



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000032758	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000038364	
Business name (Company name):	SAIYOG POLYPACK INDUSTRIES			
Site name:	SAIYOG POLYPACK INDUSTRIES			
Site address:	G NO 5 OPP.GOA COOP. BANK KACHIGAM DAMAN 396210 IN	Country:	IN	
Site contact and job title:	Mr Rajendra Patel / Plant Head			
Site phone:	9723811086	Site e-mail:	SAIYOGDESK@GMAIL.COM	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-06-05			

Audit Company Name:
EUROCERT INSPECTION SERVICES PVT 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:	Arun Gupta	APSCA Number:	21705563
Additional Auditors:			
Date of declaration:	2024-06-06		

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

Site Representation	
Full Name:	Mr Rajendra Patel
Title:	Plant Head
Date of declaration:	2024-06-06
<b>Comments:</b> <i>Any exceptions to this must be recorded here (e.g. different sample size):                      Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).                      The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
As the facility has got total strength of 09 Employees in the facility therefore the sample size is taken for 09 employees only instead of 10 Employees .	

## 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	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>	0.B.3		1	0	0	NC - ZAF600508942
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1	§1	7	0	0	NC - ZAF600508943 NC - ZAF600508944 NC - ZAF600508945 NC - ZAF600508946 NC - ZAF600508947 NC - ZAF600508948 NC - ZAF600508949
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
§1	In accordance with Department of Fire and Emergency Service Silvassa by Administration of Dadra and Nagar Haveli notification Number :AIGP /DFS/DD-DNH/FSRules2002/281 Dated 31-03-2005 as per Annexure 1 and Appendix VI " No objection certificate from fire service is necessary for an establishment "

## Site Details

Site Details		
Company Name	SAIYOG POLYPACK INDUSTRIES	
Site Name	SAIYOG POLYPACK INDUSTRIES	
GPS location (if available)	GPS Address:	G NO 5 OPP.GOA COOP. BANK KACHIGAM DAMAN - 396210
	Coordinates:	Latitude: 20.381730°N & Longitude: 72.888950°E
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Registration Certificate of establishment Under Goa ,Daman and Diu Shops and establishment Rule ,1975 ) , Registration Number : LE/LI/DMN/MFG/185/2019 ,Issued Date:29/01/2019 , Valid upto: 31/12/2024 •Certificate of Stability of a factory , Form No. : 1A done by Mr D.K. Khubchandani ( B.E. Civil ) ,Dated : 27-01-2020 •Consolidated Consent to Establish and Authorisation hereinafter referred to as the CCA (Consolidated Consent &amp; authorization) (Fresh) under Section-25 of the Water (Prevention &amp; Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention &amp; Control of Pollution) Act, 1981 , Authorisation issued under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 taken from Daman and Diu and Dadra Nagar Haveli Pollution Control Committee , Consent No.: : PCC/DDD/1090253 ,Dt of Issue : 07 /03/2022 , valid up to 31/03/2026 •MSME : UDYAM-GJ-25-0000752 (Udyam Registration Number ). Fire NOC from relevant authority not obtained (In accordance with Department of Fire and Emergency Service Silvassa by Administration of Dadra and Nagar Haveli notification Number :AIGP /DFS/DD-DNH/FSRules2002/281 Dated 31-03-2005 as per Annexure 1 and Appendix VI " No objection certificate from fire service is necessary for an establishment )</p>	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	<p>Scope : Manufacturing of LDPE, HMHDPE, PE Film &amp; Printing bags &amp; Process flow : Raw Material receiving : Granules /Ink , Extrusion , Printing ,Slitting ,Cutting /Sealing , Packing &amp; Dispatch</p>	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>M/s SAIYOG POLYPACK INDUSTRIES" established at current location in 2019 with manufacture Top Quality Printed as well as Plain bags and films.. The total land area occupied by the facility is 10000 Sqft and carpet area is approx. 6500 Sqft . A total of 09 employees were currently working in the facility, which includes 09 Male &amp; no Female.. The employees worked for 6 days a week in Single shift. The normal working hour was from: General Shift: 09:00 to 18:00 with Lunch Break timing Between (13:00 to 13:30 ) of 30 Minutes Lunch Break &amp; Tea Break of 15 minutes from 11:00 to 11:15 and 16:00 to 16:15 . . Employees' wages were calculated on Monthly Basis and paid on or before 07 th of each month. As per discussion with Management, there was no specific peak season There were One production building occupied by approx. 09 Employees. . Facility is operational in January 2019 with 01 concrete building as per below detail:</p>	

