Sedex Members Ethical Trade Audit Report

Version 7

Sedex, 18 St Swithin's Lane, London, EC4N 8AD, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

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Findings →

Audit details

Site details

Sedex site reference	ZS1047548	**Site name**	Rajshree polypack limited
Business name	Rajshree Polypack Limited	**Site address**	Survey No. 860 (26/3/P8) and 781 (26/3/P6) Vill: Manda Sarigam IN 396155

Audit details

Sedex company reference	ZC1045116	**Auditor company name**	Control Union
Audit company address	Stationsplein 13,, Zwolle, NL, 8011CW		
Date of audit	2026-03-12	**Audit conducted by**	Nitin Thorat
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		
Time in and out	Day 1 In 09:30 Out 18:30		
Audit type	Follow up		
Was the audit announced?	Semi announced		

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Findings →

Was the Sedex SAQ available for review?	No
Who signed and agreed CAPR?	Mr. Yatendra Adhaulia / HR Manager
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	Trade Union is not present in the facility.		
Reason for absence during the audit	Trade Union is not present in the facility.		
Reason for absence at the closing meeting	Trade Union is not present in the facility.		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. 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.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	The facility has been audited as per Semi Announced method and window of 4 week was provided to the client in advance of the audit. It was from 03/03/2026-02/04/2026

Lead auditor	Nitin Thorat	**APSCA Number**	21700604
Additional auditor			
Date of declaration	2026-03-12		

← Contents Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Yatendra Adhaulia
Title	HR Manager
Date of declaration	2026-03-12

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	Base code	NC ZAF601339226
6. Working hours are not excessive	6.A Ensure working hours (including overtime)...	Local law Base code	NC ZAF601339228
	6.C Provide workers with at least 24 hours of...	Local law Base code	NC ZAF601339225
	6.D Ensure that working hours do not exceed 6...	Local law Base code	NC ZAF601339227

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	Robust management systems	Robust management systems	Robust management systems	Robust management systems
1.A. Responsible recruitment and entitlement to work	Robust management systems	Robust management systems	Robust management systems	Robust management systems
2. Freedom of association and right to collective bargaining are respected	Robust management systems	Robust management systems	Robust management systems	Robust management systems
3. Working conditions are safe and hygienic	Robust management systems	Robust management systems	Robust management systems	Robust management systems
4. Child labour shall not be used	Robust management systems	Robust management systems	Robust management systems	Robust management systems
5. Legal wages are paid	Robust management systems	Robust management systems	Robust management systems	Robust management systems
6. Working hours are not excessive	Robust management systems	Robust management systems	Robust management systems	Robust management systems
7. No discrimination is practiced	Robust management systems	Robust management systems	Robust management systems	Robust management systems
8. Regular employment is provided	Robust management systems	Robust management systems	Robust management systems	Robust management systems

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

← Summary of findings

Site details →

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓
10.C. Business ethics	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

Site details

Company and site details

Sedex company reference	ZC1045116	
Sedex site reference	ZS1047548	
Company name	Rajshree Polypack Limited	
Business ownership type	GOODS	
Site name	Rajshree polypack limited	
Site name in local language	Hindi	
GPS location	**GPS address**	Survey No. 860 (26/3/P8) and 781 (26/3/P6), Vill: Manda, Sarigam. 396155
	Coordinates	20.282127 N, 72.838538 E.
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Mr. Yatendra Adhaulia
	Job title	Manager HR
	Phone number	+917045114243
	Email	ramswaroop@rajshreepolypack.com

← Management systems

Worker analysis →

Company and site details

Applicable business and other legally required business license numbers and documents	1. Factory License - No: 47513, Issued for 500 workers and 5000 HP, valid till 31/12/2025, issued by Deputy Director Industrial Safety and Health, Valsad. The facility has applied for renewal on 18/10/2025. Verify form 3; Application no: 3793963. 2. Pollution consent order - No: AWH58411, dated: 19/10/2022, Validity: 30/06/2027, issued by GPCB. 3. Groundwater extraction permission - No: CGWA/NOC/IND/ORIG/2025/21496, Dated: 16/06/2025, Validity: 19/04/2026. Issued by the Department of Water Resources. 4. Approved plant layout - No: DISH/F-MAP/2022/71, Dated: 12/01/2022. issued by the Director of Industrial Safety and Health, Valsad. 5. Building stability certificate - No: KAN/STB/438-22; dated 21/02/2022; issued by Er. Kaushik H Lad (Competency certificate No: GUJ/DISH/CPT/A/0325/2014.) 6. Annual electrical inspection performed on 08/08/2025 by the office of Assistant Electrical Inspector Valsad. 7. Fire NOC - The height of the factory building is 11.76 meters; hence fire NOC is not applicable. As per the notification No. GH/V/68 OF 2021/AGN-102021-100-L1, Dated - 08/07/2021 Fire Noc is applicable for high-rise buildings having a height above 15 meters.

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Packaging activities
	Secondary	
	Other	
Product type	Manufacturing of rigid sheets, Thermoforming, Printing and Sleeving.	
Process overview	Manufacturing of rigid sheets, Thermoforming, Printing and Sleeving. Receipt of raw material - Coving and Mixing - Filtering - Sheet Extrusion - Cooling - Trimming - Winding - Inspection - Packing - Storage - Dispatch. Main Equipment's Extruder - 03 Thermoforming machine - 12 Printing machine - 07 Sleeving machine -04	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	7013m²

← Site details

Worker analysis →

Site scope

Building 1	**Last construction works on site**	2021
	If building is shared, provide details	The building is not shared premises
	Number of floors	1
	Description of floor activities	Peripheral area - Main Gate, Security Cabin, Assembly point, Chemical storage, Utility area, Lunchroom, Scrap area, toilet and washroom.
Building 2	**Last construction works on site**	2021
	If building is shared, provide details	The building is not shared premises
	Number of floors	3
	Description of floor activities	Ground Floor RM Storage, FG storage, Thermoforming, Printing, Sleeving, Extruder, Grinding, Packing material storage, workshop, toilet and washroom. First Floor Admin office, Lab, Conference room, Washroom and toilet. Second Floor Pantry, Engineering Storage and Staff Lunchroom.

Is there any difference between the site scope of the audit and the Sedex site profile?	No

← Site details

Worker analysis →

Site scope

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No
Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not provided The site does not organize worker transport to the worksite; workers arrange their own transport as it is not local legal requirement.

Work patterns

Approximate workers on site per month (% of peak)	**January**	95-100%	**February**	95-100%
	March	95-100%	**April**	95-100%
	May	95-100%	**June**	95-100%
	July	95-100%	**August**	95-100%
	September	95-100%	**October**	95-100%
	November	95-100%	**December**	95-100%
Is there any night shift work at the site?	No			

← Site details

Worker analysis →

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other certification BRCGS Certificate no: IN25/000000113; Dated: 13/02/2025; Validity: 19/02/2026.
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	Yes The site has been assessed for negative impacts on the human rights, lands, resources, territories, livelihoods, or food security of indigenous peoples or the local community Verified the document no: RPPL/HRIA/00/26; Date: 01/01/2026.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes A Human Rights Impact Assessment (HRIA) was conducted within the last three years at this site. Verified the document no: RPPL/HRIA/00/26; Date: 01/01/2026.

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	76	*(72.4%)*	29	*(27.6%)*	-	-	105	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	67	*(69.8%)*	29	*(30.2%)*	-	-	96	*(91.4%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	9	*(100%)*	0	*(0%)*	-	-	9	*(8.6%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	56	(72.7%)	21	(27.3%)	-	-	77	(73.3%)
International migrant workers	0	-	0	-	-	-	0	(0%)
Total migrant workers	56	(72.7%)	21	(27.3%)	-	-	77	(73.3%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	Uttar Pradesh, Bihar, West Bengal & Jharkhand

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	6	(66.7%)	3	(33.3%)	-	-	9	(8.6%)
15 - 17 years old	0	-	0	-	-	-	0	(0%)
Under 15 years old	0	-	0	-	-	-	0	(0%)

* % of total workforce

← Worker analysis

Worker interviews →

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	Facility does not have peak season.
Please list the nationalities of all workers, with the three most common nationalities listed first	Indian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	72%	28%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 *(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 *(0%)*
Workers paid hourly / daily rate	0 -	0 -	- -	0 *(0%)*
Salaried workers	76 *(72.4%)*	29 *(27.6%)*	- -	105 *(100%)*

* % of total workforce

← Worker analysis   Worker interviews →

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	76	(72.4%)	29	(27.6%)	-	-	105	(100%)
Other	0	-	0	-	-	-	0	(0%)

* % of total workforce

If other payment cycle entered, please provide details	Nil

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	10	(100%)	0	(0%)	-	-	10
Supervisors or team leaders	102	(100%)	0	(0%)	-	-	102
Administrative staff	4	(80%)	1	(20%)	-	-	5

← Worker analysis

Worker interviews →

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	4 group of 5 workers
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis

Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) Workers don't raise any concerns or complaints.
What did the workers like the most about working at this site?	Communication (e.g. from management) Equal opportunities Grievance mechanisms Pay Social activities and events Work atmosphere (e.g. treatment by supervisors)
Additional comments	Workers reported that they enjoyed working at the company. They are only required to perform tasks specifically assigned to them, with no multitasking involved. Additionally, all workers expressed that they have a good relationship with management.
Attitude of workers' committee/union representatives	All Works committee members were positive about the facility and looked forward to developing relationships with the management team. Works committee members interview was conducted privately in a separate place. All works committee members replied naturally regarding their responsibilities as Works committee members, and they also informed that they can easily carryout their daily job without any difficulties.
Attitude of managers	The managers were cooperative and open during the audit. They were very enthusiastic in providing information, documents, and reports required for the audit. Updated data and supporting materials were readily available and shared during the process. At the end of the audit, all noncompliance were acknowledged by the facility, and the management stated that corrective actions would be taken to address the issues identified.

