



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC423060906	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS423060908	
Business name (Company name):	Newage Apparels Ltd.			
Site name:	Newage Apparels Ltd			
Site address:	Holding – 06/66/01, Road- 11, Block – L, Ward- 06, Nischintapur, Purbo Norshingpur, Ashulia, Savar, Dhaka – 1341 Dhaka 1341 BD	Country:	BD	
Site contact and job title:	Md. Towfiq Ullah Khan / Deputy Manager- HR & Sustainability			
Site phone:	09612639243	Site e-mail:	nalsupport@newage-group.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2024-03-24			

Audit Company Name:
GSCS International Ltd

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

## Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents  
**2-Pillar SMETA Audit**
  - ETI Base Code
  - SMETA Additions
    - Universal rights covering UNGP
    - Management systems and code implementation,
    - Responsible Recruitment
    - Entitlement to Work & Immigration,
    - Sub-Contracting and Home working,**4-Pillar SMETA**
  - 2-Pillar requirements plus
  - Additional Pillar assessment of Environment
  - Additional Pillar assessment of Business Ethics
  - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Akil Mahmud	APSCA Number:	32200701
Additional Auditors:	Md. Abdullah Al-Mamun		32200120
	Md. Tanvir Hasan Khan		32200442
	Mashiyat Semonti		32200700
Date of declaration:	2024-03-24		

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

Site Representation	
Full Name:	Md. Towfiq Ullah Khan
Title:	Deputy Manager- HR & Sustainability
Date of declaration:	2024-03-24
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i>  <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i>  <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
	None

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<a href="#">0A - Universal rights covering UNGP</a>			0	0	0	
<a href="#">0B - Management systems and code implementation</a>			0	0	2	GE - ZAF600411658 GE - ZAF600411659
<a href="#">1 - Freely chosen employment</a>			0	0	0	
<a href="#">2 - Freedom of association and right to collective bargaining are respected</a>			0	0	0	
<a href="#">3 - Working conditions are safe and hygienic</a>	3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §2 §3 §4 §5 §6	7	0	0	NC - ZAF600411647 NC - ZAF600411649 NC - ZAF600411650 NC - ZAF600411651 NC - ZAF600411652 NC - ZAF600411653 NC - ZAF600411657
<a href="#">4 - Child labour shall not be used</a>			0	0	0	
<a href="#">5 - Living wages are paid</a>			0	0	3	GE - ZAF600411656 GE - ZAF600411661 GE - ZAF600411662
<a href="#">6 - Working hours are not excessive</a>	6.1 6.1	§7 §8	2	0	0	NC - ZAF600397479 NC - ZAF600411660
<a href="#">7 - No discrimination is practiced</a>			0	0	0	
<a href="#">8 - Regular employment is provided</a>	8.1	§9	1	0	0	NC - ZAF600411654
<a href="#">8A - Subcontracting and homeworking</a>			0	0	0	
<a href="#">9 - No harsh or inhumane treatment is allowed</a>			0	0	0	
<a href="#">10A - Entitlement to work and immigration</a>			0	0	0	
<a href="#">10B2 - Environment 2-pillar</a>	10.B2.1 10.B2.1	§10	2	0	0	NC - ZAF600411648 NC - ZAF600411655
<a href="#">10B4 - Environment 4-pillar</a>			0	0	0	
<a href="#">10C - Business ethics 4-pillar</a>			0	0	0	

## Local Law Issues

Issue	Description
§1	In accordance with The Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1):No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: (a) Power generation; (b) Energy transmission; (c) Energy distribution and marketing; (d) Energy supply; and (e) Energy storage

§2	"In accordance with Bangladesh Labour Rules 2015, Chapter-6, Section-55 (11): 11) The members of fire fighting team, rescue team and first aid team must wear the prescribed uniform while conducting their respective operations and the dress code shall be as follows: a) Fire fighting team: Yellow colored apron, in rear of which 'FIRE' shall be written in red color. b) Rescue team: Yellow colored apron, in rear of which 'RESCUE' shall be written in red color. c) First aid team: White colored apron, in rear of which 'FIRST AID' shall be written in red color."
§3	"In accordance with The Bangladesh Labor Act 2006, Chapter- 6, Section – 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment. In accordance with Bangladesh Labor Law 2006, Section 72 (c): 2 passages and stairways shall be clean, wide and clear of all obstructions 3 [.] and 4 [(d) an employer may, for overall safety of the factory and workers, bring the passages of movements, stairs, gates, godowns and common utility area of the place of work under close circuit camera."
§4	In accordance with The Bangladesh Labour Act, 2006, Section 79 (e) & The Bangladesh Labour Rules 2015, Rule 68 (10):
§5	In accordance with The Bangladesh Labor Act, 2006, Section 63 (1- d, 3): 1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced- (iii) every dangerous part of any machinery:
§6	In accordance with Bangladesh Labor Rules 2015 section 77(1) and the Bangladesh Labor Rules 2022 Amendment section 30: Provided further that if the workers of an establishment work in shifts, there will be a certified medical assistant instead of the doctor registered for the night shift.
§7	Bangladesh Labour Law 2006, Section 100 : Daily working hour.No adult worker shall ordinarily work or be required to work in an establishment for more than 8 (eight) hours in a day: Provided that subject to the provisions of section 108, any such worker may work in an establishment upto 10 (ten) hours also in a day.and 102 (2): (1) No adult worker shall ordinarily work or be required to work in an establishment for more than 48 (forty-eight) hours in a week. (2) Subject to the provisions of section 108, an adult worker may work for more than 48 (forty-eight) hours also in a week: Provided that the total working hours of such worker shall not exceed 60 (sixty) hours in a week, and on the average 56 (fifty-six) hours per week in a year: Provided further that the total additional working hours of a worker employed in a road transport establishment shall not exceed 150 (one hundred and fifty) hours in a year: Provided further that the Government may, in the cases of some particular industries, under conditions imposed by order in writing, relax the provisions of this section or exempt from the provisions of this section at a time for a period of not exceeding 6 (six) months, if it is satisfied that in the public interest or in the interest of economic development such relaxation or exemption is necessary.

§8	Bangladesh Labour Law 2006, Section 100 : Daily working hour.No adult worker shall ordinarily work or be required to work in an establishment for more than 8 (eight) hours in a day: Provided that subject to the provisions of section 108, any such worker may work in an establishment upto 10 (ten) hours also in a day.and 102 (2): (1) No adult worker shall ordinarily work or be required to work in an establishment for more than 48 (forty-eight) hours in a week. (2) Subject to the provisions of section 108, an adult worker may work for more than 48 (forty-eight) hours also in a week: Provided that the total working hours of such worker shall not exceed 60 (sixty) hours in a week, and on the average 56 (fifty-six) hours per week in a year: Provided further that the total additional working hours of a worker employed in a road transport establishment shall not exceed 150 (one hundred and fifty) hours in a year: Provided further that the Government may, in the cases of some particular industries, under conditions imposed by order in writing, relax the provisions of this section or exempt from the provisions of this section at a time for a period of not exceeding 6 (six) months, if it is satisfied that in the public interest or in the interest of economic development such relaxation or exemption is necessary.
§9	In accordance with and The Bangladesh Labour Act, 2006, Chapter-2, Section 5: No employer shall employ any worker without giving such worker an appointment letter and every such employed worker shall be provided with an identity card with his photograph.
§10	The Bangladesh Labour Act, 2006, Section 54: Effective arrangements shall be taken in Every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.

