



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 1045116	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 293047499	
Business name (Company name):	Rajshree Polypack Ltd.			
Site name:	Rajshree Polypack Ltd.			
Site address: <i>(Please include full address)</i>	Plot No. 370/2(2) & 370/2(30, Near PSL, Vapi Road, Kachigam, Daman – 396 210	Country:	India	
Site contact and job title:	Mr. Rajashekharan Nair / H R Manager			
Site phone:	91- 7046104488	Site e-mail:	Rajashekharan.nair@formpack.co.in	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	30 - 31 January 2023			

<p>• Audit Company Name & Logo:</p>	<p>• Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>Rajshree Polypack Ltd.</p>
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• Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Vanita Arya APSCA number: RA 21704203

Lead auditor APSCA status: In good standing

Team auditor: N/A APSCA number: N/A

Interviewers: Vanita Arya APSCA number: RA 21704203

Report writer: Vanita Arya

Report reviewer: Sneha Jaiswar

Date of declaration: 31-01-2023

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

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

Summary of Findings

Issue <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 Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No concerns observed
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No concerns observed
3. Safety and Hygienic Conditions	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1	0	1	<p>Non-Compliances:</p> <ul style="list-style-type: none"> Some of the Exit doors observed to be opening inwards. <p>Good Examples:</p> <ul style="list-style-type: none"> The facility has provided Medical Room for employees, though there is no legal requirement as per their current manpower strength.
4. Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No concerns observed
5. Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No concerns observed
6. Working Hours	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No concerns observed

7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
8A	<u>Sub-Contracting and Homeworking</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
10A	<u>Entitlement to Work</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
10B2	<u>Environment 2-Pillar</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No concerns observed
10B4	<u>Environment 4-Pillar</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable
10C	<u>Business Ethics</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable

General observations and summary of the site:

Rajshree Polypack Ltd. is a public limited company located in the Union territory of Daman, Gujarat. The facility was established in the year 2013. The facility operates from owned premises. Total plot area is 11022 square meters and constructed area is 9434 square meters. The facility is into manufacturing of plastic rigid sheets and Thermoformed products. Total number of employees are 228. 95 employees are in Staff / Management category and 123 are in production, all hired directly by the facility. 10 Security personnel are supplied through Central Investigation Security Service.

This 2-pillar audit was performed over 2 days by 1 auditor and included interviews and record inspection of 26 employees. 26 workers – 24 males and 02 females were interviewed. They had a favourable attitude towards the company. They enjoyed their work and stated that it was a friendly environment. They felt comfortable in approaching the Management with any concerns they had, though there was none. Wages were paid as per the minimum wage notification issued by the Government and was paid on or before 7th of every month. The facility was quite organized, and well maintained. All records were maintained well and were made available as and when required.

Non-compliances observed during the audit have been included in the respective section in the report.

**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:	Rajshree Polypack Ltd. Unit 2																															
B: Site name:	Rajshree Polypack Ltd. Unit 2																															
C: GPS location: (If available)	GPS Address: Plot No. 370/2(2) & 370/2(30, Near PSL, Vapi Road, Kachigam, Daman – 396 210	Latitude: 20.3758N Longitude: 72.9014E																														
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 #: 3400, valid till 31/12/2024 for 300 employees and 2450 HP. GST#: 26AAFCR5189M1ZP																															
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of plastic rigid sheets and Thermoformed products.																															
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<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>Extrusion, Thermoforming and Dispatch</td> <td>N/A</td> </tr> <tr> <td>Mezzanine Floor</td> <td>HR Office, Conference Room and QC</td> <td>N/A</td> </tr> <tr> <td>1st Floor</td> <td>Printing, Sleeving and Grinding</td> <td>N/A</td> </tr> <tr> <td>2nd Floor</td> <td>Engineering Store, Finished Goods Storage</td> <td>N/A</td> </tr> <tr> <th>Production Building no 2</th> <td></td> <td></td> </tr> <tr> <td>Ground Floor</td> <td>Extrusion, Thermoforming and Dispatch</td> <td>Ground Floor</td> </tr> <tr> <td>Mezzanine Floor</td> <td>Office area, Conference Room and QC</td> <td>Mezzanine Floor</td> </tr> <tr> <td>1st Floor</td> <td>RM and FG Store</td> <td>1st Floor</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>None</td> </tr> </tbody> </table> <p>Rajshree Polypack Ltd. is a private limited company located in Plot No. 370/2(2) & 370/2(30, Near PSL, Vapi Road, Kachigam, Daman – 396 210. The facility operates from the current location since 2013. Facility operates in 2</p>		Production Building no 1	Description	Remark, if any	Ground Floor	Extrusion, Thermoforming and Dispatch	N/A	Mezzanine Floor	HR Office, Conference Room and QC	N/A	1st Floor	Printing, Sleeving and Grinding	N/A	2nd Floor	Engineering Store, Finished Goods Storage	N/A	Production Building no 2			Ground Floor	Extrusion, Thermoforming and Dispatch	Ground Floor	Mezzanine Floor	Office area, Conference Room and QC	Mezzanine Floor	1st Floor	RM and FG Store	1st Floor	Is this a shared building?	No	None
Production Building no 1	Description	Remark, if any																														
Ground Floor	Extrusion, Thermoforming and Dispatch	N/A																														
Mezzanine Floor	HR Office, Conference Room and QC	N/A																														
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2nd Floor	Engineering Store, Finished Goods Storage	N/A																														
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1st Floor	RM and FG Store	1st Floor																														
Is this a shared building?	No	None																														