← Worker analysis

Measuring workplace impact →

Workers interviewed by type

	Total
Permanent workers	21
Temporary or fixed-term employees	0
Agency or subcontracted workers	5
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	13	7	-	20
Workers interviewed individually	3	3	-	6

← Worker analysis

Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	12	8	-	20
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	12	8	-	20

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	5.0%	2.0%	-	7.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	3.1%	1.5%	-	4.6%
Last full calendar year (2025)	5.2%	2.3%	-	7.5%
Previous full calendar year (2024)	4.9%	3.1%	-	8.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

← Worker interviews

Code area 0 →

Are accidents recorded?	Yes The facility maintains the accident register i.e. Form No: 29. No reportable accidents happen in facility.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%

← Measuring workplace impact
Code area 0 →

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

← Measuring workplace impact

Code area 0 →

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Measuring workplace impact

Code area 1 →

Systems and evidence examined to validate this code section	Current System: 0. A. The facility allowed the audit team to visit the entire facility and interact with workers and also provided access to all documents required for the audit. The facility has provided cooperation to complete the audit process effectively. This periodic audit was conducted by CU Inspections and Certifications India Pvt Ltd. There were 2 auditors who assessed the facility's Operations in 1.25 man-days. The scope of this audit was based on the 4 Pillar SMETA systems. 0. B. The facility does not offer bribes or any unethical offers to the auditing team. 0. C. The facility completed the contracting process and shared all site information in advance of the audit. The facility did not share SAQ in advance of the audit. Rajshree Polypack Limited is located at Survey No. 860 (26/3/P8) and 781 (26/3/P6) Vill: Manda, Sarigam - 396155 India. 0.D. The facility has a written human rights policy in place, approved by the management and communicated to all the workers by displaying on the facility premises. Verified the policy Doc no: RPPL-POL-1.7; Dated: 01/01/2025 Also, the facility has communicated the policy during training, verified the training date: 19/12/2025 Training given by Mr. Yatendra Adhaulia- Manager HR. Follow up Audit conducted on 12.03.2026 0. A. The facility allowed the audit team to visit the entire facility and interact with workers and also provided access to all documents required for the audit. The facility has provided cooperation to complete the audit process effectively. This follow up audit was conducted by CU Inspections and Certifications India Pvt Ltd. There were 1 auditor who assessed the facility's operations in 1 man-day. The scope of this audit was based on the 4 Pillar SMETA systems. The facility has been audited as per semi announced method and window of 4 week was provided to the client in advance of the audit. It was from 03/03/2026-02/04/2026 Evidence examined: • Facility licenses. • Personal files of workers. • Worker's handbook • Facility policies and trainings. • Interactions with workers and management

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a No forced labour & bonded labour policy doc no: RPPL-POL-06; Dated: 01/01/2025 to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding forced labour & bonded labour. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding forced labour & bonded labour. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section

Current System:

1. A. It was noted from the review of forced labor, bonded labor policy & personal files of 26 out of 26 selected sample workers & interviews with selected sample workers that the facility is aware of the requirement and does not practice employment of forced, bonded, human trafficking labor or any other form of modern slavery. Verified the forced labor & Bonded labor remediation policy doc no: RPPL-POL-06; Dated: 01/01/2025.

1. A. 1. No incidents of forced labor were identified during the site visit and interactions with 26 out of 26 selected sample workers. However, the facility has policy and procedure in place. Verified the forced labor & Bonded labor remediation policy doc no: RPPL-POL-06; Dated: 01/01/2025.

1. B. The facility doesn't control workers through threats, penalties, coercion, physical force, violence, or harsh or inhumane treatment, Verified the same from selected sample workers interviews and review of personal files of 26 out of 26 selected sample workers.

1. C. Workers from the facility are free to leave the workplace after completing their working hours. Further, it was noted from the selected sample workers' interviews that management does not restrict workers' freedom of movement.

1. D. Workers are not faced with any intimidation by the facility, and the facility is aware of the requirements of the workers' relation management. Verified the same through the worker's interview.

1. E. Workers are free to move in the facility premises for their respective work, and there is no monitoring or unreasonable prevention from communicating with others inside or outside the workplace of workers during rest breaks, meetings confirmed by the workers during the interview.

1. F. It was noted from interaction with workers and review of 26 out of 26 selected sample workers' personal files that the facility does not retain original identity papers of the workers. During the interview, it is confirmed with workers that age proof records such as Adhar card, leaving certificate, voter card, and driving licenses are submitted in the Xerox copy format.

1. G. Verified from the review of full and final settlement records of recently left workers that the facility has all the due benefits like leaves, wages, etc., paid to the workers within 15 days. Further, it was noted from a review of 26 out of 26 selected sample workers' appointment letters that workers are free to leave employment by

← Code area 0 Code area 1.A →

giving a notice period of 30 days.

1. H. It was noted from the document review that all workers achieve the legal minimum wage. The facility is paying wages on or before the 07th day of every month.

1. I. The facility does not put workers in debt, does not provide any loan scheme, and does not charge or withhold part of a worker's salary as a deposit or require workers to post bonds or repay government levies, as confirmed with workers during the interview.

1. J. It was noted from document review & interaction with selected sample workers, that the facility does not charge or withhold any part of workers' salaries as deposits, nor are workers required to post bonds or repay government levies.

1. K. It was noted from the interaction with workers & review of selected sample workers' personal files that no payments are withheld until the end of employment, with no delayed payments or financial schemes restricting workers from leaving their jobs.

1. L. It was noted from a review of 26 out of 26 selected sample workers' wage & attendance records from selected sample months that all workers have achieved the legal minimum wage however, during the document review and interactions with management and workers, it was noted that 6 out of 26 selected sample workers were found to be performing excessive overtime hours during the selected sample months of July 2025, October 2025, and November 2025. Overtime records indicated 4 hours per day (34 hours per week & 46 hours per month) in July, 3.5 hours per day (39 hours per week & 53 hours per month) in October, and 3.5 hours per day (49 hours per week & 81 hours per month) in November, which is not in compliance with applicable labor laws and company working hour policies. NC raised in section 6. Moreover, the lowest wages paid to the workers for standard working hours were found to be 16645 INR per month.

1. M. The facility has conducted a risk assessment of the forced labor policy and procedure to ensure that workers shall not be placed in situation of forced labor by its own management and third parties. Verified risk assessment on Policy and Procedure Documents Date: 01/01/2025.

1. N. Not applicable as the facility does not use prison labor.

1. O. It was noted from review of records and interaction with management that the facility is complying with all other applicable laws that impose conditions on Code Area 1.

← Code area 0 Code area 1.A →

Evidence examinations:
• 26 personnel files for selected worker samples
• Employee handbook
• Management and employee interview.

Follow up audit was conducted on 12.03.2026
1.L. It was noted from a review of 26 out of 26 selected sample workers' wage & attendance records from selected sample months that all workers have achieved the legal minimum wage and during the follow-up audit, a review of the in-out time records and attendance registers for all 26 selected sample workers for January 2026 and February 2026 confirmed that the registers were properly maintained and that weekly working hours, including overtime, did not exceed 60 hours, with the maximum recorded being 56 hours, ensuring that overtime hours remained within legal limits. Moreover, the lowest wages paid to the workers for standard working hours were found to be 16645 INR per month.

Evidence examinations:
• 26 personnel files for selected worker samples
• Management and employee interview.
• In-out time records and attendance registers for all 26 selected sample workers for January 2026 and February 2026

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Yes The facility has human right policy in place, and the policy include statement about modern slavery. Doc No: RPPL-POL-1.7; Dated: 01/01/2025
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a Recruitment Policy to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding Recruitment. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding Recruitment. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1

Code area 2 →

Systems and evidence examined to validate this code section

Current System -

1. A. A It was observed from the review of 26 out of 26 selected sample workers' personal files and through worker interviews that the facility ensures all workers have the legal right to work. The facility does not retain the original identity documents of workers. Instead, photocopies of age and identity proof documents such as Aadhaar cards, school leaving certificates, voter cards, and driving licenses are maintained in their personal files.