Structure and number of buildings	<b>Building Name:</b>		Building 01
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	Ground Floor	Quality Laboratory , Production Process : Extrusion , Slitting , Sealing and Packing , Washrooms	None
	First Floor	Stores and Administration Office	None
	Periphery	Security Room , Change Room , Ink Storage	None
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No cracks Observed		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: •Certificate of Stability of a factory , Form No. : 1A done by Mr D.K. Khubchandani ( B.E. Civil ) ,Dated : 27-01-2020		
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	Scope : Manufacturing of LDPE, HMHDPE, PE Film & Printing bags & Process flow : Raw Material receiving : Granules /Ink , Extrusion , Printing ,Slitting ,Cutting /Sealing , Packing & Dispatch • The Main equipment used by the facility are Extrusion Machine: 01 , Slitting Machine , Sealing and cutting Machine . ∴The production line is one .		
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other <input type="checkbox"/> None		
Please give details:	Worker Committee, Grievance Committee & Health & safety Committee .		
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" 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:

No accommodation provided by the facility so Not applicable.

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	09:30	In	09:05
	Out	18:00	Out	13:05
Audit type:	FULL_INITIAL			
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	Mr Rajendra Patel / Plant Head			
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>	There is no trade Union.		
<i>Reason for absence during the audit</i>	There is no trade Union.		
<i>Reason for absence at the closing meeting</i>	There is no trade Union.		

## 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	9	0	0	0	0	0	0	9
Worker numbers - female	0	0	0	0	0	0	0	0
Total	9	0	0	0	0	0	0	9
Number of Workers interviewed - male	9	0	0	0	0	0	0	9
Number of Workers interviewed - female	0	0	0	0	0	0	0	0
Total - interviewed sample size	9	0	0	0	0	0	0	9

Nationalities Structure	
Nationality of Management	Indian
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Indian      approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not have any peak production month.
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:      Not applicable.

Worker Interview Summary	
Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of group interviews:	01 Group of 04
Number of individual interviews:	Male: 5 Female: 0
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?	Employees do not have any complaints
What did the workers like the most about working at this site?	Timely salary, no health and safety issues, positive Management- easily approachable, clean working place, no abusive language, no case of any harassment
Any additional comment(s) regarding interviews:	No comments.
Attitude of workers to hours worked:	No negative comments came from the workers.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
Total of 09 employees (Male -09 and female -00) were selected for interview. All of them spoke freely of their views for the facility. All employees said that they were satisfied with their employment practices and current wages structure. They reported freedom to leave after proper notice period. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they have seen these suggestions used. They are able to complain directly to their supervisors and also felt free to give their general concerns to their grievance representative who would take it to the management.
Attitude of worker’s committee/union reps:
There was no union at site. Facility has formed workers committee and grievance committee to resolve workers grievance. During interaction with the workers representatives, it was noted that there was no restriction from the management, and they were allowed to do their works committee related task independently in required manner. There was no discrimination reported at the time of interaction with the workers representatives.
Attitude of managers:
The facility management showed a positive attitude to this audit during the whole process. All documentation requested for review were provided. Locked areas encountered during the audit were unlocked timely. At the end of the audit, all the non-compliance were accepted by the facility. No negative information reported.