	<p>Buildings. Building and floor wise details are mentioned in the table provided above.</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No structural integrity issue / cracks observed in the building</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Stability Certificate details: 1. For Building No.1: Dated 20/12/2018 issued by Mahalaxmi & Associates, 2. For Building No. 2: Dated 01/03/2021 issued by Concept Designers & Eng. Consultants. Both the Certificates are valid for 5 years from the date of issue.</p>
<p>G: Site function:</p>	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
<p>H: Month(s) of peak season: (if applicable)</p>	<p>No peak season reported. Production remains consistent throughout the year.</p>
<p>I: Process overview: <i>(Include products being produced, main operations, number of production lines, main equipment used)</i></p>	<p>Products: Plastic rigid sheets, Plastic rigid sheet compostable, Thermoformed & Injection Moulded plastic articles of various shapes and sizes (plain & decorated)</p> <p>Compostable thermoform and Injection moulded plastic articles of various shapes and sizes (plain & decorated). All the products thickness is above 75 microns only.</p> <p>There are 4 production Lines.</p> <p>Main equipment used are: 3 Extrusion Machines, 6 Thermoforming machines, 4 printing machines and 1 Sleeving machine.</p>
<p>J: What form of worker representation / union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify: <input type="checkbox"/> None

K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details: no accommodation provided and same is not mandated by the law.

• Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10:00 A2: Day 1 Time out: 18:00	A3: Day 2 Time in: 10:00 A4: Day 2 Time out: 17:15	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	2 days (1 auditor on 2 days)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Rajashekharan Nair / H R Manager		
H: Is further information available	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

(If yes, please contact audit company for details)	
I: Previous audit date:	14 – 15 January 2022
J: Previous audit type:	Initial
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No Union established in the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			•	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	122	0	10	0	0	0	0	132
Worker numbers – female	1	0	0	0	0	0	0	1
Total	123	0	10	0	0	0	0	133
Number of Workers interviewed – male	24	0	1	0	0	0	0	25
Number of Workers interviewed – female	1	0	0	0	0	0	0	1
Total – interviewed sample size	25	0	1	0	0	0	0	26



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



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5 each	
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 5	D2: Female: 1
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?	Working hours, stress free working environment and on time wage payment.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Positive	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>		

A total of 26 employees were selected for interviews, which included 25 employees from production and 1 Security guard. All the interviews, individual as well as in groups, were conducted privately without management presence, workers stated that they were aware of their working hours and overtime was purely on a voluntary basis. Further it was also noted that no overtime was conducted in the sampled months.

Employees were paid wages on a monthly basis. Payment is disbursed on or before 7th of every month. All interviewed employees reported that they are covered under mandatory social benefits such as Provident fund. This was further verified with the provided payment receipts.

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

2 Worker's Committee representatives were interviewed. The representatives were comfortable with the working conditions and management support and stated they could give suggestions freely to the facility management. The management has a collaborative approach with them and any suggestions for improvements from them are taken positively. They stated that the representatives from workers are elected by the workers themselves.

O: Attitude of managers:
(Include attitude to audit, and audit process. Both positive and negative information should be included)

Managers exhibited a very friendly attitude to workers. They were highly cooperative during the audit. The management remained transparent during audit process. The management intent was positive and were receptive to the non-compliances raised.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

• Current Systems and Evidence Examined

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

Current systems:

- The facility has drafted separate social policies for each salient issue where human rights impacts are covered and the same is communicated to all employees.
- The social policies are communicated throughout their supply chain including suppliers and sourcing agents.
- The facility has measured their direct, indirect and potential impacts on stakeholders i.e., suppliers (right holders) human rights through assessments/internal audits.
- The facility has a dedicated person who is responsible for implementing standards concerning human rights.