1. A. B. It was noted from the review of 26 out of 26 selected workers' personal files and identity records, such as Aadhaar cards, school leaving certificates, and academic records, that the facility ensures all workers have the legal right to work.

1. A. C. It was noted from review of personal files of 26 out of 26 selected sample workers that nature of work, working conditions, employment terms and wages are same as communicated with workers at the time of recruitment.

1. A. D. It was noted from the document review that the facility uses one subcontractor for security services but does not use any employment agencies or recruitment partner for recruitment of workers however a specific clause has been included in the agreement with subcontractor regarding the minimum employment age of workers, which is set at 18 years. The facility has communicated its child labor remediation plan and procedures to the subcontractor and has instructed them to follow to the same. Verified the child labour policy and procedure doc no: RPPL-POL-07 Dated: 01/01/2025

1. A. E. The facility engages one subcontractor for security services and recruits all other workers directly in accordance with company policy.

- M/s. CISS Services Limited
Authorized to provide 09 security person.
Agreement dated 01/09/2024, Validity 31/10/2026.
PSARA certificate: PSA/L/35/GJ/2024/JAN/3/2042; Dated: 09/01/2024; valid till: 08/01/2029.

1. A. F. It was noted from review of 26 out of 26 selected personal files and interaction with workers that the facility is paying service charges to the subcontractor upon receiving their bills and ensuring that workers do not need to pay any charges or fees to the agency.

1. A. G. It was noted from the review of 26 out of 26 selected sample workers' personal files and interaction with workers that the facility has undertaken due

← Code area 1 Code area 2 →

diligence to identify the type and value of recruitment fees and related costs for all workers. Further, it has been confirmed that no recruitment fees and related costs are paid by the workers, including travel, visa, etc.

1. A. H. It was noted from review of the service agreement signed between subcontractor and facility that no recruitment fee or cost shall be charged to the workers. It is also noted from the review of 26 out of 26 selected sample workers' personal files and interactions that workers have not paid any recruitment fee or cost.

1. A. I. It was noted from review of 26 out of 26 selected sample workers personal file and interaction with workers that workers have not paid any recruitment fee or related cost.

1. A. J. No evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 1. A.

Evidence examined
- Workers' Personal Files
- Interaction with Management and Interview with employees
- Recruitment policy.
- Subcontractor workers records

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	Yes
How many contractors are present and what are the names of the employer(s)?	There is a security contractor named M/s. CISS Services Limited
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Yes
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

Migrant workers

← Code area 1.A Code area 2 →

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Uttar Pradesh, Bihar, West Bengal & Jharkhand

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
Were recruitment fees or costs identified during worker interviews?	No It was noted from document review and interaction with workers that recruitment fees or costs are not identified during worker interviews.

← Code area 1.A

Code area 2 →

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed and maintain relevant policy & procedure to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the responsible person for this base code area who has the authority to make decisions and implement the policies and procedures. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly. Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1.A

Code area 3 →

Systems and evidence examined to validate this code section	Current system: 2. A. Based on employee interviews, all workers demonstrated an understanding of their legal rights regarding trade unions, collective bargaining agreements, and worker & grievance committees. The facility does not restrict employees from forming or joining trade unions and maintains an open-minded approach toward the activities of trade unions, worker committees, and their organizational efforts. 2. B. It was noted during document review and interactions with workers, that facility does not prohibit, discourage, or interfere with workers' rights to join trade unions or worker representation bodies. Workers are free to elect their representatives and engage in collective bargaining. 2. C. The facility has the following committees and has established procedures to communicate with the workers. - Health & Safety Committee: Recent meeting was conducted on 26/12/2025 & previous meeting conducted on 22/09/2025 with Total members 10 (05 from management and 05 from workers). -Works Committee: Recent meeting was conducted on 09/12/2025 & previous meeting conducted on 16/09/2025 with Total members 10 (05 from management and 05 from workers). - Grievance committee: Recent meeting was conducted on 09/12/2025 & previous meeting conducted on 15/09/2025 with Total members 06 (03 from management and 03 from workers). - POSH committee: Recent meeting was conducted on 22/12/2025 Total members 04 (01 from management, 02 from workers, and 01 External member); verified external member Advocate Mr. Vivek Itwala (Competent reg no - SR/LB/20037) Appointment Letter dated 01/01/2024. - The facility has 01 Suggestion box, which is checked once a month. No complaints/grievance was raised in the grievance register; the register was checked on 18/12/2025. 2. D. Based on the employee's interview and interaction with facility management, workers' representatives are not discriminated against, and they are free to carry out their functions, like meetings periodically. Based on the employees' interview that the workers have the right to freedom of association and collective bargaining is not restricted under the law. The employer facilitates, without interference, the

development process of workers.

2. E. No other evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 2.

Evidence examined –
•Facility policy and procedure
•Suggestion Box
•Interaction with management and workers

← Code area 1.A

Code area 3 →

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← Code area 2 Code area 3 →

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a General Health and Safety Policy and procedure doc no: RPPL-POL-08; Dated: 01/01/2025, to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding General health and safety. Resources Grade: Robust The facility has appointed Mr. Manohar Salve - Health & Safety officer as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding General health and safety. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly. Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures including assessing the risk and hazard, involved in all operations, activities job roles taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	Base code	NC ZAF601339226

← Code area 2 Code area 4 →

Systems and evidence examined to validate this code section	Current system: 3. A. The facility has established General Health and Safety Policy and procedure doc no: RPPL-POL-08; Dated: 01/01/2025, approved by Mr. Ramswaroop Thard - Director. It was noted during the document review that the facility has conducted medical examinations for all workers, dated 21/11/2025, medical examination conducted by Dr. Atul R. Toshniwal (MBBS, C.I.H)- Olive multispecialty clinic, Silvassa (D.&N.H) (Reg - 87143) industrial physician - Silvassa. 3B: It was noted from the review of Hazard Identification and risk assessment and risk control document that facility has assessed the risk and hazard involved in all operations, Verified Hazard Identification and risk assessment and risk control, Doc Name – Risk & Impact matrix, dated: 0/01/2025, approved by Mr. Ramswaroop Thard - Director. 3.C. Mr. Manohar Salve - Health & Safety officer is the person responsible for health and safety, with the appropriate knowledge and authority to effectively implement health and safety systems and processes. 3.D. The facility has formed a health and safety committee consisting of workers and management, verified Health Safety Committee record & Recent meeting was conducted on 26/12/2025 & previous meeting conducted on 22/09/2025 with Total members 10 (05 from management and 05 from workers). 3.E. Facility conducted General Health & Safety training on 15/12/2025 training given by Mr. Manohar Salve - Health & Safety officer to 45 workers. 3.F. Facility has measured the effectiveness of health and safety training on 15/12/2025 moreover it was noted during interaction with workers that all workers understood the content of training. 3.G. It was noted during the document review and interaction with management that the facility has providing 04 first aid box throughout the facility as well as facility has conducted first aid training on 24/11/2025 (Valid for 2 years), training was given by Industrial Physician Dr. Atul R. Toshniwal (MBBS, C.I.H)- Olive multispecialty clinic, Silvassa (D.&N.H) (Reg - 87143) and training was given to 25 workers. 3.H. Facility has provided appropriate and relevant personal protective equipment, such as Eyeglasses, Nose masks, Earplugs, Hand Gloves, and shoe covers, etc., at no cost to the employees. Verified PPE issue record for 23/12/2025. - Training on PPE handling has been conducted on 15/12/2025, training given by Mr. Manohar Salve - Health & Safety officer, training given to 41 workers.

← Code area 2 Code area 4 →

3.I. The facility has maintained the accident register and ensured an effective investigation procedure is in place. Verified accident register form no 29 - 0 accident reported in the register of 2024-25.

3.J. The facility does not have processes & activities, or machines that require a work permit. However, it is confirmed with workers that they do not have restrictions on working & seek safety or leave the premises, without the threat or fear of retaliation, when they believe hazards in the workplace have placed them in imminent danger.

3.K. It was noted from document review that facility has obtained building stability certificate from concerned authority; KAN/STB/438-22, dated 21/02/2022, issued by Er. Kaushik H Lad (Competency certificate No- GUJ/DISH/CPT/A/0325/2014.)
- It was noted during site visit that the ventilation system is not provided in the cup grinding area as there is health hazard identified due to dust generation.