## Site Details

Site Details		
Company Name	Newage Apparels Ltd.	
Site Name	Newage Apparels Ltd	
GPS location (if available)	GPS Address:	Holding No 06/66/1, Road No 11, Block -L, Ward 06, Nischiatapur, East Norshinghpur, Ashulia, Savar, Dhaka-1341, Bangladesh
	Coordinates:	Latitude: 23.92557 Longitude: 90.30825
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License No. 9658/Dhaka issued by Bangladesh Government, which is valid till June 30, 2024. Trade License No. 022493, is issued by Yearpur Union Parishad, which is valid till June 30th, 2024. Fire License No. DD/Dhaka/18418/2004 issued by Bangladesh Fire Service & Civil Defense Authority, which is valid till June 30, 2024. Certificate of Incorporation No. C-21618(25)/92, with life time validity started from January 11, 1992.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The factory specialized in the manufacture of knit, woven and headwear garments. The main production process is Cutting, Printing, Embroidery, Sewing, Finishing & Packing.	



<p>Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<p>Newage Apparels Ltd. was located at Holding No 06/66/1, Road No 11, Block -L, Ward 06, Nischintapur, East Norshinghpur, Ashulia, Savar, Dhaka-1341, Bangladesh. The site was established in year 1992. This periodic audit was conducted by four auditors, assessed the factory operation against ETI base code and Local law requirements on a sampling basis in one day. The scope of this audit was based on 2-Pillar SMETA systems. The factory specialized in the manufacture of knit, woven and headwear garments. The main production process is Cutting, Printing, Embroidery, Sewing, Finishing, Packing. The total factory area was 224803 square feet and the production area was 179698 square feet. The factory has no obvious peak season. Production capacity is around 480000 pieces per month for knitted garments, 650000 pieces per month for woven garments and 220000 pieces per month for headwear. In view of facilities, the factory has 06 buildings &amp; 09 sheds. Total worker of the factory is 3372 (1247 male and 2125 female) workers and 376 staffs. All workers were local. Weekend of the factory was Friday. The general working hours for Cutting, Sewing, Finishing &amp; Packing section in the factory is operating in one shift e.g. starts from 08:00 to 17:00 with 60 minutes lunch break from 13:00 to 14:00. The printing and embroidery section in the factory is operating in two shifts e.g. Shift 1 from 08:00 to 17:00 and Shift 2 from 20:00 to 5:00 with 60 minutes break in each shifts. Security has three shifts per eight hours each with roster schedule of break &amp; weekend. Auditors entered the facility at 09:05 on 24th March 2024 and conducted an opening meeting with facility management per the ETI Base Code. Worker representative was present in the meeting and they assured full co-operation to this audit. Based on documents review, employees' interview and site tour, the positive and negative findings are as follows: 1. The factory provided company registration: C- 21618(25)/92, with life time validity started from January 11, 1992. 2. All employees were recruited directly by the factory. The all employees provided the copy of their personal ID cards, birth certificate, and educational certificate (if any) and characterize certificate to the factory before they started work. Both copy of ID cards, birth certificate, educational certificate, characterize certificate and latest individual photos are kept properly in their personnel files. 3. The emergency evacuation floor plan was posted on the wall of each floor. 4. No child labor or young worker was found during audit. 5. Neither migrant workers nor agency workers were found in the facility. 6. No forced labor, discrimination &amp; harsh or inhumane treatment were found during the audit. 7. Suggestion box was available for employees to complain or feedback their working condition. Also, they could communicate with their supervisors, top management directly and through worker representatives. 8. The factory conducted fire drill that included fire extinguishers exercise and evacuation exercise once in every two months at production area. 9. Md. Aktaruzzaman (Asst. Fire Safety Officer) is assigned to be responsible for Health &amp; Safety. 10. Total 62 workers- [Twenty two (22) individual workers and Forty (40)- eight groups of five workers] were interviewed in the confidential room. Employees' attitude was positive and polite during the audit. And employees showed the favorable attitude toward the factory via workers' interview. 11. Drinking water and toilet were available and accessed easily. 12. Per payroll record review and interviews with management all workers were paid by monthly wage system. Wages were paid once a month within first 7 working days of the following pay period. All the employees' wages were paid by bkash. No delay of wage was identified through documents review, worker interview and management interview. A copy of the CAP was</p>
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	given to Md. Towfiq Ullah Khan (Deputy Manager- HR & Sustainability).
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Structure and number of buildings	<b>Building Name:</b>		Building 1
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	Basement	Accessories store, Fabric store, Fabric inspection room, Finished goods store, carton store, Maintenance room, Idle machine store, Cutting	Commonly used with another two sister concern named Newage Garments Ltd. and Keilock Newage BD Ltd.
	1st floor	Used by another sister concern named Keilock Newage BD Ltd.	Used by another sister concern
	2nd floor	Used by another sister concern named Newage Garments Ltd.	Used by another sister concern
	3rd floor	Packing and Finishing section	Nil
	4th floor	Sewing section, Finishing section, Spot room, Packing section, Office	Nil
	5th floor	Cutting section, Sewing section, Packing section, Finishing section, Sample section	Nil
	<b>Building Name:</b>		Building 2
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	Ground floor	Sewing section, Cutting section, Finishing section, Spot room, Packing section, Accessories store, Inspection room, Dining, Medical room, Child care, Wash garments keep area	Nil
	1st floor	Sewing section, Cutting section, Finishing section, Spot room, Packing section, Finished goods store, Dining, Canteen	Nil

<b>Building Name:</b>		Building 3
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Fire control & Captive generator building	Nil
1st floor	Engineering office, Sub station room, EGB	Nil
<b>Building Name:</b>		Building 4
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Diesel generator	Nil
<b>Building Name:</b>		Building 5
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Fire pump room & Boiler room	Nil
<b>Building Name:</b>		Building 6
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	ATM booth	Nil
<b>Building Name:</b>		Shed 01
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Printing & Embroidery shed	Nil
<b>Building Name:</b>		Shed 02
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	ETP	Nil
<b>Building Name:</b>		Shed 03
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Staff Canteen	Nil
<b>Building Name:</b>		Shed 04
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	NAL Compressor room	Nil
<b>Building Name:</b>		Shed 05
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Printing compressor room	Nil
<b>Building Name:</b>		Shed 06
<b>Floor</b>	<b>Description</b>	<b>Remark</b>
Ground floor	Wastage area	Nil

	<b>Building Name:</b>		Shed 07
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	Ground floor	Parking, Idle machine area	Nil
	<b>Building Name:</b>		Shed 08
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	Ground floor	Lubricant store	Nil
	<b>Building Name:</b>		Shed 09
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	Ground floor	Kitchen shop	Nil
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No large or any other structural integrity issues found during the audit.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site has a structural engineering evaluation from the RSC. Last inspection was conducted on 14th February 2024.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season			
Process overview	The factory specialized in manufacturing of all kinds of knit items. The main production process is Cutting, Printing, Embroidery, Sewing, Finishing & Packing. The production capacity is around 1,350,000 Pcs per month (Woven-480,000; Knit-650,000; CAP-220,000 Pcs/month).		
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None		
Please give details:	Facility has formed a worker participation committee by election.		
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		

Were all site provided accommodation buildings included in this audit

Yes  No

Please give details:

Not applicable as no accommodation was provided.