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

Details:

- Human Rights Policy and Procedures.
- Interaction with management and employees

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Human Rights policy states that the company respects and embraces diversity and expects its employees, suppliers and Business Heads to do the same.</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: Name: Mr. Rajashekharan Nair Job title: H R Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility has provided following grievance mechanism for confidential reporting without fear of retaliation any breaches of policies and procedures: 1. Various Workers Committees like Works, ICC and Grievance. 2. Suggestion Box / Complaint Box 3. Open Door Policy</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</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</p> <p>E1: Please give details: Facility has a Data Privacy Policy, which is followed. All Worker related information is collected by the HR department and they are maintained by the HR team. Rights are reserved with HR Department only.</p>
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Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation:</p> <p>No concerns observed on the day of audit.</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

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

Measuring Workplace Impact

Workplace Impact		
<p>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)</p>	<p>A1: Last year: __10__ %</p>	<p>A2: This year __09__ %</p>
<p>B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]</p>	09%	
<p>C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year</p>	<p>C1: Last year: __20__ %</p>	<p>C2: This year __20__ %</p>
<p>D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month</p>	22%	

E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident were recorded in government prescribed form. No major accident reported in last 12 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]	F1: Last year: Number: Nil	F2: This year: Number: Nil
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]	Nil	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: Nil	H2: This year: Nil
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0___% workers	I2: 12 months ___0___% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers

0B: Management system and Code Implementation

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

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

• Current Systems and Evidence Examined

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

Current systems:

- Mr. Rajashekharan Nair - H R Manager is responsible for implementation of all the social compliance activities in the facility.
- Facility management has communicated the ETI base code requirements to the employees.
- The facility has communicated the code to their suppliers and all its business associates.
- Facility has well drafted policies and procedures like child labour, H&S safety, Freedom of Association Grievance Handling, Working Hours & Overtime, equal remuneration, Disciplinary

practices. The organization has defined system to implement and maintain compliance with respect to social requirements and several policies are framed and communicated to the workers. Appointment of Management Representative and selection of workers representative is done through the workers to ensure proper communication and implementation. Facility has provided training to workers on H&S e.g fire safety, PPE, etc. and the workers are able to demonstrate their understanding on the same.

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

Details:

- Facility Policy and Procedures
- Review of Legal permits and Licenses.
- Interaction with Management and Interview with employees.

Any other comments:

None

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The factory has not been subject to any fines in last 12 months
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has defined policies in relation to Child Labour, Discrimination, Forced Labour and Harassment & Abuse and implemented relevant procedures.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies and procedure are displayed at facility notice board. Further, from audit process no deviations in regard to policy and procedure implementation was observed.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The facility provides training to employees and managers on ETI base code and facility code of conduct to all employees. Last Training on ETI Base Code was conducted on 02/12/2022.

<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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: The facility has maintained training records evaluation and feedback form for all trainings imparted to employees.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: BRCGS – Certificate No. IN19/818843442. Issue date – 22/02/2022, valid till 04/03/2023</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 G1: Please give details: HR Department consists of 4 personnel. H R Manager Mr. Rajashekharan Nair heads the department assisted by 3 staff members.</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 H1: Please give details: Mr. Rajashekharan Nair - H R 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 I1: Please give details: The facility has a data privacy policy to ensure all worker information remain 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 J1: Please give details: The facility has a procedure to ensure that confidential information remain confidential and is shared on need basis only.</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The facility has conducted a risk assessment to assess effectiveness of policies and procedures.</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 L1 Please give details: The facility has a process to address issues found when conducting risk assessments during periodic management meetings.</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 M1: Please give details:</p>

	The facility had communicated the ETI code to its own suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has maintained all documents towards ownership of land and building.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The site has a separate legal department in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility has adopted legally mandatory process of publishing interest of purchase in local newspapers with request to raise concerns if any to land buyers.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The facility did compensate the lessor for the land prior to the facility being built or expanded. Sales Deed was available.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: It was considered before finalising the acquisition.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No S1: Please give details: Facility has all legal documents and land use is in line with registered purpose as per documents issued by concerned authorities.

Non-compliance:

<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code:</p> <p>No concerns observed on the day of audit.</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p>Description of observation: None</p> <p>Local law or ETI requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good Examples observed:	
<p>Description of Good Example (GE): N/A</p>	<p>Objective evidence observed:</p>

1: Freely Chosen Employment <i>(Click here to return to summary of findings)</i>
<p>ETI</p> <p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.</p>

<ul style="list-style-type: none"> Current Systems and Evidence Examined <p><i>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.</i></p>
<p>Current systems:</p> <ul style="list-style-type: none"> The Facility does not have any signs of forced labour, bonded or involuntary labour, sub-contracting or prison labour. During the assessment, interviewed employees did not disclose any concerns regarding forced labour in the facility. According to them, they are working in the facility at their own will and that they may quit their jobs when they need to.

- No deposits upon hire were reportedly made. Only copies of the required documents were reportedly kept by management. This was also confirmed during the review of documents.
- No compulsory quota is implemented in the facility. After the regular work shift, the employees are allowed to leave the facility.
- Overtime work was reported to be rendered on a voluntary basis.
- Water breaks and toilet breaks may be taken by employees anytime of the day.

