



# Sedex Members Ethical Trade Audit Report

Version 6.0



**Audit Details**

Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1077648	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 92513458
Business name (Company name):	MIDWAY APPARELS INDIA PVT. LTD.,		
Site name:	MIDWAY APPARELS INDIA PVT. LTD.,		
Site address: <i>(Please include full address)</i>	No. 54/4 VSS GARDEN, SIDCO EAST CROSS ROAD, KANGEYAM MAIN ROAD, TIRUPUR 641 606	Country:	India
Site contact and job title:	Mr. P. Karthikeyan - HR Manager		
Site phone:	+91- 9626264402	Site e-mail:	gm@midway.in
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	28 <sup>th</sup> November 2018		

**Audit Company Name & Logo:**

**SGS India Private Limited**



**Report Owner (payee):**

**MIDWAY APPARELS INDIA PVT. LTD.,**

*(If paid for by the customer of the site please remove for Sedex upload)*

**Audit Conducted By**

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

## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.0 April 2017 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

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

Lead auditor: Md. Javithu Hussain

Team auditor: Arulkumar M

Interviewers: Md. Javithu Hussain

Report writer: Md. Javithu Hussain

Report reviewer: Sabina Pinto

Audit Company Report Reference: 4303560

Date of declaration: 05<sup>th</sup> December 2018

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

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

## Non-Compliance Table

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input checked="" type="checkbox"/>	<input type="checkbox"/>		01		<ul style="list-style-type: none"> <li>The factory has not communicated universal right policy to their relevant stake holders/suppliers.</li> </ul>
0B <a href="#">Management systems and code implementation</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				•
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				•
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				•
3. <a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04			<ul style="list-style-type: none"> <li>It was noted during the site tour, that 50% of overlock machines are found with tilted needle guards and 10% of overlock, button machines are found missing eye guards.</li> <li>It was noted during the site tour that, 01 out of 03 exit are installed with inward opening door at cutting section.</li> </ul>

									<ul style="list-style-type: none"> <li>• It was noted during the site tour that, 01 out of 03 Fire extinguishers in hostel are found discharged (Under pressure).</li> <li>• It was noted during document review; factory has not appointed fulltime boiler operator. However, visiting boiler operator has appointed and he will visit twice in a week.</li> </ul>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
5	<u>Living Wages and Benefits</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	01			<ul style="list-style-type: none"> <li>• It was noted during the document review factory has delayed remitting the social security benefits (ESI &amp; PF) payment from November 2017 to October 2018.</li> </ul>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				<ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				<ul style="list-style-type: none"> <li>•</li> <li>•</li> </ul>

9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				• •

General observations and summary of the site:

- Factory does not interfere with the workers' rights.
- There was no evidence of child labor in the factory.
- There was no evidence of forced/bonded/involuntary labour in the factory.
- In general, the working conditions at the facility was found good and well maintained.
- No discrimination was found on any grounds.
- Factory has not engaged any home workers.
- As confirmed by the employees during their interviews, there is no physical abuse or discipline, threat of physical abuse, sexual or other harassment and verbal abuse in the factory.
- Factory respects the legal minimum wages and all the workers are aware of their wages.
- Factory respects legal limits on working hours.
- Factory management was cooperative during the audit.