**Audit Parameters**

Audit Parameters		
Time in and time out	Day 1	
	In	09:05
	Out	16:00
Audit type:	PERIODIC	
Was the audit announced?	SEMI_ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Md. Towfiq Ullah Khan / Deputy Manager- HR & Sustainability	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No union present in the facility but the facility has formed workers committee. As per local law if there is any worker committee present in the facility then union is not mandatory. However, the worker representative was present at the opening meeting.		
<i>Reason for absence during the audit</i>	No union present in the facility but the facility has formed workers committee. As per local law if there is any worker committee present in the facility then union is not mandatory. However, the worker representative was present during audit.		
<i>Reason for absence at the closing meeting</i>	No union present in the facility but the facility has formed workers committee. As per local law if there is any worker committee present in the facility then union is not mandatory. However, the worker representative was present at the closing meeting.		



## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	1247	0	0	0	0	0	0	1247
Worker numbers - female	2125	0	0	0	0	0	0	2125
Total	3372	0	0	0	0	0	0	3372
Number of Workers interviewed - male	25	0	0	0	0	0	0	25
Number of Workers interviewed - female	37	0	0	0	0	0	0	37
Total - interviewed sample size	62	0	0	0	0	0	0	62

Nationalities Structure	
Nationality of Management	Bangladeshi
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Bangladeshi approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as there was no obvious peak season for the facility.
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 0%
	Salaried: 100%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: No other payment cycle

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	40 (08 groups of 05 workers)
Number of individual interviews:	Male: 10 Female: 12
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No complaint was raised by any sample workers against facility because they were happy with their working environment.
What did the workers like the most about working at this site?	Facility workplace condition is comfortable, timely payment of wages and benefit. Good relationship with facility management.
Any additional comment(s) regarding interviews:	Nothing to report
Attitude of workers to hours worked:	It was noted through worker interview that the total working hour is within standard and overtime is fully voluntary.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Attitude of workers:</p> <p>The factory allowed the auditors from GSCS International Ltd. to conduct confidential worker interviews. The workers were chosen freely without any influence by the factory management: 62 workers (08 groups of 05 workers and 22 individuals) were randomly selected by auditor from different sections for interview. The workers showed a cooperative attitude during the interview process. Based on worker's interview, they expressed their positive attitude to the management and payment system. All workers were satisfied with working conditions and benefits. The effective evidences were collected by workers interview; the following information was summarized: 1. Workers said that they were not required to lodge "deposits" or their identity cards at the recruitment and were free to leave or resign after reasonable notice. 2. All interviewees reflected that workers could complain to management or worker committee representatives directly or by writing letters through suggestion box and all interviewed workers were aware of worker representatives. 3. All workers stated that factory provided induction training for new workers and regular safety training for all workers. Workers said they had participated in fire drills at the production area every month. 4. All interviewees confirmed that the factory had checked their ID cards or birth certificate to verify their ages. They never seen or heard any child labour less than 18 years old employed in this factory. 5. All interviewed workers said that they were paid by monthly wage system. Wages were paid once a month within first 07 working days of the following pay period. All the employees' wages were paid by bKash. No delay of wage was identified through worker interview and management interview. 6. The general working hours for Cutting, Sewing, Finishing &amp; Packing section in the factory is operating in one shift e.g. starts from 08:00 to 17:00 with 60 minutes lunch break from 13:00 to 14:00. The printing and embroidery section in the factory is operating in two shifts e.g Shift 1 from 08:00 to 17:00 and Shift 2 from 20:00 to 5:00 with 60 minutes break in each shifts. Security has three shifts per eight hours each with roster schedule of break &amp; weekend 7. The interviewed workers said that they could obtain the job based on their working experiences and abilities. The female workers or male workers' wages were calculated at the same for the same work based on their performance.</p>
<p>Attitude of worker's committee/union reps:</p> <p>During Interview, worker committee representative expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary. No negative information was observed during the audit.</p>
<p>Attitude of managers:</p> <p>The management was found to be well versed with the requirements of social audit, management was very cooperative and transparent during the course of the audit. They were receptive towards findings. The management approach was found to be positive.</p>

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

**0A: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Md. Towfiq Ullah Khan, Deputy Manager (HR & Sustainability).
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the report.
- The facility has policy and procedures for human rights.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

**Evidence examined:**

1. Documentation files were reviewed. It stipulates complying with Human Rights, written policies and procedure that being provided individually to employees.
2. Letter of Authorization on implementing Human Rights
3. Impact for Human Rights assessment report
4. Management interview and employee interview

**Any other comments:**

None

Policy statement that expresses commitment to respect human rights?

Yes    No

Please give details:

The facility had posted the policy about respecting Human Rights in the policy board stated that child labour shall not be used, Forced Labour shall not be used, no discrimination is practised, no harsh or inhumane treatment is allowed, disciplinary action taken, working hours etc.

Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All of the policies are included in worker's manual.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Md. Towfiq Ullah Khan, Deputy Manager (HR & Sustainability).
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had established a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter by means of suggestion box, making the contact way of management in policy board and public areas in the facility.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility established an effective data privacy procedure for workers' information to protect the workers' privacy information.
<b>Measuring Workplace Impact</b>	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 3.5% This year 2.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	2.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 5.0% This year 4.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	4.0%

Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility maintains accident record as per prescribed format of Law. Facility provides accident statement in to the labour ministry (authority) as required by law.	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	1.0%
	This year	1.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	1.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	35.0%
	12 month	40.0%

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

**OB: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Responsibility for meeting the legal and client code requirements is taken by Md. Towfiq Ullah Khan, Deputy Manager (HR & Sustainability).
- The facility communicated this code of conduct (COC) to the suppliers and employees.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- The facility conducts orientation training for all new employees.
- The facility did not conduct training for the employees on ETI base code.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.