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

Details:

- Personal Files
- Resignation Records
- Appointment Letters issued to Company employees and Contract workers
- Employee & Management Interviews

Any other comments: N/A

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Employees are free to terminate employment by giving one month notice.</p>
<p>E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: The facility is based in India.</p>
<p>F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Employees are free to leave the site after completion of work day.</p>
<p>G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: The facility has evaluated risks and accordingly communicated policy on forced/trafficked/bonded labour to supply chain for implementation.</p>

H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The facility communicates forced/trafficked labour policy to supply chain and same policy is implemented at own site.
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Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: No concerns observed on the day of audit. Local law and/or ETI requirement Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

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

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

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

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

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

ETI

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

• Current Systems and Evidence Examined

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

Current systems:

- The facility encourages and respects all employees' rights to join union freely.
- The facility recognizes and encourages the right to freedom of association and collective bargaining under the law provisions.
- The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference.
- The facility has formed Works committee which consists of 08 members (04 from management and 04 from workmen). Meetings are held quarterly. Last 2 meetings were conducted on 27/08/2022 and 23/11/2022.
- The facility has posted suggestion box at accessible location where employees can share their concerns anonymously.
- There was no evidence of suppression of employees' rights.

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

Details:

- Minutes of the works committee meeting
- Site policy on freedom of association
- Interview with workers
- Interview with worker's committee member
- Interview with managers

Any other comments: Nil

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. If the number of employees is 100 & more. <input type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has formed Grievance Committee, Health and Safety Committee and ICC Committee as an effective worker communication channel. Facility has also provided suggestion box / complaints box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem. D2: 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 E1: Please give details: Based on the employee's interaction, it was observed that, Works committee and workers representatives are free to carry out their functions and meetings on periodic basis and the records for the same were maintained.	
F: Name of union and union representative, if applicable:	No Union exists in the facility	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Works Committee has been constituted.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All interviewed workers were aware of who their Representatives are.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 01/02/2021
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 Yes , please state how many: 02 worker representative were interviewed.	
L: Please describe any evidence that union/worker's committee is effective?	Last meeting of the Works Committee was conducted on 23/11/2022. Topics discussed during this meeting were:	

Specify date of last meeting; topics covered; how minutes were communicated etc.	Provision of additional lockers for workers as per the increased requirement.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: <u> 0 </u> % workers covered by Union CBA	M2: <u> 0 </u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A as there is no Union at the facility.	

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No concerns observed on the day of audit.</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p>

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

• Current Systems and Evidence Examined

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

Current systems:

General Health & Safety

1. Mr. Prolay Paul – Assistant Manager HR is responsible for Health and Safety.
2. Facility has provided total 11 toilets – 2 for females and 9 for males and 10 urinals.
3. Toilets were maintained neat and clean and this complies with legal requirement.
4. Facility was well ventilated and the facility area was kept clean both inside and outside.
5. Facility has provided 05 well equipped first aid boxes.
6. First aid training is provided to 21 employees through the authorised Industrial Health Training Agency “Samvedna Multi Speciality”. Training was conducted on 30/11/2022, which is valid for 1 year.
7. Drinking water test is conducted once a year. Last test was conducted on 14/12/2022 by Gujarat Laboratory.
8. Facility has provided 4 drinking water points across all floors and in canteen.
9. The facility conducted medical examination of all employees yearly. Last medical test was conducted on 03/12/2022.
10. Facility provides trainings on health and safety to employees on the following topics: General Health & safety, PPE & its usage, GMP, Personal Hygiene. These trainings are conducted quarterly.

Fire Safety:

1. Fire NOC # 35/02/IND/2022-23/DMNFES/46 dated 02/05/2022 valid for 1 year from the date of issue. This NOC was issued by Assistant Director – Fire & Emergency Services, DNH and DD, Daman.
2. Facility has provided 82 fire extinguishers, 10 fire alarm call points, 1 Fire Alarm panel, 1 Main Siren, 7 Hooters, 1 Fire Hydrant system, 22 Fire Hose pipes, 11 Hose Boxes, 14 emergency lights, 126 Smoke Detectors, 10 Fire Sand Buckets, 40 Sprinklers.
3. Inspection of fire equipment is conducted on a monthly basis by the internal Maintenance Team. Last inspection was conducted on 04/01/2023.
4. Fire Fighting training is conducted yearly. Last Training was conducted by SISS Academy for Skill Human Development Pvt. Ltd. on 29/11/2022 for 25 employees.

5. Mock drills are conducted once in 3 months. Last 2 drills were conducted on 25/08/2022 and 20/10/2022.
6. Health & Safety Committee has been formed with 8 members – 4 each from Staff/ Management and workers. Meetings will be held every quarter. Last 2 meetings were held on 18/10/2022 and 25/01/2023.
7. Evacuation diagrams were posted in all areas.

Electrical safety

1. All electrical equipment was maintained in good conditions such as sockets, plugs, switches and main fuse boards. Rubber mats were provided below electrical panels and distribution boards.
2. The facility has an in-house electrician team of 3 qualified electricians for general electrical maintenance.