3. L. It was noted from the document review and discussions with management that the facility has conducted mock drill training in General shift, and mock drill was observed by Mr. Manohar Salve - Safety officer. - Diploma in industrial safety (Certificate No -19386685)

- General shift & First shift: Date 30/11/2025, Time: 11:15 AM, Time taken for evacuation: 02 Min 38 sec. Head count: 41.
- Second shift: Date 30/11/2025, Time: 03:30 PM, Time taken for evacuation: 02 Min 30 sec. Head count: 56.
-It was noted from the review of training records and interaction with workers that the facility has provided Fire-fighting training on 30/11/2025, training given by Mr. Manohar Salve - Safety officer - Diploma in industrial safety (Certificate No -19386685) Training was given to 50 people.
- Facility has provided functional fire extinguishers (114), fire alarms panel (05), Hooters (05), MCP (05), emergency exit (11), Eye washers (01) sand buckets (03), emergency Light (11), assembly point (01).
- Further, based on the document review of fire extinguisher service records, that facility has inspected fire-fighting equipment on 16/06/2025 (01-year Validity), carried out by Pratibha Fire service Vapi, Silvassa.
- It was noted during site visit that pathway found blocked by machine and materials in printing area, extrusion process & Glass grinding area.
- During the site visit it was noted that pathway not provided in sleeving area & Canteen area.
- During the site visit, it was observed that the canteen area has a seating capacity exceeding 10 persons; however, a secondary exit has not been provided as required.

← Code area 2

Code area 4 →

3.M. Based on facility site visit and documents review that all the machines installed in the facility are fit for use and provided with safety guards.

Examination records for lifting tools and pressure vessels have also been verified workplace & Machine Safety:
- Air Receiver (06 Nos): Date of inspection: 10/12/2025, Due Date: 09/06/2026 Carried out by Mr. Kalpesh Ahir - Mechanical engineer (Competent person GUJ/DISH/CPT/A/0353/2013).
-Goods Lift test repot (17) - Date of inspection: 10/12/2025, Due Date: 09/06/2026 Carried out by Mr .Kalpesh Ahir - Mechanical engineer (Competent person - GUJ/DISH/CPT/A/0353/2013).
-Safety Valve (06) - Date of inspection: 10/12/2025, Due Date: 09/06/2026 Carried out by Mr. Kalpesh Ahir - Mechanical engineer (Competent person - GUJ/DISH/CPT/A/0353/2013).

3. N. It was noted from process flow chart that the facility uses following hazardous chemicals in the process and it was found during audit that all chemicals are stored adequately.

Workers in the facility handle the following chemicals -
1) offset ink
2) Thiner
- The facility has provided training on chemical handling on 15/12/2025, provided by Mr. Krishna Patil- Plant Manager, training given to 44 workers.
- It was noted during site visit that Oil Storage area does not provide with secondary container.

3. O. The facility has provided rubber mats and safety guards for the electrical panel, and the machine parts are covered with guards.

3. P. The facility has prepared and implemented an Emergency Preparedness plan, Doc Name: Onsite Emergency plan. Doc No: RPPL-HR-04-010722-R00 Dated: 12/09/2025

3. Q. It was noted from the facility site visit that the facility has provided Ceiling Fan (56), Air Conditioner (09), and Exhaust Fan (12) in the workplace to provide workers' comfort and reduce the risk due to temperature.

3. R. Facility has provided total toilets (08) male & (05) female, (18) Urinals, (18) handwash station in facility premises additionally, facility has provided clean drinking water points (01) to all their Employees. Verified drinking water test report no: FHHL/2511/0669-1, dated: 03/12/2025 Test carried out by FHHL Pvt Ltd. (Food

Hygiene & Health Laboratory)
- During the site visit, it was noted that the FG storage area was provided with stacks; however, the area between two stacks was found to be blocked by finished goods.

3.S. Facility has not provided On-site or Off-site accommodations facility to the workers.

3.T. The facility does not provide worker transportation as it is not a local legal requirement, and workers arrange their own transport.

3.U. No evidence found that the facility fails to comply with the legal requirement.

Evidence examined
•Training records
•Accident Register
•Policy Manual
•PPE Register
•Risk Assessment

Follow up audit conducted on 13.03.2026

3.K. It was noted during site visit that the facility has provided ventilation system in cup grinding area.

3.L During the follow-up audit, it was observed during the site visit that all pathways in the facility, including the extrusion, printing, glass grinding and sleeving areas, were clear and free from obstruction.
-The facility has provided pathway marking in sleeving area and canteen area.
-The facility has provided secondary exit in canteen area

3.N. It was noted during site visit that the facility has provided secondary containment in the oil storage area.

3.R. It was noted during site visit that the facility has cleared the area between two stacks that was previously blocked by finished goods and is easily accessible.

Evidence examined
•Training records
•Accident Register
•Health Register
•Policy Manual
•Test reports

← Code area 2 Code area 4 →

- PPE Register
- Risk Assessment
- Site visit

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF601339226

Non-compliance

Due 2026-01-21

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

206 - Systemic occurrence of blocked fire exits

Description

It was noted during site visit that pathway found blocked by machine and materials in printing area, extrusion process & Glass grinding area.

Description (carried over)

It was noted during site visit that pathway found blocked by machine and materials in printing area, extrusion process & Glass grinding area.

Corrective and preventative actions

It is recommended to the facility to clear all pathway that has been blocked by machine and materials.

Corrective and preventative actions (carried over)

It is recommended to the facility to clear all pathway that has been blocked by machine and materials.

Evidence

Status

Closed (2026-03-13)*

Time given to resolve

Immediate

Verification method

Follow up audit

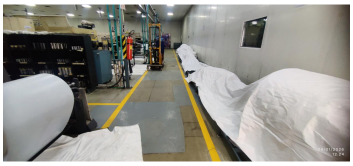
Area of non-compliance/non-conformance

Base code

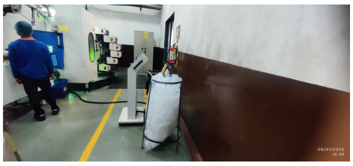
← Code area 3

Code area 4 →

[Pathway blocked by machine.jpg]

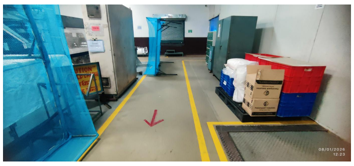


[Printing area pathway.jpg]



[Glass grinding Pathway blocked.jpg]

[extrusion process pathway (2).jpg]



[extrusion process pathway.jpg]

* PDF generated at 10:45 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes The facility uses the following chemicals, and workers have access to them. - Offset Ink - Thinner
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Building stability certificate - No: KAN/STB/438-22; dated 21/02/2022; issued by Er. Kaushik H Lad (Competency certificate No: GUJ/DISH/CPT/A/0325/2014.) & Approved plant layout - No: DISH/F-MAP/2022/71, Dated: 12/01/2022. issued by the Director of Industrial Safety and Health, Valsad.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No

← Code area 3 Code area 4 →

Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

[← Code area 3]   [Code area 4 →]

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 3

Code area 5 →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a child labor prevention and remediation policy Doc No: RPPL-POL-07; Dated: 01/01/2025 to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding child labor prevention and remediation. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding child labor prevention and remediation policy and procedure. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 3 Code area 5 →

Systems and evidence examined to validate this code section	Current system: 4. A. Based on the employee interviews, review of the facility's Child Labour Prevention and remediation policy, age proof documents, and recruitment policy, the facility has complied with ILO Standards for Child Labour. The youngest employee found within the samples is 18.11 years old. Date of Joining: 09/02/2025 and date of birth: 23/01/2007 4. B. Based on review of recruitment policy documents, the employee's ID for age proof, such as Voter ID, Driving License, was checked by the admin head before hiring. The employees without valid ID certificates are not being hired. 4. C Not applicable; however, during the audit and interactions with the youngest workers, that facility has not hired workers below 18 years old. The youngest worker found in the facility is 18.11 years old. 4. D. It was noted during the audit, through document review, that the facility does not employ workers under 18 years. 4. E. It was noted during the audit, through interactions and interviews with workers, that the facility does not provide an accommodation facility. 4. F Based on the policy review, the minimum hiring age of the facility is 18 years. Based on employees' interview, any suspicion of child labor can be reported to facility management, and the facility will proceed according to the child labor prevention and remediation policy and procedure, Doc no: RPPL-POL-07; Dated: 01/01/2025 4. G Not applicable as youngest worker found in facility is 18.11 years old however the remediation and safeguarding measures for underage workers are in place and aligned with ILO guidance. 4. H. No evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 4. Evidence Examined: • Child labour prevention and remediation policy • HR Policy • Interaction with Management and Interview with employees • Employees personal files (Age proof record – Voters Id card, Pan Card and Aadhar Card)

← Code area 3 Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	8%
Enter the legal age of employment	18
Enter the age of the youngest worker identified	18
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

← Code area 4 Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 4

Code area 5.A →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a legal wage policy to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding legal wage. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding legal wage. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 4