**Evidence examined:**

- Employee handbook
- Facility Code of Conduct (COC)
- All policies of facility
- Legal license (Factory, Fire, Trade, Incorporation)
- Internal audit records
- Management employee training, training attendance record
- Meeting records

**Any other comments:**

None

**Management Systems**

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  It was noted through documentation review, facility has policies and procedures for reduce the risk of forced labour, child labour, discrimination, harassment & abuse.



<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Through documents review and workers interview, the written policies (no forced labour, no child labour, non-discrimination, working hours, health &amp; safety, harassment and abuse) were communicated to the workers as much as factory mid-level management &amp; workers were informed through PA system and notification board.</p>
<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All the managers and workers in the facility have received orientation training where standards for forced labour, child labour discrimination are covered. However, the facility did not provide anti-harassment training to their workers.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Training records were found including picture and attendance sheet.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has internationally recognized system certification like WRAP which conduct on 25 February 2024.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Facility has a dedicated Human Resources department consisting 12 members and is headed by Md. Towfiq Ullah Khan, Deputy Manager (HR &amp; Sustainability).</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Responsibility for meeting the legal and client code requirements is taken by Md. Towfiq Ullah Khan, Deputy Manager (HR &amp; Sustainability).</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory had adopted a policy decision where by all employees of the company will be required to maintain confidentiality with regard to the affairs of the company &amp; it's greater.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has an effective key control procedure to keep the information confidential.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility conducted risk assessment evaluates effectiveness of every policy and procedure department wise.</p>

<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has an internal system to raise the issue found the risk assessment and to implement the way of reduction it.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility established a policy/code which requires labour standards of its own suppliers.</p>
<p><b>Land Rights</b></p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site has all required land rights licenses and permissions.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has anti- corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not Applicable</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility land is owned by the facility owner.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not Applicable as the facility are using own land and buildings.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>It was noted through land ownership agreement review and management interview that the facility did not go through illegal appropriation of land for facility building.</p>

Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600411658	
Clause	0B - Management Systems and code Implementation	
Issue Title	14 - Excellent Human Resource (HR) policies and practices in place	
Subcategory	Site's Management systems & Monitoring	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The company has provide fair shop facility to the all workers they can purchase products with special discounts and credit options.	
Evidence	Documents review, workers & management interview.	

Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600411659	
Clause	0B - Management Systems and code Implementation	
Issue Title	14 - Excellent Human Resource (HR) policies and practices in place	
Subcategory	Site's Management systems & Monitoring	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility arranges annual picnic & cultural program for all employees free of cost.	
Evidence	workers & management interview	



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

**1: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The factory has a policy which prohibits forced labour, and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificate) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labor.
- The above was confirmed through management and employees' interview.

**Evidence examined:**

1. Personnel files
2. Factory policy, rules and regulations, and training records etc.
3. Resignation records
4. Factory rules
5. Employee handbook
6. Management and workers interview

**Any other comments:**

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:  Facility has a policy mentioning workers are free to terminate employment from the facility with '02 months' notice period.

<p>If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Not applicable as the yearly turnover of the factory was less than £36m.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No evidence of any restrictions on workers' freedoms to leave the site at the end of the workday.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The facility established a policy about forbidden of forced / trafficked / bonded labour and implemented strict management system to control the risk of forced / trafficked / bonded labor in its supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory had provided training and awareness session to all employees to reduce the risk of forced / trafficked labor.</p>

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

**2: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union in the facility but there is a Workers Participation Committee formed by election process.
- Meeting minutes are posted on the notice board and recorded in a register.
- There are 17 members from the worker's side and 5 from the management side with a total of 22 members.
- PC members were equally treated to other workers.
- PC members were allowed to carry out their duties within working hours without affecting their pay.

**Evidence examined:**

1. Freedom of association policy review
2. Facility management interviews
3. Worker interview
4. Complain box register (Suggestions from the complaint box and actions taken)
5. Participation Committee formation records review and its meeting records review, Grievance handling policy & procedure.

**Any other comments:**

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Workers Participation Committee in the facility.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: The factory management has provided a complaint box in the toilet area through which workers can raise their suggestions/complaints. Workers can also approach the management directly for any grievances that are confirmed by the interviewed workers.	

Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Workers Participation Committee in the facility which was formed through election process.
Name of union and union representative, if applicable:	N/A
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers Participation Committee in the facility which was formed through election process.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All workers are well aware of their representatives and their activities.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-10-19
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The facility conducted the last workers' committee meeting on 15.02.2024. Efficient exchange of committee members, resolution of issues raised in previous meetings & discussion about how to resolve the health & safety issues, factory improvements & developments and responsibilities of PC Committee members & discussion about festival leaves etc. Meeting minutes were shared with all workers by posting the meeting minutes on the communication board.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



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

**3: Compliance Requirements**

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

**Current Systems and Evidence Examined**

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

**Current Systems:**

**1. General Health and Safety Management:**

- Md. Aktaruzzaman - Fire Safety Officer looks after Health & Safety issues for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets 233 (98 for male and 135 for female) segregated by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are every three months Health and Safety meeting held. Last meeting was held on 15th February 2024.

**2. Fire Safety:**

- Sufficient assembly area was found in front of the facility building.
- Firefighting equipment were adequate and checks were up-to-date.
- The facility management posted the evacuation plans on production floors with local language.
- Public Address System and Fire Alarm System were available in all areas.

**3. Electrical, Machine & Fire Safety:**

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
- Facility maintains a scheduled maintenance plan for doing maintenance of all machines.

**4. Chemical Safety:**

- Facility uses chemical only for the spot removing from the garments and provided training and Personal Protection Equipment.

**5. Medical Services:**

- There were 42 first aid boxes and 84 first aid provider in the facility.
- Facility has appointed 02 doctor & 01 nurse and 01 medical assistant in medical room are appointed for medical treatments of the employees who were available in working time of the facility. They also arranged monthly first aid training with first aiders. Total 3 medical room for three different factories.
- Facility has a medical room.

**6. Training provided:**

- a. New workers training
- b. Health & Safety Training
- c. Fire Safety training
- d. Firefighting Training
- e. First Aid training
- f. PPE training
- g. Machine Safety

**Evidence examined:**


- 1.License review (Fire license, Trade license, Factory license)
- 2.Building approval plan and layout approval plan
- 3.Group insurance
- 4.Drinking water test report
- 5.Injury record and analysis report
- 6.Machine and electric maintenance record
- 7.Risk assessment report
- 8.Training records (Fire training, First aid training)
- 9.Fire drill record
- 10.Health and safety committee register
- 11.Fire equipment and electric equipment checking record

