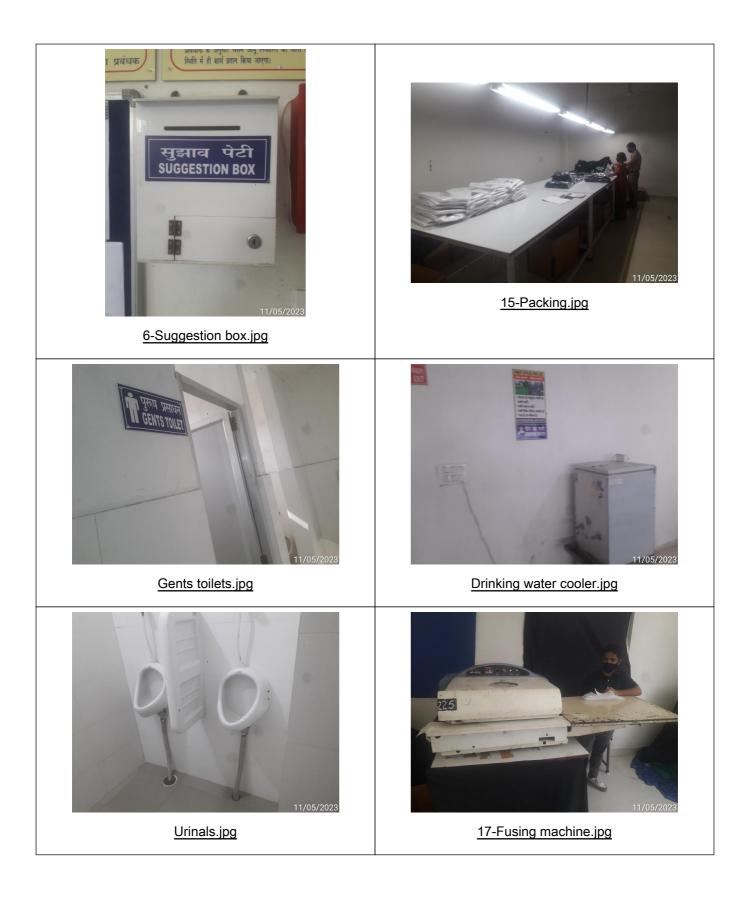
Attachments



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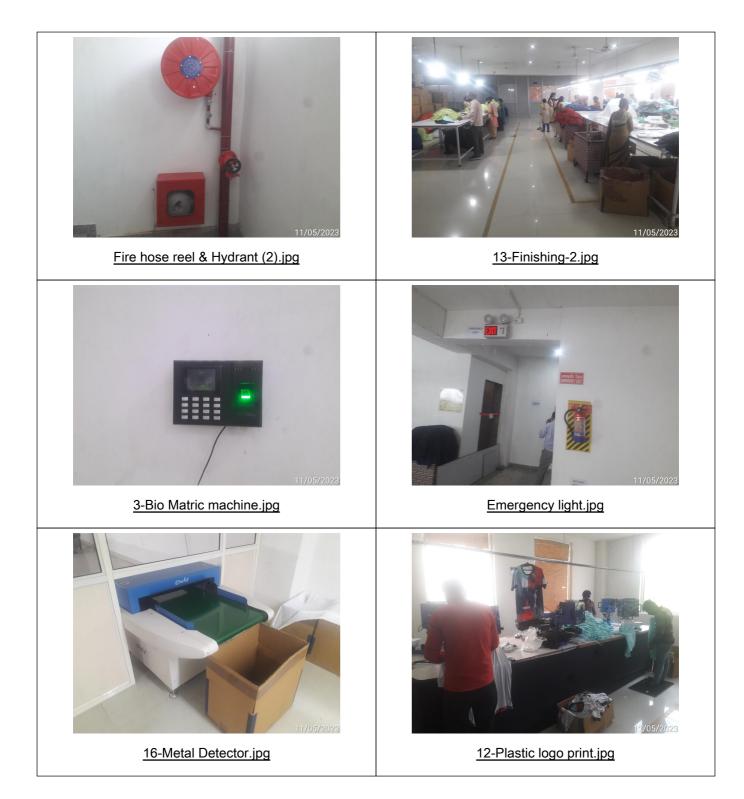




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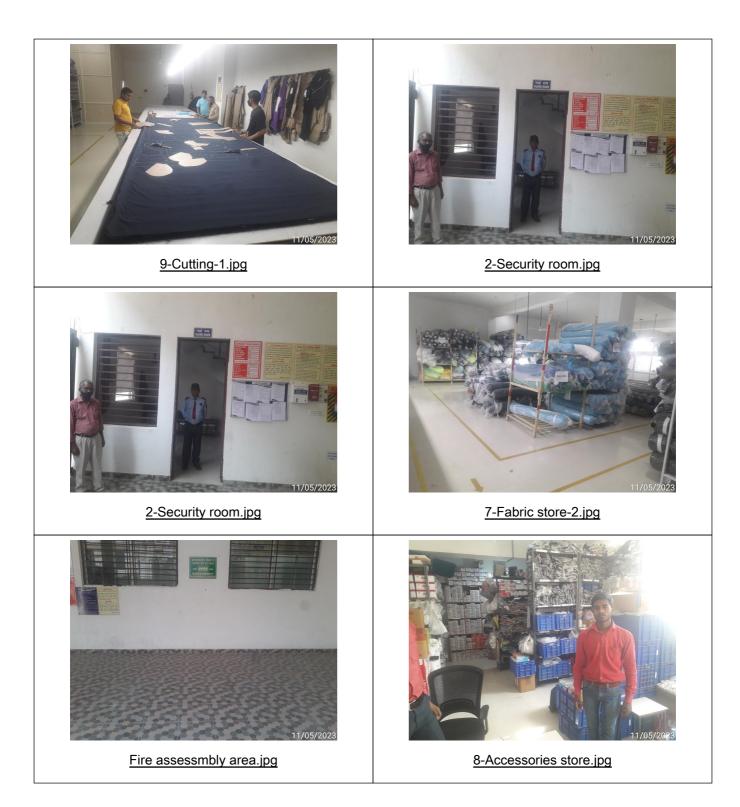




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Fire extinguisher and fire alarm.jpg



10-Stitching (production)-2.jpg

7-Fabric store-1.jpg



20-RO Plant.jpg



Electrical panels.jpg

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