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



## Site Details

Site Details																																
A: Company Name:	MIDWAY APPARELS INDIA PVT. LTD.,																															
B: Site name:	MIDWAY APPARELS INDIA PVT. LTD.,																															
C: GPS location: (if available)	GPS Address:, No. 54/4 VSS GARDEN, SIDCO EAST CROSS ROAD, KANGEYAM MAIN ROAD, TIRUPUR 641 606	Latitude: 11.0903° N Longitude: 77.4145° E																														
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory licence number TP 15506 which was obtained for 500 Workers, 250 Horse Power, which found valid till 31/12/2019.																															
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	Manufacturer of all kinds of knitted garments.																															
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>The facility has operated in the existing location since 2004 with total land area of 62,162 sq. Feet and build up area of 52,795 sq. Feet. This facility is in Tirupur.</p> <table border="1"> <thead> <tr> <th>Production Building no: 1</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Fabric stores and cutting</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>First Floor</td> <td>Sewing and checking</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Second Floor</td> <td>Sampling and office</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Third Floor</td> <td>RO Plant</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Production building no: 2 - Ground Floor</td> <td>Ironing and Packing</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Building no: 3 - Ground Floor</td> <td>Canteen</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Building no: 4 - Ground Floor</td> <td>crèche and rest rooms</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Building no: 5 - Ground Floor</td> <td>Gents and ladies hostel</td> <td>Year of establishment: 2004</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>Nil</td> </tr> </tbody> </table>		Production Building no: 1	Description	Remark, if any	Ground Floor	Fabric stores and cutting	Year of establishment: 2004	First Floor	Sewing and checking	Year of establishment: 2004	Second Floor	Sampling and office	Year of establishment: 2004	Third Floor	RO Plant	Year of establishment: 2004	Production building no: 2 - Ground Floor	Ironing and Packing	Year of establishment: 2004	Building no: 3 - Ground Floor	Canteen	Year of establishment: 2004	Building no: 4 - Ground Floor	crèche and rest rooms	Year of establishment: 2004	Building no: 5 - Ground Floor	Gents and ladies hostel	Year of establishment: 2004	Is this a shared building?	No	Nil
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	<p>Visible structural integrity issues (large cracks) observed?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Please give details: N/A</p> <p>Does the site have a structural engineer evaluation?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please give details: The facility is evaluated by a competent engineer and certified.</p>
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent</p> <p><input checked="" type="checkbox"/> Factory Processing/Manufacturer</p> <p><input type="checkbox"/> Finished Product Supplier</p> <p><input type="checkbox"/> Grower</p> <p><input type="checkbox"/> Homeworker</p> <p><input type="checkbox"/> Labour Provider</p> <p><input type="checkbox"/> Pack House</p> <p><input type="checkbox"/> Primary Producer</p> <p><input type="checkbox"/> Service Provider</p> <p><input type="checkbox"/> Sub-Contractor</p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Nil</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>The main operations carried out in this premise are Cutting, Sewing, Checking and Packing.</p> <p>The main equipment's used by the factory are sewing machines, cutting machines and ironing table.</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name)</p> <p><input checked="" type="checkbox"/> Worker Committee</p> <p><input type="checkbox"/> Other (specify)</p> <p><input type="checkbox"/> None</p>
<p>K: Is there any night production work at the site?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If yes approx. % of workers in on site accommodation</p> <p>The facility has provided on site accommodation dormitories for 56% of their employees. The facility management provided Accommodation to Male and female employees separately away from Production Building, there are 15 room each in male and female dormitory and approximately 40 females and 65</p>

	males housing in the dormitory.
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
N: Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:45 am Day 1 Time out: 05:50 pm	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:
B: Number of auditor days used:	Two man days (2 Auditors x 1 day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 27.11.2018 to 10.12.2018 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. P. Karthikeyan - HR Manager		
H: Is further information available (If yes please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	NA		
J: Previous audit type:	NA		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input checked="" type="checkbox"/> N/A		

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

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

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	137	0	0	0	0	0	0	137
Worker numbers – female	68	0	0	0	0	0	0	68
Total	205	0	0	0	0	0	0	205
Number of Workers interviewed – male	17	0	0	0	0	0	0	17
Number of Workers interviewed – female	09	0	0	0	0	0	0	09
Total – interviewed sample size	26	0	0	0	0	0	0	26

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

	100 % monthly paid _____ % other If other, please give details
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Worker Interview Summary	
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	3 groups of 5 male employees 1 group of 5 female employees
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	Male: 02      Female: 04
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	None
I: What did the workers like the most about working at this site?	Regular work. Good working environment. They get their payment on time. They get all benefits like Employees Provident Fund, Holiday wages etc. No harassment or abuse. No discrimination.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Good
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>If yes, please give details:</i>	



**M: Attitude of workers:**

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

- No negative comments received from the workers against the management.
- No walk outs / strikes have taken place in the factory till date.
- Workers confirmed that the factory does not hire any child labour.
- It was observed that all the workers are freely working in the factory
- Workers are happy with the present work place facilities / conditions in the factory.
- Workers confirmed that overtime is voluntary and overtime is requested only on urgent business needs.
- They also confirmed that they receive wages on monthly basis on or before of 7<sup>th</sup> of every month.
- Workers are satisfied with the attitude of the management towards them.

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

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

Workers representatives attended opening and closing meeting. Further, they were positive about the audit. No negative feedback received from them.

**O: Attitude of managers:**

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

Managers were co-operative during the audit. Further, they were receptive to the observations during the audit and showed keen interest to improve the conditions.

## Audit Results by Clause

### 0A: Universal Rights covering UNGP

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

#### 0.A. Guidance for Observations

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

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

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

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

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

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

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

#### Current Systems and Evidence Examined

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

#### Current systems:

This facility maintains policy related to universal rights concern and the facility has appointed management person to implement and monitor Universal Rights covering UNGP this was confirmed through employee interview and the same was not communicated to their supply chain /stakeholders.

The facility maintains policies and procedures related to no child labour/child labour remediation plans, no forced labour, no harsh and inhuman treatment, no discrimination, health & safety, freedom of association, working hours, and the same was implemented and monitored effectively.

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

Details: Standing order, employee terms and conditions, Committee meeting records and company policies.