**Any other comments:**

None

<p>Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory had adopted health &amp; safety policy which covers PPE, machine safety device, fire safety (fire extinguisher, freighting equipment, hose pipe etc.), emergency pathway, evacuation drill, housekeeping, first aid, electrical safety etc.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility provides workers manual to the workers where all the policies and applicable government law are included.</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>There were no structural additions without prior permits/ inspections.</p>
<p>Are visitors to the site informed on H&amp;S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site kept dedicated PPE(s) for visitors. While any visitor visits in the factory generally, they brief the visitor about H&amp;S policy and provide PPE(s) as and when required.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a medical room dedicated for workers with doctor &amp; nurse. The room does not meet the legal requirements.</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has 02 doctor &amp; 1 nurse and 1 medical assistants in medical room are appointed for medical treatments of the employees. However, the facility did not appoint any medical assistant for the night shift workers. Note that there are 28 workers work in night shift.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory does not provide any transport facility to the distant workers and it is fit for the purpose, safe, maintained and operated by competent persons e.g. buses.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not applicable as the factory did not provide living space to the workers.</p>

<p>Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Workers risk assessment is done on a monthly basis according to the training schedule.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility meets all the legal obligations on environmental requirement including required permits for use and disposal natural resources like water etc.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory did not use banned chemicals and follows the entire customer requirement on environmental standard.</p>






Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411647	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Govt delay	
Local law issue	In accordance with The Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1):No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: (a) Power generation; (b) Energy transmission; (c) Energy distribution and marketing; (d) Energy supply; and (e) Energy storage	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted through document review, facility tour and management interview that the facility has 9 generators among them 3 generators are newly installed. Facility has generator license for previous 6 generators with capacity of 3.5 MW which was expired on 21.02.2024. Noted that the facility has already applied for the generator license for all the 9 generators on 16.01.2024 but didn't receive any response yet.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
	 <a href="#">Expired generator license.pdf</a>	

Actions	It is recommended that the facility obtain updated generator license from concerned authority.	
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Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411649	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	175 - Workers are not given appropriate fire safety, fire prevention and/or evacuation training	
Subcategory	Fire Safety - Licenses, Inspections & Training	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of knowledge of the legal requirements	
Local law issue	<p>"In accordance with Bangladesh Labour Rules 2015, Chapter-6, Section-55 (11): 11) The members of fire fighting team, rescue team and first aid team must wear the prescribed uniform while conducting their respective operations and the dress code shall be as follows: a) Fire fighting team: Yellow colored apron, in rear of which 'FIRE' shall be written in red color. b) Rescue team: Yellow colored apron, in rear of which 'RESCUE' shall be written in red color. c) First aid team: White colored apron, in rear of which 'FIRST AID' shall be written in red color."</p>	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During plant tour it was noted that 50% of fire fighter, rescuer & first aider were not wearing identifiable dress during the working time in the floor at cutting section, sewing section, finishing section & packing section of all over the factory.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should ensure that the firefighters, rescuers & first aider are	



	wearing addressable uniforms and provide training to them.	
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Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	 <a href="#">Aisle obstructed-05.JPG</a>   <a href="#">Aisle obstructed-04.JPG</a>   <a href="#">Aisle obstructed-03.JPG</a>   <a href="#">Aisle obstructed-02.JPG</a>   <a href="#">Aisle obstructed-01.JPG</a>
Reference	ZAF600411650	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	207 - Isolated occurrence of blocked fire exits	
Subcategory	Fire Safety - Fire exits	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness & monitoring	
Local law issue	"In accordance with The Bangladesh Labor Act 2006, Chapter- 6, Section - 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment. In accordance with Bangladesh Labor Law 2006, Section 72 (c): 2 passages and stairways shall be clean, wide and clear of all obstructions 3 [:] and 4 [(d) an employer may, for overall safety of the factory and workers, bring the passages of movements, stairs, gates, godowns and common utility area of the place of work under close circuit camera."	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During floor visit, it was observed that 4 out of 10 aisles were partially obstructed by production materials, machine, table & cartoons in the cutting section, sewing section, finishing section & packing section on the ground floor & 1st floor at building-02.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should ensure	

	the pathway are free from any obstacle and ensure for the safe evacuation in case of emergency.	
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Non-Compliance	Evidence																												
<p><a href="#">[Back to findings summary]</a></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="background-color: #f2f2f2;">Non-Compliance</th> </tr> </thead> <tbody> <tr> <td style="width: 20%;">Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600411651</td> </tr> <tr> <td>Clause</td> <td>3 - Working Conditions are Safe and Hygienic</td> </tr> <tr> <td>Issue Title</td> <td>183 - No fire fighting equipment on site</td> </tr> <tr> <td>Subcategory</td> <td>Fire Safety - Fire Fighting Equipment</td> </tr> <tr> <td>New or carried over?</td> <td> <input checked="" type="checkbox"/> New                             <input type="checkbox"/> Carried Over                         </td> </tr> <tr> <td>Root cause</td> <td> <input type="checkbox"/> Training                             <input checked="" type="checkbox"/> System  <input type="checkbox"/> Costs                             <input type="checkbox"/> Lack of workers  <input checked="" type="checkbox"/> Other                         </td> </tr> <tr> <td>Root cause - Other</td> <td>Lack of knowledge of legal requirements</td> </tr> <tr> <td>ETI code</td> <td>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</td> </tr> <tr> <td>Explanation to the non compliance</td> <td>During floor visit &amp; management interview, it was noted that no fire equipments install in the diesel generator room at building- 04.</td> </tr> <tr> <td>Follow up method</td> <td> <input type="checkbox"/> Follow up audit                             <input checked="" type="checkbox"/> Desktop audit                         </td> </tr> <tr> <td>Timescale</td> <td> <input type="checkbox"/> Immediate                             <input checked="" type="checkbox"/> 30 days                             <input type="checkbox"/> 60 days  <input type="checkbox"/> 90 days                             <input type="checkbox"/> 120 days                             <input type="checkbox"/> 180 days  <input type="checkbox"/> 365 days                             <input type="checkbox"/> Other                         </td> </tr> <tr> <td>Actions</td> <td>It is recommended that the facility shall ensure that they shall install all the fire equipment's in the diesel generator room.</td> </tr> </tbody> </table>		Non-Compliance		Status	OPEN	Reference	ZAF600411651	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	183 - No fire fighting equipment on site	Subcategory	Fire Safety - Fire Fighting Equipment	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	Root cause - Other	Lack of knowledge of legal requirements	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	Explanation to the non compliance	During floor visit & management interview, it was noted that no fire equipments install in the diesel generator room at building- 04.	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It is recommended that the facility shall ensure that they shall install all the fire equipment's in the diesel generator room.
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Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411652	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	In accordance with The Bangladesh Labour Act, 2006, Section 79 (e) & The Bangladesh Labour Rules 2015, Rule 68 (10):	 <p><u>Chemical stored without maintaining the compatibility chart.</u>JPEG</p>
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted during facility tour that 12 printing chemical containers were stored without printing secondary containment & without maintaining the instruction according to the compatibility chart in the chemical store located at ground floor of shed-1.	 <p><u>Chemical stored without secondary containment.</u>JPEG</p>
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should store chemicals with secondary containment according to the compatibility chart at the mentioned areas.	