Chemical safety

1. Facility uses inks, machine oil and transformer Oil. All chemicals were correctly labelled and secondary containment provided.
2. Material Safety Data Sheets were available and there were hazard marking on the chemicals which needed careful handling.
3. Employees handling chemicals confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.
4. Regular PPE safety and chemical handling and storage Trainings were provided to employees handling chemicals. The last training provided to 06 employees dated on 08/08/2022 on chemical handling.

Machine safety

1. All machines are provided with safety guards.
2. Internal Maintenance Team consisting of electricians conduct monthly preventive maintenance.

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

Details:

- Building Plant Layout – Ref No. 15/PDA/DMN/CP1307/2(2)/207/2018/105 dated 13/07/2020, approved by Member Secretary – Planning & Development Authority, Daman.
- Building Stability Certificate
- Fire- fighting Training records.
- Mock drill training records
- Drinking water Potability test
- First aid training records & Certificates
- Health and Safety Committee minutes of meeting
- Fire "No Objection Certificate",
- Medical examination Report.
- Hazard Identification risk assessment as per HIRA guidelines
- Health and safety training records.

Any other comments:

N/A

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose

- Yes
 No

B1: Please give details:

and are these communicated to workers?	The facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and communicated to workers during induction training.
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The facility had included the social compliance policies in employee handbook.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: No structural additions were observed as noted during documents reviews.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Visitors are explained of PPE requirements to enter the production floor.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Though there is no legal requirement of a medical room for the facility owing to its number of employees, the facility has provided the First Aid Room for the employees.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: There are 21 trained First Aiders across all shifts. Further, the facility has a tie-up with the nearby hospital Hansa Clinic for any medical emergencies.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Not applicable. No transportation was provided for workers by the factory and same is not mandated by the law.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: N/A. No dormitory or living space was provided for workers by the factory and same is not mandated by the law.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility risk assessment includes risk related to work on additional hours.
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 K1: Please give details: It was noted from review of records that facility has obtained Air and Water Pollution consent from pollution department, which is valid till 28/02/2024

<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>K1: Please give details: Based on the interaction with the facility management and chemical list and facility tour, it was noted that they do not use any banned chemicals.</p>
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>The main exit doors of the production areas on the Ground, 1st and 2nd floors (1 out of 2 on each floor), observed to be opening inwards and not in the direction of travel. Around 40 to 45 people work on ground and first floor and 5-7 employees (finished goods store) on second floor.</p> <p>Local law and/or ETI requirement Goa, Daman & Diu Factories Rules (1985), Rule 73(10)(t) Exit doorways shall open outwards, that is way 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.</p> <p>Recommended corrective action: All exit doors shall open outwards i.e., in the direction of travel.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Facility Walkthrough</p> <p>Photo # H & S NC 1 – Exit door opening inwards</p>

Observation:	
<p>Description of observation: None</p> <p>Local law or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed:</p>

Good Examples observed:	
<p>Description of Good Example (GE):</p> <p>1. The facility has provided Medical Room for employees, though there is no legal requirement as per their current manpower strength.</p>	<p>Objective Evidence Observed:</p> <p>Facility Walkthrough</p> <p>Workers Interview</p> <p>Management Interaction</p>

4: Child Labour Shall Not Be Used

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

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

ETI

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

• Current Systems and Evidence Examined

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

Current systems:

1. The facility has established a child labour policy and the board displaying child Labour policy in local language is posted at the main gate of the facility, which states that "No Child labour allowed in the factory".
2. There was no evidence of child labour or young labour observed based on the physical appearance of employees, nor reported during worker's interview.
3. The facility has maintained valid age proof records of employees in their personal files, as evidenced during the review of 26 sampled employees' file.
4. The youngest employee was found to be of 20 years (DOB: 03/04/2023; DOJ: 05/11/2022).

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

Details:

- Facility hiring policy
- Anti-child labour policy
- Review of Age proof records- Aadhar card, Pan card and school leaving certificates
- Review of Personnel files

Any other comments: None

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

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details N/A. No workers employed under 18.</p>
---	---

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No concerns observed on the day of audit. Local law and/or ETI requirement Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

• Current Systems and Evidence Examined

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

Current systems:

- All workers' wages were calculated at a daily rate. The minimum wage paid by the factory was 11,180/- per month according to the wage records, which was higher than the legal minimum wage.
- All workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time that they were paid.
- As per document review of payrolls and employee wage records, it showed that all the workers were provided with social insurance.
- Benefits of paid, annual leave, were given to all workers and maternity leave was given to appropriate workers. All social insurance payments were passed on to the relevant authorities in a timely manner.
- All workers were paid on or before 7th of each month by bank transfers and each worker was given a pay slip a day before the wage disbursement.