Code area 5.A →

Systems and evidence examined to validate this code section	Current System - 5.A. During the audit, it was noted that for 26 out of 26 selected sample workers from July 2025 (Non-Peak month), October 2025 (Random month), and November 2025 (Current month), the facility has maintained proper attendance and wage records. It was also found that the lowest wage paid was 16645 INR /month. and all workers' wages are meeting the legal minimum wage. In accordance with the minimum wage as per the applicable legal wage notification. Unskilled - 12727 INR /Month Semi-Skilled - 13013 INR /Month Skilled - 13273 INR/Month 5. B. All five eligible employees are covered under the EPF and ESIC schemes, and workers are provided with 15 PL per year. This was verified through ECR challans for July 2025 (non-peak month), October 2025 (random month), and November 2025 (current month) 5. C. It was noted from document review and interaction with management and workers that there is no payment in-kind provided by the facility. 5. D. No fines or illegal deductions were made from employees' wages as disciplinary measures, verified through the review of the fine register and interactions with 26 out of 26 selected sample workers. 5. E. It was confirmed through worker interviews that wages are not deducted for training hours or rest breaks, and that workers are paid for all activities performed at the facility. 5. F. It was noted from the review of 26 out of 26 selected sample worker's personal file that all workers are communicated information about wage details (rates of and total pay, benefits and insurances) before employment begins. 5. G. It was noted during interview of 26 out of 26 selected sample workers' personal files that all workers receive pay slip for each pay period with a breakdown of their wages, benefits and any deductions in understandable language. 5. H It was noted during the audit, through document review and interviews, that the facility complies with all applicable laws related to Code Area 5. Evidence examined: •List of National and Festival Holidays. •Wage register

← Code area 4

Code area 5.A →

•Pay slip
•Interaction with management and Employees
•Leave with wage records.
•26 Employees were interviewed, and the same number of records were reviewed for July 2025 (Non-peak month), October 2025 (Random month), and November 2025 (Current month).

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable

← Code area 5 Code area 5.A →

Actual required working hours	**Required hours per day**	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	8.0
	Max hours per month	8.0
Minimum legal wage	**Min per hour**	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	12727.0
Actual minimum wage	**Actual per hour**	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	16645.0
Minimum legal overtime wage	**Min per hour**	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

← Code area 5

Code area 5.A →

Actual minimum overtime wage	**Actual per hour**	160.04
	Actual per day	360.09
	Actual per week	1280.32
	Actual per month	1280.32

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 Workers records reviewed for July 2025 (01/07/2025 - 31/07/2025) 26 Workers records reviewed for October 2025 (01/10/2025 - 31/10/2025) 26 Workers records reviewed for November 2025 (01/11/2025 - 30/11/2025)
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes - Skilled - 13273INR /Month - Semiskilled - 13013 INR/Month - Unskilled - 12727 INR/Month
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100 % workers are earning above the minimum wages
Are there any bonus schemes used?	Yes 8.33% of annual basic wages.
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

← Code area 5

Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current System: 5. A. A: It was noted from document review of 26 out of 26 selected sample workers for July 2025 (Non-peak month), October 2025 (Random month), and November 2025 (Current month). and interaction with management that facility has conducted the living wage gap assessment as per anker methodology. The average living wage calculated is Rs 14,976 and the lowest wages paid by the facility are found to be 16,645 INR/Month. 5. A. B: Based on the living wage gap assessment report and the lowest wages paid by the facility, it was noted that the facility has paid wages above living wage. Evidence examined: • Facility Policy • Living Wage Survey • Salary registers • Pay slip • Interview with workers and management • 26 Employees were interviewed, and the same number of records were reviewed for July 2025 (Non-peak month), October 2025 (Random month), and November 2025 (Current month).

← Code area 5

Code area 6 →

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 5.A
Code area 7 →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a working hours policy to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding working hours. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding working hours. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust Management Systems The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 5.A

Code area 7 →

6. Working hours are not excessive	6.A Ensure working hours (including overtime)...	Local law Base code	NC	ZAF601339228
	6.C Provide workers with at least 24 hours of...	Local law Base code	NC	ZAF601339225
	6.D Ensure that working hours do not exceed 6...	Local law Base code	NC	ZAF601339227

← Code area 5.A
Code area 7 →

Systems and evidence examined to validate this code section

Current System:

6. A. It was noted from 26 out of 26 selected worker samples from July 2025 (Random month), October 2025 (Random month), and November 2025 (Current month), based on document review and management interaction, that the facility maintains accurate in/out time records. However, during the document review and interactions with management and workers, it was noted that 6 out of 26 selected sample workers were found to be performing excessive overtime hours during the selected sample months of July 2025, October 2025, and November 2025. Overtime records indicated 4 hours per day (34 hours per week & 46 hours per month) in July, 3.5 hours per day (39 hours per week & 53 hours per month) in October, and 3.5 hours per day (49 hours per week & 81 hours per month) in November, and the maximum weekly working hours recorded were 97 hours all of which are not in compliance with applicable labor laws and company working hour policies.

The facility operates in shifts, i.e., three shifts.
General shift - 09:00 Hrs - 18:00Hrs
First Shift: -06:00 Hrs - 14:30Hrs
Second Shift: -14:30 Hrs - 10:30Hrs

Additionally, the facility provides two tea breaks of 10 minutes each and a 30-minute lunch break in each shift.

6. B. It was noted during the audit, through interactions with 26 out of 26 selected sample workers and management, that workers receive all legally required rest and meal breaks, including continuous rest hours between shifts.

6. C. It was noted during document review and interaction with management that, for 26 out of 26 selected sample workers from July 2025 (Random month), October 2025 (Random month), and November 2025 (Current month), the facility maintains accurate in/out time records, and it is found that all the workers have been provided with one weekly off on rotational

- For July 2025 Highest working hours of 26 out of 26 selected sample workers found 266 Hrs./month.
- For October 2025 Highest working hours of 26 out of 26 selected sample workers found 274 Hrs./month.
- For November 2025 Highest working hours of 26 out of 26 selected sample workers found 289 Hrs./month.

- For July 2025 Average working hours of 26 out of 26 selected sample workers found 233 Hrs. /Month.

← Code area 5.A

Code area 7 →

- For October 2025 Average working hours of 26 out of 26 selected sample workers found 247 Hrs. /Month.
- For November 2025 Average working hours of 26 out of 26 selected sample workers found 241 Hrs. /Month.

- For July 2025 Lowest working hours of 26 out of 26 selected sample workers found 207 Hrs./ Month.
- For October 2025 Lowest working hours of 26 out of 26 selected sample workers found 204 Hrs./Month.
- For November 2025 Lowest working hours of 26 out of 26 selected sample workers found 205 Hrs./month.

- During the review of in-time and out-time records of 26 selected sample workers for the sampled months of July 2025, October 2025, and November 2025, it was noted that 3 out of 26 selected sample workers found working 15 days continuously without taking weekly off in November 2025 month.

6. D. Based on review of July 2025 (Random month), October 2025 (Random month), and November 2025 (current month), selected sample month in/out time records and interaction with 26 out of 26 selected sample workers that facility has maintained accurate working hours record. However, during the review of in-time and out-time records of 26 selected sample workers for the sampled months of July 2025, October 2025, and November 2025, it was noted that 6 out of 26 workers performed weekly working hours exceeding 60 hours per week, including overtime. The maximum weekly working hours recorded were 97 hours.

6. E. It was noted during the document review of workers' appointment letter that the facility maintains accurate in/out time records, and it was verified that the standard working hours in a week do not exceed 48 hours and are properly documented in workers' contracts.

6. F. It was noted from 26 out of 26 selected sample workers' attendance and In & Out time records for July 2025 (Random month), October 2025 (Random month), and November 2025 (Current month), the facility uses overtime voluntarily, and it is found between 2 hrs to 49 hrs per week in selected sample months.
During the document review and interactions with management and workers, it was noted that 6 out of 26 selected sample workers were found to be performing excessive overtime hours during the selected sample months of July 2025, October 2025, and November 2025. Overtime records indicated 4 hours per day (34 hours per week & 46 hours per month) in July, 3.5 hours per day (39 hours per week & 53 hours per month) in October, and 3.5 hours per day (49 hours per week & 81 hours per month) in November, and the maximum weekly working hours recorded were 97

← Code area 5.A

Code area 7 →

hours.

6. G. It was noted during the audit, through interactions with workers, that overtime is voluntary and workers can refuse overtime without penalty.

6. H. It was noted from review of Attendance and wage records of 26 out of 26 selected sample workers for July 2025 (Random month), October 2025 (Random month), and November 2025 (Current month) the facility has paid Overtime premium to the agency workers at the rate of 200% of the basic wages.

6. I. It was noted from 26 out of 26 selected sample workers attendance and in & out time records for July 2025 (Random month), October 2025 (Random month), and November 2025 (Current month), that the facility using workers' working hours and overtime hours responsibly.

6. J. It was noted from facility site visit and interaction with facility management that facility found complying with all other applicable laws that impose conditions on Code Area 6.

Evidence examined –
• Interaction with workers
• OT Register
• Document review
• Interaction with management
• 26 selected sample workers attendance and in & out time records for July 2025 (Non-Peak month), October 2025 (Random month), and November 2025 (current month).

Follow up audit conducted on 12.03.2026

6.A During the follow-up audit, a review of the in-out times and attendance registers for all 26 selected sample workers for January 2026 and February 2026 confirmed that the registers were properly maintained and that weekly working hours, including overtime, did not exceed 60 hours, with the maximum recorded being 56 hours, ensuring that overtime hours remained within legal limits.