Any other comments: None

A: Policy statement that expresses commitment to

Yes

<p>respect human rights?</p>	<p><input type="checkbox"/> No Please give details (mainly applicable for the parent company): The facility has maintained the policy related to Universal rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: The facility has appointed designated person responsible for implementing standards of universal rights policy Name: Mr. Senniappan Job title: General Manager</p>
<p>C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility have provided suggestion / compliant box at strategic locations.</p>
<p>D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details: All employee information and personnel files are kept locked away in the human resources office and only viewed by the HR manager and his team.</p>
<p>E: 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  Please give details:</p>

Findings		
<p><b>Finding: Observation</b> <input checked="" type="checkbox"/>      <b>Company NC</b> <input type="checkbox"/></p> <p><b>Description of observation:</b></p> <p>The factory has not communicated universal right policy to their relevant stake holders/suppliers.</p> <p><b>Additional elements:</b></p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues. 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</p>		<p><b>Objective evidence observed:</b></p> <p>During document review</p>

<p><b>Comments:</b></p> <p>The factory shall communicate the universal right policy to their stake holders and other interested parties</p>	
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<p><b>Good examples observed:</b></p>	
<p>Description of Good Example (GE): None</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>

## Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year: 8 %	This year 10 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	10%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	Last year: 8 %	This year 10 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	8%	10%
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: As per records there are no accidents happened in twelve months.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	Last year: Nil Number: No work-related accidents and injuries took placed	This year: Nil Number: No work-related accidents and injuries took placed
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	No work-related accidents and injuries took placed	No work-related accidents and injuries took placed
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year: Nil	This year: Nil
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months 0 % workers 12 months 0 % workers	6 months 0 % workers 12 months 0 % workers
J: % of workers that work on average more than 60 total hours / week in the	6 months 0 % workers	6 months 0 % workers

last 6 / 12 months:	12 months 0 % workers	12 months 0 % workers
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**0B: Management system and Code Implementation**

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Various abstracts and ETI base code.

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

- Mr. Karthikeyan – HR Manager is responsible for compliance with the code.
- Factory has translated ETI Base code in local language and communicated to all the employees.
- Factory has displayed abstract of various National and Local laws.

Any other comments: None

**Management Systems:**

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: The facility not imposed with fine as per inspector of factories records.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: The facility has a policy regarding forced labour, child labour, discrimination, harassment &amp; abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Yes. All the Workers are given training and factory has displayed all the policies in a local language.</p>

<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: All the staff and workers are given training during induction itself and factory has displayed all the policies in notice boards.</p>
<p>E: 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  Please give details: The training records are kept in place.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits).  Please detail (Number and date).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  Please give details:</p>
<p>G: Is there a Human Resources manager/department?  If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: Mr. Karthikeyan – HR Manager</p>
<p>H: Is there a senior person /manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: Mr. Karthikeyan – HR Manager</p>
<p>I: Is there a policy to ensure all worker information is confidential</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: They have adequate software facility to keep all the workers detail confidential.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: They have adequate software facility to keep all the workers detail confidential.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details: The facility conducts periodic risk assessment to evaluate the effectiveness of policy and procedure and records are verified.</p>
<p>L: 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  Please give details: If any problems found at internal audit are brought to the attention of senior management and corrections made.</p>
<p>M: 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  Please give details: The site sends a copy of the relevant customer codes to its own suppliers.</p>



<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an occupied deed and permission for their occupied land.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the local law regulations they have done all the practices.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: As per the local law regulations they have done all the practices
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the legal requirement facility has done their job.
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the legal requirement facility has done their job.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: As per the legal requirement facility has done their job.

**Non-compliance:**

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

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

NC against Local Law

None observed during the audit

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

N/A

**Observation:**

**Description of observation:**

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

**Good Examples observed:**

Description of Good Example (GE):

**Objective evidence observed:**

**1: Freely Chosen Employment**

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

**ETI**

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Current Systems and Evidence Examined**

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

**Current systems:**

- Forced labour policy.
- Interaction with management staffs and employees.

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

- Workers interviews confirmed that they are not required to submit any original documents or any deposits with the employer. They also confirmed that they are working voluntarily in the factory.
- Workers interviews confirmed that they can leave their employer after reasonable notice of one month.
- At the time of audit, there was no evidence of forced, bonded or prison labour in the factory.