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

Details:

- Document review
- Worker interview
- Local and national laws
- Wages and benefits policy
- Local legal minimum wage documents
- Payroll records from January 2022 to December 2022.
- Leave records
- Social insurance and payment receipts
- Labour contracts for all employees (to examine agreed wage rates)
- Resignation records

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>No concerns observed on the day of audit.</p> <p>Local law and/or ETI requirement</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

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

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

Summary Information

• Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
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 and 48 Hours per week	A1: 8 hours per day and 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hours /day, 12 hours / week and 50 hours / quarter	B1: No overtime observed	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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: INR 44.41 / hour	C1: INR 53.75 / hour	C2: <input type="checkbox"/> Yes

	INR 355.30 / day INR 2131.80 / week INR 9,237.80 / month	INR 430.00 / day INR 2580.00 / week INR 11,180/ month	<input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 200% of ordinary rate of wages	D1: 200% of ordinary rate of wages. However, no overtime observed in the sample months.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

• Wages analysis: (Click here to return to Key Information)	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If No , why not?	N/A
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 from each sampled month –April, August and December 2022 No peak / non-peak months reported.
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If Yes , please give details: Unskilled – INR 355.30 per day Semi-Skilled – INR 363.30 per day Skilled – INR 371.30 per day
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A D1: If No , 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 E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> INR 53.75 / hour INR 430.00 / day INR 2580.00 / week INR 11,180/ month
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: _100_% of workforce earning above minimum wage

<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p><i>Based on the management interaction, it was noted that facility is paying the bonus at 8.33% of gross wages for all the employees. Bonus is paid once in year at the time of Diwali festival in the month of October/ November every year.</i></p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>Provident Fund</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>Provident Fund Please describe: PF is deducted at 12%</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. 2. Please describe: N/A</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
<p>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)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>L1: Please give details: In and out time records were available to verify the working hours of the facility employees.</p>		
<p>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></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>M1: Please specify amount/time: N/A</p>		
<p>M2: If yes, what was the calculation method used.</p>	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A		

<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The facility has a system of reviewing the wages bi-annually as per the local law as well as every fiscal year to provide promotions and increments.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through factory rules review, payroll records review and employee's interviews, it was confirmed that equal rates were being paid for equal work.</p>
<p>Q: How are workers paid:</p>	<p><input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p>

6: Working Hours are not Excessive

6: Working Hours are not Excessive

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

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

• **ETI**

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

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

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

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

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

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

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

• **Current Systems and Evidence Examined**

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

Current systems:

- Facility works in 3 shifts. Regular Shift Timings are
 - (1) A Shift: 7:00 – 15:30 hours
 - (2) B Shift: 15:00 – 23:30 hours
 - (3) General: 09:00 – 18:00 hours
- 3 Breaks of total 60 minutes – Lunch – 30 minutes and 2 Tea breaks of 15 minutes each is provided in each shift.
- Weekly off is staggered as the facility works on all days.
- No overtime work observed in the facility. This was also established through the review of attendance records of the sampled months of April, August and December 2022.
- Bio Metric attendance system is used to record time in and time out information for company employees and manual attendance cards for Security personnel.
- The factory provided Time and wages records from January 2022 to December 2022.

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

<p>Details:</p> <ul style="list-style-type: none"> • Employee interview • Management interview • Factory policy on working hours • Manual Attendance Records • Workers' contracts
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>No concerns observed on the day of audit.</p> <p>Local law and/or ETI requirement:</p> <p>Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>

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

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

Working hours' analysis Please include time e.g. hour/week/month <i>(Go back to Key information)</i>	
Systems & Processes	
<p>A. What timekeeping systems are used: time card etc.</p>	<p>Describe: Bio Metric System for all company employees and Manual Time Record System for Security Personnel.</p>

<p>B: Is sample size same as in wages section?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details</p>				
<p>C: Are standard/contracted working hours defined in all contracts/employment agreements?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:</p>				
<p>D: Are there any other types of contracts/employment agreements used?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate:</p> <table border="1" data-bbox="687 707 1493 801"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> <p>If "Other", Please define: N/A</p>	<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other		
<p>E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please detail hours, %, types of workers affected and frequency Please give details:</p>				
<p>F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?</p>	<p>F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:</p> <p>F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Maximum number of days worked without a day off (in sample):</p> <p>6 days</p>				
<p>Standard/Contracted Hours worked</p>					
<p>G: Were standard working hours over 48 hours per week found?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: If yes, % of workers & frequency:</p>				
<p></p>	<p><input type="checkbox"/> Yes H1: If yes, please give details:</p>				

H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> No	
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	No overtime observed in the provided sample month.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	__0__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: As per employee interviews overtime is voluntary and they are free to leave site after completion of regular hours.</i>
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>M1: Please give details of normal day overtime premium as a % of standard wages: 200% of ordinary rate of wages</i>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers & frequency: There is a policy that overtime will be paid at the legal rate, which is 200% of the normal wages. However, no overtime is performed in the facility.</i>
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other N/A	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	

	Overtime will be paid at 200% which is as per law.
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Workers strength is sufficient in line with the production and working hours within the legal limits.