6.C During the follow-up audit, review of in-out time and attendance registers for 26 out of 26 selected sample workers for January 2026 and February 2026 confirmed that the registers are properly maintained and that the facility provides the 7th day as a weekly off to all workers.

6.D During the follow-up audit, a review of the in-out times and attendance registers for all 26 selected sample workers for January 2026 and February 2026 confirmed that the registers were properly maintained. It was also verified that the weekly working hours, including overtime, did not exceed 60 hours, with the maximum recorded being 56 hours.

Evidence examined –
• Interaction with workers
• OT Register
• Document review
• Interaction with management
• 26 selected sample workers attendance and in & out time records for January 2026 (Random month), and February 2026 (current month).

← Code area 5.A

Code area 7 →

Findings: non-compliances

ZAF601339228

Non-compliance

Due 2026-03-22

Code area

6 Working hours are not excessive

Workplace requirement

6.A Ensure working hours (including overtime) are accurately recorded, and do not exceed legal limits or limits in collective bargaining agreements, whichever gives more protection for workers.

Issue title

469 - Working hours exceed what is allowed by law or collective bargaining agreement - systemic

Description

During the document review and interactions with management and workers, it was noted that 6 out of 26 selected sample workers were found to be performing excessive overtime hours during the selected sample months of July 2025, October 2025, and November 2025. Overtime records indicated 4 hours per day (34 hours per week & 46 hours per month) in July, 3.5 hours per day (39 hours per week & 53 hours per month) in October, and 3.5 hours per day (49 hours per week & 81 hours per month) in November, which is not in compliance with applicable labor laws and company working hour policies.

Description (carried over)

During the document review and interactions with management and workers, it was noted that 6 out of 26 selected sample workers were found to be performing excessive overtime hours during the selected sample months of July 2025, October 2025, and November 2025. Overtime records indicated 4 hours per day (34 hours per week & 46 hours per month) in July, 3.5 hours per day (39 hours per week & 53 hours per month) in October, and 3.5 hours per day (49 hours per week & 81 hours per month) in November, which is not in compliance with applicable labor laws and company working hour policies.

Corrective and preventative actions

It is recommended to the facility ensure overtime hours should not exceed the legal limits.

Corrective and preventative actions (carried over)

It is recommended to the facility ensure overtime hours should not exceed the legal limits.

Status

Closed (2026-03-13)*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 6

Code area 7 →

Local law reference

In accordance with Factories Act 1948, Section 64 (4) (i), in making rules under this section, the state Government shall not exceed, except in respect of exemption under clause (a) of sub-section (2) the following limits of work inclusive of overtime: - (i) the total number of hours of work including overtime in any day shall not exceed 10 (ii) the spread over, inclusive of intervals for rest, shall not exceed twelve hours in any one day, (iii) the total number of hours of work in a week, including overtime, shall not exceed sixty (iv) and the total number of hours of overtime shall not exceed fifty for any quarter. [Explanation: “Quarter” means a period of three consecutive months beginning on the 1st of January, the 1st of April, the 1st of July or the 1st of October].

* PDF generated at 10:45 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601339225

Non-compliance

Due 2026-02-20

Code area

6 Working hours are not excessive

Workplace requirement

6.C Provide workers with at least 24 hours of consecutive rest in every 7-day period or, where allowed by national law, two 24 hour periods in every 14-days.

Issue title

487 - Workers do not take off 2 days in 14, regardless of legality in the local context - systemic

Description

During the review of in-time and out-time records of 26 selected sample workers for the sampled months of July 2025, October 2025, and November 2025, it was noted that 3 out of 26 selected sample workers found working 15 days continues without taking weekly off in November 2025 month.

Description (carried over)

During the review of in-time and out-time records of 26 selected sample workers for the sampled months of July 2025, October 2025, and November 2025, it was noted that 3 out of 26 selected sample workers found working 15 days continues without taking weekly off in November 2025 month.

Corrective and preventative actions

It is recommended to the facility ensure all workers receive the 7th day as a weekly off.

Status

Closed (2026-03-13)*

Time given to resolve

30 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 6

Code area 7 →

Corrective and preventative actions (carried over)

It is recommended to the facility ensure all workers receive the 7th day as a weekly off.

Local law reference

In accordance with the Factories Act 1948, Chapter VI Working hours of adults, Section 52 – Weekly holidays, (1) No adult worker shall be required or allowed to work in a factory on the first day of the week (hereinafter referred to as the said day), unless: (a) he has or will have a holiday for a whole day on one of the three days immediately before or after the said day, and (b) the manager of the factory has, before the said day or the substituted day under clause (a), whichever is earlier: (i)delivered a notice at the office of the Inspector of his intention to require the worker to work on the said day and of the day, which is to be substituted, and (ii) displayed a notice to that effect in the factory: Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day.

* PDF generated at 10:45 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601339227

Non-compliance

Due 2026-03-22

Code area

6 Working hours are not excessive

Workplace requirement

6.D Ensure that working hours do not exceed 60 hours in a standard working week for any worker, except 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

Issue title

471 - Total working hours exceed 72 hours per week on a regular basis and over an extended period (but are within the parameters of local law or collective bargaining agreement)

Description

During the review of in-time and out-time records of 26 selected sample workers for the sampled months of July 2025, October 2025, and November 2025, it was noted that 6 out of 26 workers performed weekly working hours exceeding 60 hours per week, including overtime. The maximum weekly working hours recorded were 97 hours.

Status

Closed (2026-03-13)*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 6

Code area 7 →

Description (carried over)

During the review of in-time and out-time records of 26 selected sample workers for the sampled months of July 2025, October 2025, and November 2025, it was noted that 6 out of 26 workers performed weekly working hours exceeding 60 hours per week, including overtime. The maximum weekly working hours recorded were 97 hours.

Corrective and preventative actions

It is recommended to the facility ensure total working hours should not exceed legal as well as ETI requirement of 60 hrs per week.

Corrective and preventative actions (carried over)

It is recommended to the facility ensure total working hours should not exceed legal as well as ETI requirement of 60 hrs per week.

Local law reference

In accordance with Factories Act 1948, Section 64 (4) (i), in making rules under this section, the state Government shall not exceed, except in respect of exemption under clause (a) of sub-section (2) the following limits of work inclusive of overtime: - (i) the total number of hours of work including overtime in any day shall not exceed 10 (ii) the spread over, inclusive of intervals for rest, shall not exceed twelve hours in any one day, (iii) the total number of hours of work in a week, including overtime, shall not exceed sixty (iv) and the total number of hours of overtime shall not exceed fifty for any quarter. [Explanation: “Quarter” means a period of three consecutive months beginning on the 1st of January, the 1st of April, the 1st of July or the 1st of October].

* PDF generated at 10:45 (UTC) on 23 Mar 2026. View this finding on the Sedex platform for live updates and closure details.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	NA
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	56.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	56.0
Maximum number of days worked without a day off in sample	6

← Code area 6 Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures and interaction with workers that the facility has developed a Recruitment policy and Anti -Discrimination policy Doc No: RPPL-POL-02; dated: 01/01/2025 to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures ensuring equal opportunity is provided to both male and female workers in regard to recruitment, compensation, promotion, and access to training. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding Anti-Discrimination. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 6

Code area 8 →

Systems and evidence examined to validate this code section	Current System: 7.A Based on review of wage records and employees' interview, no discrimination as noted in hiring, compensation, access to training, promotion, termination, or retirement. The facility has established policies and procedures sufficient to prevent discrimination at all stages of employment. This includes 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, verified the Anti-Discrimination policy doc no: RPPL-POL-02; dated: 01/01/2025 7.B During the document review and employee interviews, no evidence of discrimination was found at any stage of employment. The facility has established effective policies to prevent discrimination, as verified by the Anti-Discrimination policy doc no: RPPL-POL-02; dated: 01/01/2025 7.C It was noted from review of 26 Out of 26 selected sample workers personal file and interaction with workers that employee is not required to conduct examination of pregnancy, hepatitis B virus and HIV. 7.D The facility does not have any committees; however, procedures are established to communicate directly with workers. - Health & Safety Committee: Recent meeting was conducted on 26/12/2025 & previous meeting conducted on 22/09/2025 with Total members 10 (05 from management and 05 from workers). -Works Committee: Recent meeting was conducted on 09/12/2025 & previous meeting conducted on 16/09/2025 with Total members 10 (05 from management and 05 from workers). - Grievance committee: Recent meeting was conducted on 09/12/2025 & previous meeting conducted on 15/09/2025 with Total members 06 (03 from management and 03 from workers). - POSH committee: Recent meeting was conducted on 22/12/2025 Total members 04 (01 from management, 02 from workers, and 01 External member); verified external member Advocate Mr. Vivek Itwala (Competent reg no - SR/LB/20037) Appointment Letter dated 01/01/2024. - The facility has 01 Suggestion box, which is checked once a month. No complaints/grievance was raised in the grievance register; the register was checked

on 18/12/2025.