Any other comments: None

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

employment?	Please describe finding: There no restrictions on worker's freedom.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there is a published 'modern day slavery statement.	<input type="checkbox"/> Yes <input type="checkbox"/> No  Please describe finding:   <input checked="" type="checkbox"/> Not applicable
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: There is no restrictions on worker's freedom.
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No  If yes, please give details and category of workers affected:   <input checked="" type="checkbox"/> Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Facility has a practice like committee meetings, suggestion box, compliant box and they have displayed local labour inspector (Government authority) contact details to raise their concerns. Further they have forced labour policies.  Please describe finding:

**Non-compliance:**

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

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

None observed during the audit

**Local law and/or ETI requirement**

**Recommended corrective action:**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

N/A

**Observation:**

**Description of observation:**

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

**Good Examples observed:**

Description of Good Example (GE):

**Objective evidence observed:**

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

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Works committee meeting minutes and records.
- Policy on freedom of association and collective bargaining.

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

- No union or association is functioning in the factory.
- Workers interviews confirmed that workers have access to members at work place and management does not interfere in their rights.
- Factory has provided complaint box in place to drop the same by employees.
- Factory has formed Works Committee with elected worker representatives and conducts regular meetings once in a month and minutes are documented. Last meeting held on 25.10.2018 and same was confirmed during worker's interviews.

Any other comments: None

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

- Union (name)
- Worker Committee
- Other (specify)
- None

B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Compliant box and Prevention of anti-sexual harassment committee.  Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Adequate committee formation found.	
F: Name of union and union representative, if applicable:	NA: No unions present.	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes, worker's committee	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Date of last election: 14.06.2018
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 6	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Factory has formed Works Committee with elected worker representatives and conducts regular meetings once in a month and minutes are documented. The topics covered in the meeting are about general work place environment and needs of the workers. Last meeting held on 26.11.2018 and same was communicated through worker's representatives to workers and confirmed during workers interviews.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:                   None observed during the audit   <b>Local law and/or ETI requirement:</b>   <b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>                  (where relevant please add photo numbers)                   N/A</p>
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**Observation:**

<p><b>Description of observation:</b>   <b>Local law or ETI requirement:</b>   <b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>
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**Good Examples observed:**

<p>Description of Good Example (GE):</p>	<p><b>Objective evidence observed:</b></p>
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### 3: Working Conditions are Safe and Hygienic

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

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

#### ETI

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

#### Current Systems and Evidence Examined

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

#### Current systems:

- Factory license & dormitory license.
- Diesel generator permission letter from electrical inspectorate
- Fire license for factory and dormitory.
- H&S policy
- List of first aid box, fire extinguishers and training records of first aid and firefighting operations.
- Fire mock drill record for factory and dormitory.
- Drinking water portability test certificate.

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

- Factory has valid business licence to operate (license # TP 15506) and found valid till 31.12.2019.
- Factory has dormitory and valid licence for 250 employees (License N0 – 32/2- 2018) and found valid till 28.02.2021.
- Mr. Karthikeyan – HR Manager – is responsible for Health and Safety issues.
- Factory and dormitory was neat and clean and with adequate lighting arrangements as well as well ventilated.
- Emergency exits are identified, marked and shown graphically at all sections of the factory.
- Emergency lamps are provided at all sections of the factory.
- Factory has obtained Fire License from the local authority and License No: 988/2018 and valid till 19.05.2019 and for dormitory License No: 989/2018 and valid till 15.05.2019.
- Safety guards such as finger guards are provided in all the sewing machines.

- Fire evacuation drills were conducted regularly. Last drill was conducted for factory 08.10.2018 and dormitory was 14.10.2018.
- Factory has provided adequate fire extinguishers for this size of the factory.
- Drinking water is provided at all the sections of the factory and portability of water is tested and test reports are maintained.
- Adequate number of first aid boxes with prescribed contents is kept at the factory.
- Accidents / injuries record are maintained.
- Factory has provided adequate number of toilets for both male and female workers.

Any other comments: None

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: Facility has published in notice board.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please give details: Facility has not maintained worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  Please give details:</p>
<p>D: 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                  Please give details: H&amp;S instructions and PPE's are provided by the front office personnel during the entry.</p>
<p>E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of</p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: NA – Facility strength does not exceed 500</p>

rooms suitable for the number of workers.	
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: The facility has given first aid training to 23 employees through St. John's ambulance service on 16.06.2018.</p>
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: No transport</p>
H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: Facility has provided separate storage cupboard for all the workers.</p>
I: Are H&S Risk assessments conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: Health and safety risk assessment being done and the corrective actions recorded.</p>
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: All legal requirements legal obligations related environmental requirements were followed by the management.</p>
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Please give details: Personal Officer updates its customer requirements on environmental standards, and no banned chemicals were utilized.</p>

**Non-compliance:**

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

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

It was noted during the site tour, that 50% of overlock machines are found with filtered needle guards and 10% of overlock, button machines are found missing eye guards.