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411653	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring	
Local law issue	In accordance with The Bangladesh Labor Act, 2006, Section 63 (1- d, 3): 1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced- (iii) every dangerous part of any machinery:	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted during facility tour that 1 out of 2 compressor machines were not fenced with appropriate explosion barrier the compressor room located at shed-3.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should ensure the appropriate explosion barrier the compressor with the compressor machine.	
		 <p><u>Compressor without explosion barrier.JPG</u></p>

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Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411657	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	314 - Medical facilities do not meet legal requirements	
Subcategory	Worker Health	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	In accordance with Bangladesh Labor Rules 2015 section 77(1) and the Bangladesh Labor Rules 2022 Amendment section 30:Provided further that if the workers of an establishment work in shifts, there will be a certified medical assistant instead of the doctor registered for the night shift.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted through the worker interview & management interview that the facility did not appoint any medical assistant for the night shift workers. Note that there are 28 workers work in night shift.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility shall appoint one doctor & one medical assistant for the night shift.	



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

**4: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctor.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photocopied national identification card and other documents.
- There was no child or young employee observed in the facility
- It was evident during the documents review; the age of youngest worker is above 18 years old (DOB: 10th May 2005 & DOJ: 9th January 2024). During the facility walkthrough, there were no concerns regarding child labour observed.

**Evidence examined:**

- 1.The procedure of Recruiting regulation was available for review, the personnel files with ID or birth certificate copy were available for review, the contracts with all the employees were available for audit, and the roster had established by the factory.
2. Document review
3. Management interview
4. Worker interview
5. On-site observation during floor visit

**Any other comments:**

None

Legal age of employment:	14
Age of youngest worker found:	18
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.



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

**5: Compliance Requirements**

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Based on the Gazette Notification, the actual lowest minimum wage in the facility is BDT 12,500 per month.
- Timekeeping is CARD punched system.
- All workers are provided with written and understandable information about their employment conditions with respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Each employee was given a pay slip and signed for their wages.
- All employees were paid within 7 working days of the following month.
- Employees are aware of their minimum wage.
- Wages have been recorded according to the documents checked.
- According to the documents which were provided by the HR & Accounts Departments and during the worker's interview, it was noted that the factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Moreover, employees were allowed to take 14 days' sick leave; 10 days' casual leave according to law and 11 days' festival leave.

**Evidence examined:**

1. Document review
2. Worker interview
3. Management interview
4. Local and national laws
5. Wages and benefits policy
6. Local legal minimum wage documents
7. Payroll records from March 2023 to Audit Day.
8. Leave records such as annual leaves, sick leaves, special leaves and maternity leaves in last 3 months
9. Social group insurance and payment receipts from the local labor department
10. Labor contracts for all employees.
11. Resignation records in last 3 months
12. Pay slips of all workers interviewed
13. Overtime records

**Any other comments:**

None

**Summary Information**

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?

Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 2.0 Per Week: 32.0 Per Month: 109.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 12500	Actual Per Day: 0 Per Week: 0 Per Month: 12500	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	62 samples in 3 months of payroll records and attendance records from last 12 months as follows: 62 samples from the month of February 2024 (Recent paid month) 62 samples from the month of October 2023 (Random month) 62 samples from the month of March 2023 (Random month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Legal minimum for the Garments division: The Government has announced the pay structure, which was implemented from 20 December 2023 for the workers of the Garments Industries. There are two separate pay structures; for the garment workers (Schedule A) Grade-1: 15035 BDT/Month Grade-2: 14273 BDT/Month Grade-3: 13550 BDT/Month Grade-4: 12500 BDT/Month Trainee / Apprentice: 9875 BDT/Month For the garment workers (Schedule B) Grade-1: 18800 BDT/Month Grade-2: 15950 BDT/Month Grade-3: 15200 BDT/Month Grade-4: 12800 BDT/Month Trainee / Apprentice: 9950 BDT/Month		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	The actual lowest minimum wage in the facility was BDT. 12500 per month. This is government declaring legal minimum wage.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 9.0% of workforce earning minimum wage 91.0% of workforce earning above minimum wage		

Bonus Scheme found: Please specify details:	Bonus Scheme found: Facility provides two festival bonuses during Eid- Ul- Fitr and Eid -Ul-Azha & Attendance bonus as per facility policy. Facility provides attendance bonus BDT 400-550 all the workers for whom are present to work without any absent. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, a factory may deduct wages for un-authorized absence, for fines, housing facilities, advance payments, loans, income tax, provident fund, etc. However, the factory is deducting for unauthorized absence deduction only.
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Only when workers became unauthorized absent, deduction has been made.
Please list all deductions that have not been made.	The factory did not deduct for group insurance.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Factory had provided accurate and complete payroll & attendance records to the auditors for review where all working hours were recorded.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Facility provides at least 5% of basic wages shall be increased yearly.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Based on employees' interview, copy of appointment letter issued to employees and wage records, it was noted that equal rates were paid for equal work.

How are workers paid:	<input type="checkbox"/> Cash	<input type="checkbox"/> Cheque
	<input type="checkbox"/> Bank Transfer	<input checked="" type="checkbox"/> Other
If other, please explain:	Mobile Banking (Bkash)	

Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600411656	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility provides attendance bonus BDT: 400 to 550 to all workers as per company policy.	
Evidence	Payroll records, workers & managements interview	

Good Example		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Good Example</b>		
Status	OPEN	
Reference	ZAF600411661	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Facility provides extra 04 days earned leave encashment instead 16 days to the eligible workers each years.	
Evidence	Documents review, workers and management interview.	

Good Example		Evidence																		
<p><a href="#">[Back to findings summary]</a></p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600411662</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits &amp; Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Facility provides extra 4 festival holidays instead 11 days to all workers. Moreover, facility owner provides special 2 days leave during Eid festivals.</td> </tr> <tr> <td>Evidence</td> <td>Documents review, workers and management interview.</td> </tr> </tbody> </table>		Good Example		Status	OPEN	Reference	ZAF600411662	Clause	5 - Living Wages are Paid	Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	Subcategory	Benefits & Insurance	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Facility provides extra 4 festival holidays instead 11 days to all workers. Moreover, facility owner provides special 2 days leave during Eid festivals.	Evidence	Documents review, workers and management interview.	
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Evidence	Documents review, workers and management interview.																			

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

**6: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- In this audit, the auditor had randomly selected production records, such as: Material in/ out records, and daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employees' interviews, no inconsistency was noted either.
- Through employees' interviews, overtime is voluntary.
- Timecards are completed by CARD punched system.
- All overtime is compensated at a premium rate for all employees.
- The time frame of the records reviewed are as follows:  
62 samples for the month of February 2024 (Current paid Month)  
62 samples for the month of October 2023 (Random Month)  
62 samples for the month of March 2023 (Random Month)

According to time records and worker interviews, basic working hours were 8 hours per day and a max of 48 hours per week. The employee works 06 days in a week. The weekend of the factory was Friday. All the production department without dyeing & dyeing finishing, work on one shift from Saturday to Thursday and Friday is day off. The general working hours for Cutting, Sewing, Finishing & Packing section in the factory is operating in one shift e.g. starts from 08:00 to 17:00 with 60 minutes lunch break from 13:00 to 14:00. The printing and embroidery section in the factory is operating in two shifts e.g Shift 1 from 08:00 to 17:00 and Shift 2 from 20:00 to 5:00 with 60 minutes break in each shifts. Security has three shifts per eight hours each with roster schedule of break & weekend.