Further it was noted from the workers interaction that the mechanism and its procedure is communicated to the workers during training, verified the training records details, also it was noted that the procedure is communicated to the workers in the understandable language and workers have confirmed the same during interview. Verified the grievance/ complaint register as well.

7. E. During document review and management interviews confirmed that the facility has implemented an equity-based approach addressing protected characteristics, including gender and nationality. The company has established a documented plan outlining actions in recruitment, training, and promotion processes.
Evidence reviewed includes:
- Recruitment procedure which requires gender-neutral job advertisements and standardized interview evaluation forms to reduce bias.
- Training matrix showing equal participation of male and female workers & apprentice in skill development programs. Promotion policy outlining objective performance-based criteria applicable to all employees. Verified training records dated 19/10/2025.
- It was further verified through employee interviews that no specific worker Demographics are excluded from the approach.

7.F. No evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 7.

Evidence examined –
•Facility Policy.
•Interaction with management and Employees
•Suggestion box records.

← Code area 6 Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Indian

← Code area 7

Code area 8 →

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed and maintain relevant policy & procedure to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the responsible person for this base code area who has the authority to make decisions and implement the policies and procedures. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 7

Code area 8.A →

Systems and evidence examined to validate this code section

Current System:

8. A. It was noted from document review and interaction with 26 out of 26 selected sample workers that facility has provided appointment letters with includes all terms and conditions of employment and appointment letters provided to workers are in understandable language.

8. B It was noted during interaction with 26 out of 26 selected sample worker and review of employment contracts that the facility meets its legal and contractual obligations in case of dismissal, termination or redundancy.

8. C It was noted from document review and interaction with management that the facility is not using any agency for workforce recruitment however, it engages one subcontractor for security services and recruits workers directly as per company policy.

8.D. Not applicable, as the facility does not engage in apprenticeships, temporary, irregular, or non-standard employment models on the premises. Furthermore, it was noted that the facility uses one subcontracted worker, and there is no indication that this worker is being used to avoid the facility's obligations related to regular employment, regardless of legality.

8. E The Facility meets legal conditions for sub-contracted workers. The facility uses 01 subcontracted workers for security services.

- M/s. CISS Services Limited
Authorized to provide 09 security person.
Agreement dated 01/09/2024, Validity 31/10/2026.
PSARA certificate: PSA/L/35/GJ/2024/JAN/3/2042; Dated: 09/01/2024; valid till: 08/01/2029.

8.F. Facility has not prevented or created unfair barriers for workers in non-permanent roles from applying for or moving into regular, permanent employment if they choose to.

8.G. Not applicable as the facility has not appointed any apprenticeship workers in the premises.

8.H. No evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 8.

Evidence examined –

← Code area 7   Code area 8.A →

- Verified during site tour.
- Worker's appointment letters
- Confirmed during worker’s interview.
- Confirmed from management interaction

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	91.43%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	8.57%
Percentage of workers employed as apprentices, trainees or interns	0.0%

← Code area 8

Code area 8.A →

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 8

Code area 9 →

Management systems

Explanation for management systems grades	Policies and Procedures Grade: Robust Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding sub-contracting and homeworking. No cases of home working or subcontracting found. Resource Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the responsible person for this base code area who has the authority to make decisions and implement the policies and procedures. Communication and Training Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly. Monitoring Grade: Robust The organization effectively monitors procedures, taking action where required to change the policy or procedure. No cases of home working or sub-contracting found.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 8

Code area 9 →

Systems and evidence examined to validate this code section	Current System: 8. A. A It was noted from the facility site visit and review of the process flow chart and inward & outward material records that the facility does not practice Subcontracting & Homeworking. 8. A.B Not Applicable 8. A.C. Not Applicable 8. A.D. No evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 8.A. Evidence examined •Facility site visit •Interaction with management •Interaction with workers

← Code area 8

Code area 9 →

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No It was noted from facility site visit and document review that facility is not using any homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No It was noted from facility site visit and document review that facility is not using any sub-contractor.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a No Harsh and In Human Treatment doc no: RPPL-POL-14; Dated: 01/01/2025 to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding No Harsh and In Human Treatment. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the responsible person for this base code area who has the authority to make decisions and implement the policies and procedures regarding No Harsh and In Human Treatment. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly. Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 8.A

Code area 10.A →

Systems and evidence examined to validate this code section	Current System: 9. A. Based on the interaction with the facility management and employees' interview, it is noted that no case of abuse or discipline has happened in the facility. The facility has a policy and procedure to ensure compliance with No Harsh and Inhuman Treatment policies and procedure doc no: RPPL-POL-14; Dated: 01/01/2025.; approved by Mr. Ramswaroop Thard - Director 9. B. The facility has established policies and procedures to ensure compliance with the prohibition of harsh or inhumane treatment and communicate to all workers a workplace policy prohibiting harsh or inhumane treatment, including gender-based violence and harassment. Verified the Harsh and Inhuman Treatment Policy and procedure doc no: RPPL-POL-14; Dated: 01/01/2025.; approved by Mr. Ramswaroop Thard - Director 9. C. The facility's disciplinary policies are explained to all employees, and all employees are aware of their rights. 9. D. The facility has conducted a risk assessment of policies and procedures As per the identified risk in the process and activities with respect to harassment and inhuman treatment at the workplace, Date: 01/01/2025 9. E. It was noted during document review that the facility provides appropriate training to all relevant workers and supervisors to prevent harsh treatment and has systems to monitor training effectiveness. Training given on 05/09/2025 by, Mr. Ramswaroop Thard - Director to 29 employees. 9. F. It was noted during document review that the facility ensures all workers, including vulnerable groups, receive accessible information and training on preventing harsh treatment, risks, and their rights. Training given on 05/09/2025 by, Mr. Ramswaroop Thard - Director to 29 employees. 9. G. Based on worker interviews and a review of the external security guards' SOP, it was confirmed that body checks are not conducted. Only workers' personal belongings are checked by security personnel. 9. H. The facility has a grievance process in place. All sampled employees were aware of the grievance channels available to them in case of any discrimination or related concerns. This mechanism is accessible to all workers. - Health & Safety Committee: Recent meeting was conducted on 26/12/2025 & previous meeting conducted on 22/09/2025 with Total members 10 (05 from

← Code area 8.A

Code area 10.A →

management and 05 from workers).

-Works Committee: Recent meeting was conducted on 09/12/2025 & previous meeting conducted on 16/09/2025 with Total members 10 (05 from management and 05 from workers).

- Grievance committee: Recent meeting was conducted on 09/12/2025 & previous meeting conducted on 15/09/2025 with Total members 06 (03 from management and 03 from workers).

- POSH committee: Recent meeting was conducted on 22/12/2025 Total members 04 (01 from management, 02 from workers, and 01 External member); verified external member Advocate Mr. Vivek Itwala (Competent reg no - SR/LB/20037) Appointment Letter dated 01/01/2024.

- The facility has 01 Suggestion box, which is checked once a month. No complaints/grievance was raised in the grievance register; the register was checked on 18/12/2025.

9. I. No evidence was found that the site fails to comply with other applicable laws that impose conditions on Code Area 9.

Evidence Examine:
• Facility Policy
• Committee meetings Minutes of meeting review
• Interaction with management and Employees

← Code area 8.A

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	- Works committee - Health & Safety committee - Grievance committee - POSH committee - Suggestion Box 01 - Whistle blower mechanism
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9 Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 9 Code area 10.B →

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures and interaction with workers that the facility has developed environmental policy doc no: RPPL-POL-05; dated: 01/01/2025 to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding to environmental. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the person responsible for this base code area who has the authority to make decisions and implement the policies and procedures regarding environmental. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly. Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 9

Code area 10.B →

Systems and evidence examined to validate this code section

Current System:

10. A.A. It was noted from the review of the environmental policy doc no: RPPL-POL-05; dated: 01/01/2025, confirms the facility is committed to remaining aware of the local, regional, and national environmental laws related to the site, and there are processes in place to ensure that laws are updated and communicated as and when required.

10. A.B It was noted from the review of the following legal documents that the facility was found to comply with its legal laws and regulations related to the environmental Management system.

1. Factory License No: 47513, Issued for 500 workers and 5000 HP, valid till 31/12/2025, issued by Deputy Director Industrial Safety and Health, Valsad. The facility has applied for renewal on 18/10/2025.

2. Pollution Consent order No-AWH58411, Dated - 19/10/2022, Validity 30/06/2027, issued by GPCB.

10. A.C. The facility has conducted an environmental impact assessment, doc name - List of Aspects & Impacts and their evaluation Doc Dated: 01/01/2025.

The facility monitors its environmental impact once a year.

-Ambient Air Quality - test report no: PL/AA/2025/1121021, Dated: 26/11/2025 Test carried out by Precitech Labs Pvt Ltd.

-Lux Monitoring - test report no: test report no: SCL/V/2511/080/002, Dated: 14/11/2025 Test carried out by SAM Calibration Labs Pvt Ltd.