**Local law and/or ETI requirement**

In accordance with Factories Act 1948, Section 26 (1) (a), In all machinery driven by power and installed in any factory after the commencement of this Act [1948] - (a) every set screw, bolt or key on any revolving shaft, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger; (b) all spur, worm and other toothed or friction gearing which does not require frequent adjustment while in motion shall be completely encased, unless it is so situated as to be as safe as it would be if it were completely encased.

**Local law and/or ETI requirement**

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

**Recommended corrective action:**

It is recommended that; factory shall provide needle and eye guards in all the sewing machines and shall ensure the usage of the same on regular basis.

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

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

It was noted during the site tour that, 01 out of 03 exit are installed with inward opening door at cutting section.

**Local law and/or ETI requirement:**

In accordance with Tamil Nadu Factories Rules 1950, Chapter IV, Rule 61 (9): (u), exit doorways shall open outwards, that is away from the room but shall not obstruct the travel along any exit. No door when opened shall reduce the required width of stairway or landing to less than 90 centimetres. Overhead or sliding doors shall not be installed for this purpose.

**Local law and/or ETI requirement:**

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

**Objective evidence observed:**

*(where relevant please add photo numbers)*

During site tour

**Objective evidence observed:**

*(where relevant please add photo numbers)*

During site tour

steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

**Recommended corrective action:**

It is recommended that; factory shall provide all exit doors which opens in the direction of egress.

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

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

It was noted during the site tour that, 01 out of 03 Fire extinguishers in hostel are found discharged (Under pressure).

**Local law and/or ETI requirement:**

According to rule 61 (10) of Tamilnadu Factories Rules 1950, all the first aid fire fighting equipments shall be subjected to routine maintenances, inspection and testing to be carried out by properly trained persons

**Local law and/or ETI requirement:**

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

**Recommended corrective action:**

It is recommended that; factory shall ensure all fire extinguishers are calibrated regularly with sufficient pressure.

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

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

It was noted during document review; factory has not appointed fulltime boiler operator. However, visiting boiler operator has appointed and he will visit twice in a week.

**Local law and/or ETI requirement:**

In accordance with the boiler attendant's rules,2011. Chapter-II 4. Competent person shall possess certificate and extent of qualification.-  
No person who does not possess a certificate of competency as a boiler attendant under these rules shall be deemed a fit and proper person to hold charge of a boiler.

**Objective evidence observed:**

*(where relevant please add photo numbers)*

During site tour

**Objective evidence observed:**

*(where relevant please add photo numbers)*

During document review

<p><b>Local law and/or ETI requirement:</b></p> <p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p><b>Recommended corrective action:</b></p> <p>It is recommended that; factory shall appoint qualified full time boiler operator.</p>	
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Observation:	
<p><b>Description of observation:</b> None</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

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

**4: Child Labour Shall Not Be Used**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Recruitment policy
- Personnel files verification of sampled workers.

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

- Factory has displayed child labour prohibition policy in the premises.
- No child labour was found during audit at the factory. Also, no evidence of past employment of child labour was found at the factory.
- Factory had verified the age of the workers at the time of employment and collected age proof documents such as Doctor's certificates, Transfer certificate and Election Id, etc.
- Workers interviews confirmed that factory does not hire child labour.

Any other comments: None

A: Legal age of employment:	18
B: Age of youngest worker found:	19
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total	0 %

workers)	
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:</p> <p>None observation during the audit</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>N/A</p>
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**Observation:**

<p><b>Description of observation: None</b></p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>
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**Good Examples observed:**

<p>Description of Good Example (GE): None</p>	<p><b>Objective Evidence Observed:</b></p> <p>NA</p>
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**5: Living Wages are Paid**

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

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

**ETI**

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Pay roll record (October 2018, June 2018 and January 2018)
- ESI and PF challans and returns
- Employment order verification of sampled workers
- Wage slip
- Remuneration policy
- List of holidays (Form#: 5)

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

- Legal benefits like Provident Fund, Employee State Insurance are provided for all the employees.
- Factory issues wage slips with detailed break up in local language to all the workers.
- Workers interviews confirmed that factory has provided with written and understandable information about their employment conditions in respect of wages before they enter employment

Any other comments: None

**Non-compliance:**

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

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

It was noted during the document review factory has delayed remitting the social security benefits (ESI & PF) payment from November 2017 to October 2018.

**Local law and/or ETI requirement:**

In accordance with The Employees Provident Funds Scheme, 1952, Section 38 (1), the employer shall, before paying the member his wages in respect of any period or part of period for which contributions are payable, deduct the employee's contribution from his wages which together with his own contributions as well as an administrative charge of such percentage (of the pay (basic wages, dearness allowance, retaining allowance, if any, and cash value of food concession admissible thereon) for the time being payable to the employees other than an excluded employee, and in respect of which provident fund contributions are payable as the Central Government may fix, he shall within fifteen days of the close of every month pay the same to the Fund by separate bank drafts or cheques on account of contributions and administrative charge.