7: No Discrimination is Practiced
[\(Click here to return to summary of findings\)](#)

ETI

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

• **Current Systems and Evidence Examined**

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

Current systems:

- There are no apparent concerns with regard to discrimination in any form at the facility.
- All the employees are treated with respects and have cordial terms with the management.
- Anti-Discrimination policy exists and has been communicated to the employees by displaying on the Notice Board.

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

Details:

- Review of Anti-Discrimination Policy
- The hiring and termination procedure, leave records
- Payrolls
- Attendance records
- Employee Interview

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>99</u> % A2: Female <u>01</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Nil
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: Based on review of records and interaction with employees there was no evidence of any discriminatory practice at this site.

Professional Development

A: What type of training and development are available for workers?	Workers are provided with trainings on social policies and procedures.
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:

Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No concerns apparent on the day of audit Local law and/or ETI requirement: Recommended corrective action:</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p>
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Observation:	
<p>Description of observation: None Local law or ETI requirement: Comments:</p>	<p>Objective evidence observed:</p>

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

<p>8: Regular Employment Is Provided (Click here to return to summary of findings) (Click here to return to Key Information)</p>
<p style="text-align: center;">ETI</p> <p>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.</p> <p style="text-align: center;">Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements. 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.</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:

- The facility recruits employees directly. Only Security guards are hired through an Agency.
- All the employees were issued Appointment Letters outlining the terms of employment in a language understood by majority of workers
- No migrant workers are hired.

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

Details:

- Appointment Letters
- Employee records
- Attendance & Payroll records
- Employee & Management Interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

No concerns apparent on the day of audit

**Local law and/or ETI requirement:
Recommended corrective action:**

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

Observation:

**Description of observation: None
Local law or ETI requirement:
Comments:**

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE): None

Objective Evidence Observed:

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	N/A

Migrant Workers:	
<p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>	
A: Type of work undertaken by migrant workers:	N/A. No migrant worker employed in the facility.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: Nil B2: Total number of (outside of local country) recruitment agencies used: Nil

<p>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?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A</p>
<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>D1: If yes, number and example of roles: N/A</p>	

NON-EMPLOYEE WORKERS

<p>Recruitment Fees:</p>	
<p>A: Are there any fees?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>B: If yes, check all that apply:</p>	<ul style="list-style-type: none"> <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 <p>B1 – If other, please give details: N/A</p>
<p>C: If any checked, give details:</p>	<p>N/A</p>

Agency Workers (if applicable)

(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)

<p>A: Number of agencies used (average):</p>	<p>A1: Names if available: 1 Central Investigation & Security Services (CISS) used for hiring Security guards.</p>
<p>B: Were agency workers' age / pay / hours included within the scope of this audit?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>C: Were sufficient documents for agency workers available for review?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>D: Is there a legal contract / agreement with all agencies?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: Please give details: Agreement with CISS dated 15/09/2022 for the period 01/09/2022 to 31/08/2023.</p>
<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: Facility monitors the labour standards of the agency through questionnaire and a written confirmation was available for review.</p>

<p style="text-align: center;">Contractors:</p> <p><i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i></p>	
<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details: N/A</p>
<p>B: If Yes, how many workers supplied by contractors?</p>	<p>Nil</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: N/A</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>N/A</p>

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

• Current Systems and Evidence Examined

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

Current systems:

- As per verified production record and interview conducted with the management, there is no process being sub-contracted.
- Facility is not using any home workers

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

Details:

- Inward / Outward material records.
- Management interaction
- Workers Interview

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

N/A

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observation:

Description of observation: N/A Local law or ETI/Additional elements requirement: Comments:	Objective evidence observed:
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Good Examples observed:	
Description of Good Example (GE): N/A	Objective Evidence Observed:

<ul style="list-style-type: none"> Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

<ul style="list-style-type: none"> Summary of homeworking – if applicable <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

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

- 9: No Harsh or Inhumane Treatment is Allowed
- [\(Click here to return to summary of findings\)](#)

ETI

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

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The facility has provided suggestion/complaint box to raise any concerns
B: If Yes , are workers aware of these channels and have access? Please give details.	The facility employees were aware about complaint box location and purpose of this mechanism.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	1. Grievance Committee 2. Suggestion/Complaint Box 3. Works committee 4. ICC Committee
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Worker can raise concerns through suggestion/complaint box.

<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>E1: 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. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>G1: 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</p> <p>H1: 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</p> <p>I1: 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:

- Facility has formed following committees:
 - Grievance Committee with 8 members – 4 each from Management & workers. Last 2 committee meetings were held on 20/08/2022 and 10/11/2022.
 - ICC Committee for addressing workers' grievances with 7 members – 3 each from Management & workers and 1 external member from NGO.
- A suggestion box was also installed for the purpose of anonymous reporting.
- There is a policy on Harsh and Inhuman Treatment.
- There are no apparent concerns regarding any forms of abuse at the facility, as per employee and management reports.
- All forms of discipline are in line with local legal requirements.