**Evidence examined:**

1. Employee interview
2. Management interview
3. Local and national laws
4. Factory policy on working hours
5. Attendance and wages records from March 2023 to Audit Day.
6. Electronic attendance system
7. Sample pay slips with recorded hours all workers interviewed
8. Quality and production records to cross check hours
9. Workers contracts

**Any other comments:**

None

Working hours' analysis	
<b>Systems &amp; Processes</b>	
What timekeeping systems are used?	CARD punched System.
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	February 2024: 7 per day, 30 per week and 109 per month October 2023: 5 per day, 24 per week and 102 per month March 2023: 7 per day, 32 per week and 97 per month



Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on timesheets and wages record review that the facility had performed excessive overtime- In February 2024 (Recent month), 11 out of 62 sample workers had maximum work in a day was found 15 hours (regular 8 hours and overtime 3 to 7 hours), 03 out of 62 weekly 78 hours (regular 48 hours and overtime 30 hours). In October 2023 (Random month), 41 out of 62 sample workers had maximum work in a day was found 13 hours (regular 8 hours and overtime 3 to 5 hours), 19 out of 62 weekly 72 hours (regular 48 hours and overtime 24 hours). In March 2023 (Random month), 07 out of 62 sample workers had maximum work in a day was found 15 hours (regular 8 hours and overtime 3 to 7 hours), 04 out of 62 weekly 81 hours (regular 48 hours and overtime 32 hours).
Approximate percentage of total workers on highest overtime hours:	4.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: During document review, worker interview, it was noted that the overtime is voluntary.
<b>Overtime premium</b>	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: The workers who are conduct overtime in the facility then receive 200% of their hourly basic wages as per legal requirements.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The workers who are conduct overtime in the facility then receive 200% of their hourly basic wages as per legal requirements.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other
Please give details	Not applicable as the factory paid higher than 125%.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	Workers worked more than 60 total hours per week and overtime is completely voluntary.

Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600397479	
Clause	6 - Working Hours are not Excessive	
Issue Title	470 - Working hours exceed what is allowed by law or collective bargaining agreement - isolated	
Subcategory	Excessive hours	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600007116	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>Bangladesh Labour Law 2006, Section 100 : Daily working hour.No adult worker shall ordinarily work or be required to work in an establishment for more than 8 (eight) hours in a day: Provided that subject to the provisions of section 108, any such worker may work in an establishment upto 10 (ten) hours also in a day.and 102 (2): (1) No adult worker shall ordinarily work or be required to work in an establishment for more than 48 (forty-eight) hours in a week. (2) Subject to the provisions of section 108, an adult worker may work for more than 48 (forty-eight) hours also in a week: Provided that the total working hours of such worker shall not exceed 60 (sixty) hours in a week, and on the average 56 (fifty-six) hours per week in a year: Provided further that the total additional working hours of a worker employed in a road transport establishment shall not exceed 150 (one hundred and fifty) hours in a year: Provided further that the Government may, in the cases of some particular industries, under conditions imposed by order in writing, relax the provisions of this section or exempt from the provisions of this section at a time for a period of not exceeding 6 (six) months, if it is satisfied that in the public interest or in the interest of economic development such relaxation or exemption is necessary.</p>	
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	
Explanation to the non compliance	It was observed through document review and management interviews (a)In February, 2023: 6 out of 62 sample workers had worked weekly overtime	

	24 hours to 30 hours in a week (exceed 12 hours/week) and daily overtime found 5 hours to 11 hours. (b)In July, 2022: 5 out of 62 sample workers had worked weekly overtime 24 hours to 30 hours in a week (exceed 12 hours/week) and daily overtime found 5 hours to 14 hours. (c) (b)In March, 2022: 15 out of 62 sample workers had worked weekly overtime 24 hours to 35 hours in a week (exceed 12 hours/week) and daily overtime found 5 hours to 13 hours.	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory shall ensure the daily & weekly overtime hours in line with legal requirements.	

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411660	
Clause	6 - Working Hours are not Excessive	
Issue Title	470 - Working hours exceed what is allowed by law or collective bargaining agreement - isolated	
Subcategory	Excessive hours	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labour Law 2006, Section 100 : Daily working hour.No adult worker shall ordinarily work or be required to work in an establishment for more than 8 (eight) hours in a day: Provided that subject to the provisions of section 108, any such worker may work in an establishment upto 10 (ten) hours also in a day.and 102 (2): (1) No adult worker shall ordinarily work or be required to work in an establishment for more than 48 (forty-eight) hours in a week. (2) Subject to the provisions of section 108, an adult worker may work for more than 48 (forty-eight) hours also in a week: Provided that the total working hours of such worker shall not exceed 60 (sixty) hours in a week, and on the average 56 (fifty-six) hours per week in a year: Provided further that the total additional working hours of a worker employed in a road transport establishment shall not exceed 150 (one hundred and fifty) hours in a year: Provided further that the Government may, in the cases of some particular industries, under conditions imposed by order in writing, relax the provisions of this section or exempt from the provisions of this section at a time for a period of not exceeding 6 (six) months, if it is satisfied that in the public interest or in the interest of economic development such relaxation or exemption is necessary.	
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	
Explanation to the non compliance	Based on timesheets and wages record review that the facility had performed excessive overtime- In February 2024 (Recent month), 11 out of 62 sample workers had maximum work in a day was found 15	

	<p>hours (regular 8 hours and overtime 3 to 7 hours), 03 out of 62 weekly 78 hours (regular 48 hours and overtime 30 hours). In October 2023 (Random month), 41 out of 62 sample workers had maximum work in a day was found 13 hours (regular 8 hours and overtime 3 to 5 hours), 19 out of 62 weekly 72 hours (regular 48 hours and overtime 24 hours). In March 2023 (Random month), 07 out of 62 sample workers had maximum work in a day was found 15 hours (regular 8 hours and overtime 3 to 7 hours), 04 out of 62 weekly 81 hours (regular 48 hours and overtime 32 hours).</p>	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	<p>It is recommended that the factory shall ensure the daily &amp; weekly overtime hours in line with legal requirements.</p>	

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

**7: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/female employees of the same rank.
- There is no restriction for the formation of a trade union in the factory.