In accordance with Employee State Insurance Regulations, 1950- Section 31 Time for payment of contribution. — An employer who is liable to pay contributions in respect of any employee shall pay those contributions within 21 days of the last day of the calendar month in which the contributions fall due. Note - THE GAZETTE OF INDIA, JULY 1, 2017, EMPLOYEES' STATE INSURANCE CORPORATION, New Delhi, the 01/07 /2017

2. In Regulation 31, for the words within "21 days" as they Occur, the words within "15 days" shall be substituted.

3. They shall come into force with effect from the contribution payable for the month of June, 2017 i.e. by 15th July, 2017.

**Local law and/or ETI requirement:**

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.

**Recommended corrective action:**

It was recommended that factory shall remit the social security benefits (ESI & PF) payment on or before 15th of every month.

**Objective evidence observed:**

*(where relevant please add photo numbers)*

During the document review.

<b>Observation:</b>	
<b>Description of observation: None</b>  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>  Na

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

**Summary Information**

<b>Criteria</b>	<b>Local Law</b> <i>(Please state legal requirement)</i>	<b>Actual at the Site</b> <i>(Record site results against the law)</i>	<b>Is this part of a Collective Bargaining Agreement?</b>
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hours per day, 48 hours per week and 208 hours per month	8 hours per day, 48 hours per week and 208 hours per month	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours per day, 12 hours per week and 50 hours per quarter	2 hours per day, 6 hours per week and 22 hours per quarter	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
C: wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: Factory has to follow the Minimum wages of hosiery manufacturing with effect from 01.04.2018  Tailor, Cutter, Ironer, Packer: 282.92  Checker: 213.69 Helper: 190.61	Factory follows the Minimum wages of Hosiery industry with effect from 01.04.2018  <b>Per Day:</b> Tailor, Cutter, Ironer, Packer: 282.92  Checker: 213.69 Helper: 190.61	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A

D: overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum:  Double the normal rate of wages	Double the normal rate of wages as per policy.	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A
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**Wages analysis:**  
[\(Click here to return to Key Information\)](#)

A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If <b>No</b> , why not?	N/A
B: Sample Size Checked <i>(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)</i>	26 sample of worker's time and wage records were verified from October 2018, June 2018 and January 2018.
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please give details: Tailor, Cutter, Ironer, Packer: 282.92 Checker: 213.69 Helper: 190.61
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If <b>No</b> , please give details:
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Minimum Paid worker: 190.61 Maximum paid worker: 213.69
F: Please indicate the breakdown of workforce per earnings:	___% of workforce earning under min wage ___% of workforce earning min wage 100 % of workforce earning above min wage
F: Bonus scheme found: Please specify details:	Bonus Scheme found: The facility is paying 8.33% for all the workers and Legal minimum requirement is 8.33%. <i>Note: full time employees and please state hour / week / month etc.</i>
H: What deductions are required by law e.g. social insurance? Please state all types:	Employee Provident Fund (12%) and Employee State Insurance (1.75%)

I: Have these deductions been made? Please list all deductions that have/have not been made.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please list all deductions that <b>have</b> been made.	1. Employee Provident Fund 2. Employee State Insurance  Please describe:
		Please list all deductions that <b>have</b> not been made.	1.NA 2.  Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please give details: The production records matches the payroll record	
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Please specify amount/time: No defined living wages.	
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: No defined living wages.		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input type="checkbox"/> No	Please give details: No defined living wages. They are following the local government prescribed minimum wages to all categories of workers.	
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Please give details: Wage record were verified	

Q: How are workers paid:

- Cash – 20%
- Cheque
- Bank Transfer – 80%
- Other

If other, please explain:

**6: Working Hours are not Excessive**

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

**ETI**

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Working hours policy
- Time records (October 2018, June 2018 and January 2018)
- Interaction with management staff and employees

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

- Factory respects legal working hours of 8 hours per day and works in general shifts.
- In & out time of all workers is registered by Biometric system.
- Every Sunday is a holiday for all the workers.

- Workers interviews confirmed that overtime is voluntary.