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

Details:

- Policy on Harsh and Inhuman procedures
- Employees and management interview

Any other comments: None

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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No concerns observed on the day of audit.</p> <p>Local law and/or ETI requirement: Recommended corrective action:</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p>

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

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

10. Other Issue areas: 10A: Entitlement to Work and Immigration (Click here to return to NC-table)
<p style="text-align: center;">Additional Elements</p> <p>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.</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:

- As per documents review, factory management representation and worker interview, all workers in the factory were Indian.
- No migrant worker from other country was noted in the facility.
- All workers had the proper legal rights to work in this region.

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

Details:

- Hiring procedure
- Personnel files
- Workers and management 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:

No concerns apparent on the day of audit

**Local law and/or ETI /Additional Elements requirement:
Recommended corrective action:**

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

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:

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

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

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

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.
 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. *Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.*

• **Current Systems and Evidence Examined**

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

Current systems:

1. Mr. Prolay Paul – Assistant Manager HR is responsible for all environmental issues.
2. The facility is aware of the legal environmental requirements.
3. The facility has obtained consent under air and water act (Consent & Authorisation No. PCC/DDD/G5507/1071247 dated 05/04/2022) issued by Pollution Control Committee, Daman & Diu and Dadra Nagar haveli, valid up to 28/02/2024.
4. The facility had conducted necessary air ambient and workplace noise monitoring test annually.
 Noise: Test Report # KRF/ENV/0514/22 - 23 dated 29/12/2022
 Air: Test Report # GL/04221214054/NS dated 03/01/2022
 Stack: Certificate # KRF/ENV/0508/22 - 23 dated 30/12/2022
5. Lux: Test Report # KRF/ENV/0515/22 - 23 dated 28/12/2022
6. 1 DG – 1010 KVA – Installation Certificate # WRIO/DNH/DAMAN/Rajshree/A-5709/SE/2019/004605-06 dated 14-10-2019.
7. Inspection Report of Compressor and lifting tools conducted through Vindeep Expo Engineers on 15/09/2022.
8. The facility disposed its hazardous waste through an authorized waste handler GEPIL at regular intervals. Agreement dated 01/10/2019 to 30/09/2024. Certificate # 4100008806. The last waste disposal was done on 14/10/2022.

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

Details:

- All legally required environmental documents were provided for review.
- Environmental policy
- Energy bills
- Worker and management interview
- Site tour

Any other comments: None

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law No concerns apparent on the day of audit. Local law and/or ETI/Additional Elements requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

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:

Other findings

Other Findings Outside the Scope of the Code
None







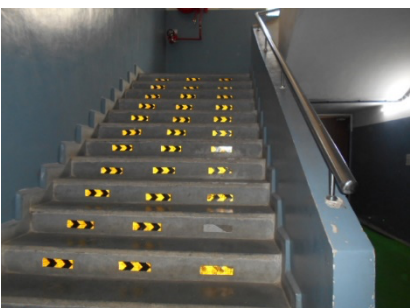



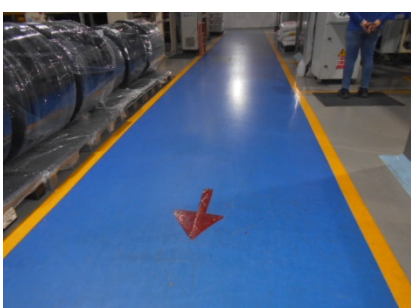
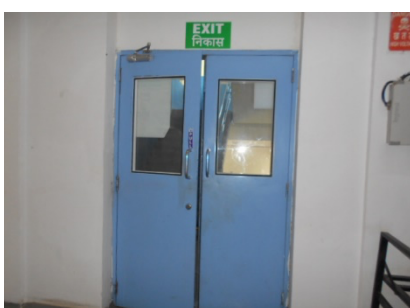
Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None

Appendix 1

<ul style="list-style-type: none"> Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary." <p style="text-align: center;"><input checked="" type="checkbox"/> Not Applicable please x</p>
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Photo Form

<p>Facility name board</p>	<p>Main gate & building No.1</p>	<p>Assembly point</p>
<p>Chemical store; MSDS displayed</p>	<p>Eye wash station</p>	<p>Fire equipment</p>
<p>Fire hydrant system</p>	<p>Fire alarm switch</p>	<p>Fire alarm panel</p>

Evacuation map posted in Hindi	GE # 1 - Medical room	First aid kit
		
Drinking water point	Dining area	Extrusion area
		
FG store	Printing area	TFM area
		
Staircase with handrails	Creche	Exit sign with emergency lights
		

Suggestion box	Aisles & arrows marked	H & S NC 1 – exit door opening inwards
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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

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

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>