-Noise Monitoring - test report no: test report no: SCL/V/2511/080/010, Dated: 14/11/2025 Test carried out by SAM Calibration Labs Pvt Ltd.

10. A.D. The facility is using hazardous substances in manufacturing, and it was found during the audit that all chemicals are stored adequately.

Workers in the facility handle the following chemicals -
1) offset ink
2) Thiner

Evidence Examined:
• Policy and procedure

← Code area 9

Code area 10.B →

- Legal Documents
- Test Report

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	Nil
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 10.A

Code area 10.C →

Systems and evidence examined to validate this code section

Current System:

10. B.E The facility has conducted an environmental impact assessment. verified the Doc dated: 01/01/2025

10. B.F. It was noted from the review of environmental policy Doc no: RPPL-POL-05; dated: 01/01/2025, and the same is found communicated and endorsed at the highest level, which includes commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders.

10. B.G. It was noted from the document review and interaction with management that the facility has the following targets in place for energy and water conservation:

- Energy Saving Program – LED light installation instead of CFL lights.

- Installation Date: 11/06/2025.

- Previous Power Consumption (CFL 40 W, Qty 40).
  - Power consumption per hour = 1600 W.
  - Power consumption per day = 25600 W.
  - Power consumption per year = 79,87200 W.

- After Power Consumption (LED 20 W, Qty 60).
  - Power consumption per hour = 800 W.
  - Power consumption per day = 12800 W.
  - Power consumption per year = 39,93600 W.

-Energy Savings:
  - Total power saving in a year = 39,93600 W.
  - Percentage saving = 50 % (overall reduction after LED installation).

10. B.H. The facility has a system in place to monitor and record its water, electricity consumption.
Verified the consumption records of (Jan 2025 to Dec 2025).
Electricity Usage: 7633440 KWH
Water Consumption: 1560 (m^3)
Total Hazardous Waste Produced: 0.1 mt

10. B.I. The facility has monitored and mitigated the site's impacts on biodiversity and verified the environmental impact. Doc Dated: 01/01/2025

Evidence examined:

← Code area 10.A

Code area 10.C →

- Policy and procedure
- Legal Documents
- Training records

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Prioritising local suppliers Sustainable material sourcing Switching to renewable energy sources Packaging optimization Zero-waste and recycling protocols
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Not Applicable
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 2 greenhouse gases (GHGs)
Are any of these science-based targets?	No, but we anticipate setting one in the next two years

← Code area 10.B

Code area 10.C →

Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes - Energy Saving Program – LED light installation instead of CFL lights. - Installation Date: 11/06/2025. - Previous Power Consumption (CFL 40 W, Qty 40). - Power consumption per hour = 1600 W. - Power consumption per day = 25600 W. - Power consumption per year = 79,87200 W. - After Power Consumption (LED 20 W, Qty 60). - Power consumption per hour = 800 W. - Power consumption per day = 12800 W. - Power consumption per year = 39,93600 W. -Energy Savings: - Total power saving in a year = 39,93600 W. - Percentage saving = 50 % (overall reduction after LED installation).
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2025)	Previous full calendar year (2024)
Total electricity consumption from non-renewable sources (kWh)	7,633,440	7,251,768
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None

← Code area 10.B

Code area 10.C →

Types of renewable energy used	Other (provide details) No renewable energy used	Other (provide details) No renewable energy used
Total natural gas consumption (kWh)	228	220
Usage of other purchased fuels	0	0
Has the site completed any carbon footprint analysis?	No	No
Water sources	Borewell	Borewell
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,560	1,528.8
Water discharged	Grampanchayat Drain Line	Grampanchayat Drain Line
Water volume discharged (m3)	1,404	1,375.9
Water volume recycled (m3)	0	0
Total waste produced (mt)	163	113
Total hazardous waste produced (mt)	0.1	0.1
Waste to recycling (mt)	163	113
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0

← Code area 10.B

Code area 10.C →

Total product produced (mt)	4,064.2	3,769.7

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 10.B

Management systems

Explanation for management systems grades	Policies & Procedures: Grade: Robust It was noted from the review of facilities' policies and procedures, documents and interaction with workers that the facility has developed a business ethics policy to ensure Workplace Requirements are met. Policies and procedures were appropriate for the site context and are updated every year. Responsibilities were clearly defined in the policies and procedures regarding business ethics. Resources Grade: Robust The facility has appointed Mr. Yatendra Adhaulia - Manager HR as the responsible person for this base code area who has the authority to make decisions and implement the policies and procedures regarding business ethics. Communication & Training: Grade: Robust The facility has conducted training on documented policies and procedures which is according to the documented training schedule, which includes refresher training and induction training regularly. Monitoring: Grade: Robust The facility has developed a system for implementing and monitoring the effectiveness of procedures to meet policy and Workplace Requirements. The organization effectively monitors procedures, taking action where required to change the policy or procedure.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 10.B

Systems and evidence examined to validate this code section	Current System: 10. C. A. No issues were identified with current local legislation, as noted during the interaction with facility management. The facility has communicated the Business Code of Conduct to all employees through induction training. Verified training records given on 12/03/2025 Mr. Ramswaroop Thard - Director. 10. C. B. The facility has conducted a risk assessment to evaluate the effectiveness of its policies and procedures in relation to identified risks such as bribery, corruption, and other fraudulent or unethical business practices. Measures have been implemented to mitigate these risks. Verified Policy Risk Assessment for its Effectiveness dated 01/01/2025 confirmed that training on company policies was provided to all workers and management on 12/03/2025 by Mr. Ramswaroop Thard - Director. 10. C. C. The facility is aware of and complies with all applicable fiscal legislative requirements, including third-party financial audits where required. 10. C. D. The facility has communicated Supplier code of ethics policy to all suppliers via email on 13/12/2025. (Policy doc -RPPL-POL-15). 10. C. E. The facility provides business ethics training to relevant staff in high-risk roles such as sales, purchasing, and logistics. 10. C. F. The facility has developed Whistle Blower mechanism that effectively allows. confidential and anonymous reporting, monitoring and investigation of any fraudulent or unethical business practices without fear of reprisals towards the reporter. 10. C. G. The facility has a data privacy policy document doc no: RPPL-POL-1.10 Dated: 01/01/2025. 10. C. H. It was noted from interaction with facility management and review of legal registers that facility has not been fined by and legal authority. 10. C. I. It was noted from the document review and interaction with the facility management that the facility has took this land on lease bases from M/s. Rishika packing to Rajshree polypack limited. Facility holds land clearance documents with them. Verified lease agreement No: 3639; dated: 15/12/2020. Validity: 10 yrs from the date of agreement. The facility is paying tax to Grampanchayat Athal Silvassa, Verified Tax payment

← Code area 10.B

receipt. no: 2431 (860); Dated: 25/03/2025. Period 2024-25.

Additionally, facility hold Land Policy document no: RPPL-POL-16; Dated: 01/01/2025

Evidence examined:
- Policy manual
- Interaction with management
- Training records
- land agreement

← Code area 10.B

10.C. Business ethics

Data points

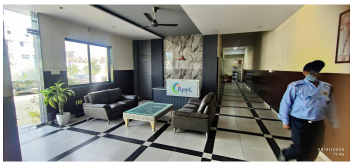
Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	The facility does not provide any certified anti-bribery Management Systems for the site.

← Code area 10.C

Attachments

Building view.jpg

PPE storage area.jpg

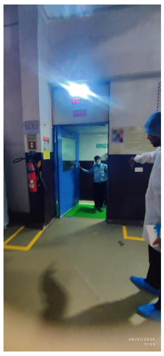


reception area.jpg

Security cabin.jpg

Toilets.jpg

Urinal pots.jpg

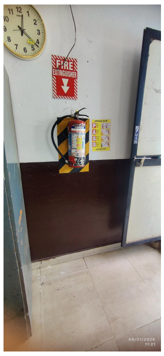


Emergency exit.jpg

Lux light.jpg

Drinking water station.jpg

Production area.jpg



fire extinguisher.jpg

Electrical control panel area.jpg

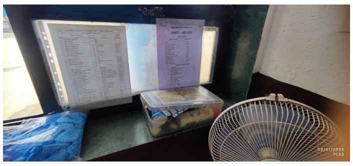
list of holidays displayed.jpg

No child labour board displayed.jpg

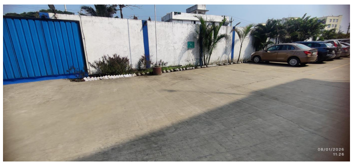
Chemical storage area.jpg

Facility entrance gate.jpg

[RM store.jpg]

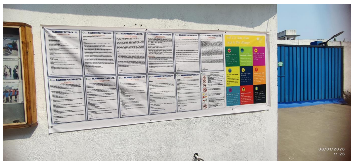


[First aid box.jpg]



[assembly point.jpg]

[transformer.jpg]



[Policy and procedure displayed.jpg]

[Lunch area.jpg]

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