Any other comments: None

**Non-compliance:**

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

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

None observed during the audit

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**  
(where relevant please add photo numbers)

N/A

**Observation:**

**Description of observation:** None

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

NA

**Good Examples observed:**

Description of Good Example (GE): None

**Objective Evidence Observed:**

NA



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

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please give details:  The facility has obtained overtime waiver from inspector of factories No. 1390/2018 Dt. 15.03.2018 Valid till 13.03.2019.
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours per day, 06 hours per week and 22 hours per month.	Less than 50 hours per quarter
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___5___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of <b>standard</b> wages: As per the policy it is 200%.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe 100% of workers & frequency: 7 <sup>th</sup> of every month

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input type="checkbox"/> No  <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)  <input type="checkbox"/> Collective Bargaining agreements  <input type="checkbox"/> Other         </p> <p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>N/A</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p> <input checked="" type="checkbox"/> <b>Overtime is voluntary</b>  <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week  <input type="checkbox"/> Safeguards are in place to protect worker's health and safety  <input type="checkbox"/> Site can demonstrate exceptional circumstances  <input type="checkbox"/> Other reasons (please specify)         </p> <p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>Overtime is voluntary</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p> <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No            If yes, please give details:         </p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No         </p>

**7: No Discrimination is Practiced**

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

**ETI**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- No discrimination policy.
- Sampled employees personal files

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

- No evidence of discrimination was found during record verification for employment, compensation, training or promotion.
- Workers interviews confirmed that they receive equal pay for equal work.

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 67 % Female: 33 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#:  NA – No women are working in skilled and technical roles.
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement  No evidence of discrimination found

**Professional Development**

A: What type of training and development are available for workers? All workers are given H&S training

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

Yes  
 No

If no, please give details:

**Non-compliance:**

<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>None observed during the audit</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>N/A</p>
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**Observation:**

<p><b>Description of observation:</b> None</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>
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Good Examples observed:	
Description of Good Example (GE): None	<b>Objective Evidence Observed:</b>  NA

**8: Regular Employment Is Provided**

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

**ETI**

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

**Additional Elements: Responsible Recruitment**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Employment order
- Time records
- Social security benefits records

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

- As confirmed by the workers during their interview, all the workers are working on regular basis.
- As confirmed by the workers during their interview, all the mandatory benefits like Provident Fund, Employee State Insurance, etc. are being provided to them.
- As confirmed by the workers during their interview, all the workers are provided with written and understandable information about their employment conditions in respect of wages before they enter employment.

Any other comments: None

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Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>None observed during the audit</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>N/A</p>

Observation:	
<p><b>Description of observation: None</b></p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p> <p>NA</p>

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

### Responsible Recruitment

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



of recruitment/placement?	If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – please give details
D: If any checked, give details:	None observation found during the audit

**Migrant Workers:**

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

A: Type of work undertaken by migrant workers:	No migrant workers found working in the factory on the day of audit. Hence not applicable.	
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used  No migrant workers found working in the factory on the day of audit. Hence not applicable.	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding:  Not applicable. – No migrant workers.	Observations  Not applicable. – No migrant workers.

<p>D: Are any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes number and example of roles:</p> <p>No migrant workers found working in the factory on the day of audit. Hence not applicable.</p>
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### NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	<p>No agency found working in the factory on the day of audit. Hence not applicable.</p> <p>Names if available:</p>
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No <p>No agency found working in the factory on the day of audit. Hence</p>

	not applicable.
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No  No agency found working in the factory on the day of audit. Hence not applicable.
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: No agency found working in the factory on the day of audit. Hence not applicable.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: No agency found working in the factory on the day of audit. Hence not applicable.

**Contractors:**

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

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

8A: Sub-Contracting and Homeworking:

**8A: Sub-Contracting and Homeworking**

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

8A.1 There should be no sub-contracting unless previously agreed with the main client.  
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.  
*Note to auditor on homeworking:*  
 Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.  
*Note to auditor on subcontracting:* auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

**Current Systems and Evidence Examined**

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

**Current systems:**

- Production records
- List of suppliers

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

- Factory has engaged two subcontractors for printing and Embroidery.
- No home worker engaged by the factory

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

Process Subcontracted	Printing and Embroidery	Printing
Name of factory	Midway Apparels India Pvt Ltd	Geekay Printing Mills
Address	SF No. 312, Cheran Nagar, Chennimalaipalyam, Kangeyam road, Tirupur -638 752	1/110A, Sedarpalayam, Uthukuli (RS), Tirupur – 638 752.

**Non-compliance:**

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

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

- NC against Local Law

None observed during the audit

**Objective evidence observed:**  
 (where relevant please add photo numbers)

N/A

**Local law and/or ETI /Additional Elements requirement:**

**Recommended corrective action:**

**Observation:**

**Description of observation:**

**Local law or ETI/Additional elements requirement:**

**Comments:**

**Objective evidence observed:**

**Good Examples observed:**

Description of Good Example (GE):

**Objective Evidence Observed:**

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

Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting

- Yes  
 No

Please describe: The auditor made a simple calculation based on the production capacity and output carried out.

B: If sub-contractors are used, is there evidence this has been

- Yes  
 No

agreed with the main client?	If <b>Yes</b> , summarise details:
C: Number of sub-contractors/agents used:	Two
D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , summarise details: The policy is well communicated with sub-contractor and displayed in notice board
E: What checks are in place to ensure no child labour is being used and work is safe?	The facility checks through regular site visit.