**Evidence examined:**

1. The hiring and termination procedure, leave application records and employee handbook.
2. Payroll records
3. Attendance records
4. Termination records
5. Training records
6. Employment contracts were provided for review and they showed that male and female employees were on the same pay grade.
7. Management interview and employee interview

**Any other comments:**

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 90.0%	Female: 10.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring  <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation  <input type="checkbox"/> Termination or retirement
		<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	As per documents review, management & workers interview, there was no evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.	
<b>Professional Development</b>		

What type of training and development are available for workers?	All workers are given H&S training, different types of machine operation and quality assurance training
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



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

**8: Compliance Requirements**

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

**Additional Elements: Responsible Recruitment**

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- All employees were recruited by the factory directly.
- No labor agency was used to hire workers. No temporary worker, apprenticeship schemes, or home worker was identified by the auditors.
- There is one sub-contractor used in the factory.
- All workers get a signed labor contract and ID card during their recruitment.
- Factory maintains service books for all workers.
- Factory has a policy to provide all kinds of compensation and benefits to the employees.
- If any employee wants to leave the job, he or she may leave giving 60 days' notice prior to leave as per law.

**Evidence examined:**

1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc.
2. Management interview and employee interview
3. The hiring and termination records.
4. Worker interview.

**Any other comments:**

None

**Responsible Recruitment**

**All Workers**

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions    |   |

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

Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as there was no contractual workers in the facility.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as there was no contractual workers in the facility.

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411654	
Clause	8 - Regular Employment Is Provided	
Issue Title	523 - Isolated instances of no contracts / letters of appointment in place	
Subcategory	Terms of Employment/Engagement	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring	
Local law issue	In accordance with and The Bangladesh Labour Act, 2006, Chapter-2, Section 5: No employer shall employ any worker without giving such worker an appointment letter and every such employed worker shall be provided with an identity card with his photograph.	
ETI code	8.1 - To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.	
Explanation to the non compliance	During plant tour, it was noted that 20% of workers had no Identity Card in the sewing section on the ground floor & 1st floor at building- 02.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility shall provide identity card to all of their workers .	

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

**8A: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- As per factory tour, documents review and management & workers interview, there was one subcontractor used by facility currently.
- Therefore, no apparent concern was detected regarding this section.

**Evidence examined:**

- Management interview & workers interviews
- . Documents review
- Production capacity plan
- Material in/out registers
- Production process of the factory
- Policies and procedures

**Any other comments:**

None

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

Is there any sub-contracting at this site?  Yes  No

**Process subcontracted**

Process Subcontracted	Wash
Name of factory	Newage Textile Ltd.
Address	Gorai, Monninagar, Tangail.

Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: As per the capacity and style running in the factory observed by the auditors during the factory tour, interview with the management and through documents, it was assessed by the auditors that factory has all the required machines and manpower to deliver the capacity. And no undeclared sub-contracting was observed.
--	---

If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No It was noted during interview with the management that they are transparent with every client and disclose each and every process that is carried out with sub-contractors.
--	--

Number of sub-contractors/agents used:	1
--	---

Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Factory has brief profile of all sub-contractors mentioning the details of each sub-contractor. Further factory has a policy of selection criteria of sub-contractor and internal reports of sub-contractor in terms of Social Audit aspects.
What checks are in place to ensure no child labour is being used and work is safe?	Currently, the sub-contractor was monitored by the site. They had established a periodic checking system that no children were observed working at the sub-contracting site & the working environment was safe. Customers were also aware of the sub-contracting processes and they also monitored as per their social compliance auditing aspects. All monitoring reports were provided for review during audit.
<b>Summary of homeworking – if applicable</b>	
Is homeworking used at this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

## 9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]

### 9: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Anti-harassment issue is also covered in employee training.
- Through the factory management and employees' interview, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

#### Evidence examined:

1. The relevant policy on prevention of harassment and abuse
2. Internal grievance procedure documentation.
3. Training records
4. Management interview and employee interview

#### Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through direct supervisors, manager, suggestion box and worker committee members.
If yes, are workers aware of these channels and have access? Please give details.	Workers can share their concern with management and drop to their complaint into suggestion box.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	All workers were aware of these processes; suggestion box was known by the workers. Also, workers can share their concern with workers representatives; drop their complains into suggestion box and even go to the top management.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>



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

**10A: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Per document review, factory management representation, and workers' interview, it was observed that all workers in the factory were Bangladeshi and 100% were local workers and no permission is required for working from one district to another district.
- All workers had the proper legal rights to work in this region.
- All of them were recruited directly by the factory and no agency was involved in the factory's recruitment processes.
- No agency staff or foreign worker was used by the factory.
- There were not any deductions for items such as travel and equipment.

**Evidence examined:**

1. Hiring procedure
2. Personnel files
3. Worker's handbook
4. Worker's interview
5. Management interview

**Any other comments:**

None

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

**10B2: Compliance Requirements**

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**


- The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties and its own suppliers.
- Main production process of the factory is Cutting, Embroidery, printing, Sewing, Finishing & Packing. Facility uses chemical for their production process and provided training and Personal Protection Equipment.
- Factory management has the agreement with waste collect company for the disposal of general wastages like Chemical drum, wastage fabrics, poly, wastage cartons, papers, metal, chemical containers etc. Factory management is aware about the environmental impact of their business activities.



**Evidence examined:**

Environmental policy and procedure, Wastage Inventory, Waste contract, training record, different types of records for energy and water consumption, license, chemical inventory etc.

**Any other comments:**

None

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411648	
Clause	10B2 - Environment 2-Pillar	
Issue Title	598 - The site does not have all legally required permits for use and / or disposal of resources e.g. energy, water, air emissions, waste etc.	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Govt delay	
ETI code	10.B2.1 - Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.	
Explanation to the non compliance	It was noted through document review and management interview that Environmental Clearance Certificate (ECC) No 23-103032 was expired on 08.03.2024. Noted that the facility has already applied for the renewal but didn't get any response yet.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility shall obtain the updated Environmental Clearance Certificate (ECC) from the concerned authority.	
		 <a href="#">Expired ECC.pdf</a>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600411655	
Clause	10B2 - Environment 2-Pillar	
Issue Title	624 - Employees not trained in waste management	
Subcategory	Waste Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of monitoring	
Local law issue	The Bangladesh Labour Act, 2006, Section 54: Effective arrangements shall be taken in Every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.	
ETI code	10.B2.1 - Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.	
Explanation to the non compliance	It was noted during facility tour that there was no designated wastage area for keeping the hazardous and non-hazardous wastages.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility shall build a designated wastage area for keeping the hazardous and non-hazardous wastages.	
		 <p><u>No designated wastage store 1.JPG</u></p>  <p><u>No designated wastage store.JPG</u></p>

## Attachments

 <u><a href="#">Committee.pdf</a></u>	 <u><a href="#">Building Approval .pdf</a></u>
 <u><a href="#">CAPR-Newage.pdf</a></u>	 <u><a href="#">GSCSF75-Photoframe for Social (Newage Apparel).pdf</a></u>
 <u><a href="#">All policies.pdf</a></u>	 <u><a href="#">Factory Lisence NAL.pdf</a></u>



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

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

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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