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

**9: No Harsh or Inhumane Treatment is Allowed**

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

**ETI**

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&amp;S or any other grievances to a 3<sup>rd</sup> party?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  Please give details: There is suggestion box, and an internal confidential phone numbers for reporting grievances.</p>
<p>B: If <b>Yes</b>, are workers aware of these channels and have access? Please give details.</p>	<p>Yes. All workers are aware of these processes; suggestion box is known by 100% of workers.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Compliant issues are discussed at senior management level and investigated.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers  <input type="checkbox"/> Communities  <input type="checkbox"/> Suppliers  <input type="checkbox"/> Other                  Please give Details: Compliant box.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g., suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. help lines or whistle blowing mechanism)</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If no, please give details: This matter is not discussed with the site's business partners</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If no, please explain</p>

<p>H: If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No                  If no, please give details</p>
<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No                  If yes, please give details</p>

**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:**

- Anti-harassment policy
- Sexual harassment prevention committee meeting records

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

- No evidence found for harsh or inhumane treatment in the factory.
- Factory has formed Sexual Harassment Prevention Committee, which meets once in two month. This was confirmed during workers interviews.
- Workers interviews confirmed that they are treated well in the factory and there is no harsh & inhumane treatment in the factor
- Factory has engaged external NGO Athmasugam welfare trust in Sexual harassment prevention committee.

Any other comments: None



**Non-compliance:**

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

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

None observed during the audit

**Local law and/or ETI requirement:**

**Recommended corrective action:**

**Objective evidence observed:**  
(where relevant please add photo numbers)

N/A

**Observation:**

**Description of observation:**

**Local law or ETI requirement:**

**Comments:**

**Objective evidence observed:**

**Good Examples observed:**

Description of Good Example (GE):

**Objective Evidence Observed:**

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

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

**Additional Elements**

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Recruitment policy
- Personal files verification of sampled workers

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

- All workers working in the factory found to be Indian Nationals and they have rights to work anywhere in India. Same was confirmed in management and worker's interviews

Any other comments: None

**Non-compliance:**

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

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

None observed during the audit

**Local law and/or ETI /Additional Elements requirement:**

**Recommended corrective action:**

**Objective evidence observed:**

*(where relevant please add photo numbers)*

N/A

Observation:	
<b>Description of observation: None</b> <b>Local law or ETI/Additional Elements requirement:</b> <b>Comments:</b>	<b>Objective evidence observed:</b>

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

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

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current systems:**

- Air quality and Noise level test certificates
- Environment Policy
- Documents of generator Sets

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

- Factory has conducted air quality test, noise, illumination monitoring test from En protech engineers on 23.02.2018.
- As per Tamilnadu pollution control board notification the factory comes under WHITE category, hence pollution consent is not applicable.
- Stack Emission test of installed Diesel Generator was conducted by Excellence laboratory on 23.02.2018.

Any other comments: None

**Non-compliance:**

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

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

None observed during the audit.

**Local law and/or ETI/Additional Elements requirement:**

**Recommended corrective action:**

**Objective evidence observed:**  
 (where relevant please add photo numbers)

N/A

**Observation:**

**Description of observation:** None

**Local law or ETI/additional elements requirement:**

**Comments:**

**Objective evidence observed:**

**Good examples observed:**

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

**Objective Evidence Observed:**







## Photo Form










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








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

Save As jpeg (this provides compression to make the file smaller).

- 6) Please delete this text once complete.

		
Name Board of the facility	Front view of the facility	Safe assembly area
		
DG room	Policy posters in the notice Board	Aisle marked

 <p>28/11/2018 10:32</p>		 <p>28/11/2018 10:49</p>
<p>Finishing &amp; Checking section</p>	<p>Pressing section</p>	<p>Dining hall</p>
 <p>28/11/2018 10:39</p>	 <p>28/11/2018 10:31</p>	 <p>28/11/2018 10:30</p>
<p>First aid kit</p>	<p>Fire extinguisher marked</p>	<p>Fire alarm call point</p>
 <p>28/11/2018 10:45</p>	 <p>28/11/2018 10:46</p>	 <p>28/11/2018 10:44</p>
<p>Suggestion Box</p>	<p>Toilet area</p>	<p>Cutting section</p>

		
<p>Hostel Building</p>	<p>Wash room in Hostel</p>	<p>Evacuation plot plan posted</p>
		
<p>Exit door opening inward in cutting section</p>	<p>Fire extinguishers under charged</p>	<p>missing eye guard in overlock machine</p>
		
<p>Needle guard tilted</p>		





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

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

**[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)**

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**[Click here for Supplier \(B\) members:](#)**

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

**[Click here for Auditors:](#)**

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