**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:**

- 1) Partner is responsible for implementing standards concerning Human rights.
- 2) Facility has identified their stakeholders and salient issues.
- 3) Facility has measured direct, in-direct and potential impacts on stack holder's human rights.
- 4) Facility does have transparent system in place for confidential reporting and dealing with human rights impacts without fear of reprisal towards the reporter.
- 5) No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally.
- 6) No slavery, forced labour and human trafficking observed. All employees are of Indian nationality.
- 7) Employees are free to quit if they are not willing to work.
- 8) The facility has policy on "Human Right" which is duly endorsed by Management and management representative is responsible for implementation.

**Evidence examined:**

**Details:**

- 1) Documented policy on human rights. (Policy Number: SPI/POL/04 Dated:03.01.2024).
- 2) Supplier's social compliance monitoring records.
- 3) Interaction with Management and Interview with employees.

**Any other comments:**

None.

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Facility has a policy on Human Rights , policy number: SPI/POL/04, reviewed on 03.01.2024 .
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Policies are included in workers' manuals .

<p>Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>HR Manager responsible for implementing standards concerning Human Rights.</p>				
<p>Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has provided following grievance mechanism for confidential reporting anonymously without fear of retaliation and any breaches of policies and procedures.</p> <ol style="list-style-type: none"> <li>1.Workforce Representative</li> <li>2.Works committee.</li> <li>3.Grievance Committee</li> <li>4. Suggestion and Complaint Box.</li> </ol>				
<p>Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>				
<p>Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a confidential policy, policy number: SPI/POL/37, prepared on 13.01.2022 and reviewed on 03.01.2024 The data privacy is for the personal files, which are kept under lock and key is in HR's room, the salary of the employees, since all the salary are bank transfer, the computers are password protected. The health check-up reports are kept Confidential.</p>				
<b>Measuring Workplace Impact</b>					
<p>Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">1.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">0.5%</td> </tr> </table>	Last year	1.0%	This year	0.5%
Last year	1.0%				
This year	0.5%				
<p>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])</p>	<p style="text-align: right;">1.0%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">3.0%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">2.0%</td> </tr> </table>	Last year	3.0%	This year	2.0%
Last year	3.0%				
This year	2.0%				

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	2.0%	
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Facility had maintained Form-29, however no accidents have occurred till date.	
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	0.0%
	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 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	0.0%
	12 month	0.0%

**0B - Management Systems and code Implementation**  
[Summary of Findings]

**0B: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1) Patner is responsible to ensure compliance with these code requirements.
- 2) Based on interaction with the factory management, it was understood that factory management has developed management system for implementing & maintaining social compliance code.
- 3) Facility managers are well aware of the compliance requirements and have adequate knowledge on the legal requirements.
- 4) Facility has obtained Factory License including approved building layout plan and stability certificate.
- 5) Employees were found not aware( 04 out of 09) about the Ethical Trade Initiative (ETI) base code requirements as verified during the interaction process.
- 6) Facility has communicated ETI base code requirement to their suppliers.
- 7) Facility has conducted risk assessment and internal audit to monitor effectiveness of social management system implemented at audited site.
- 8) Facility has system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.

**Evidence examined:**

**Details:**

- 1) Facility Policy and Procedures : Policy Manual having Policy from 01 to 54 In the manual like Social policy, Prohibition of child labor Policy and more.
- 2) Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
- 3) Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- 4) Employee's training records showed the facility conducted training for employees about the social compliance when they enter the facility.
- 5) ETI training has been given to the employees on 04/04/2024 .

**Any other comments:**

None.

**Management Systems**

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

Yes  No

Please give details:

There is no prosecution .

<p>Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has established the policies and procedure with respect to social compliance. Below are details : Child labor and forced labor policy number: SPI/POL/08, Discrimination and equal opportunity policy number: SPI/POL/09, Workplace violence prevention policy number: SPI/POL/11, prepared on 01.02.2022 and reviewed on 03.01.2024.</p>
<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Facility has conducted internal audit on dated March 13 , 2024 to monitor implementation of social compliance policies and procedures to ensure effectiveness of implemented system.</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 employees have undergone an induction training where the social compliance policies and procedures were explained.</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>Based on interaction with the employees, it was noted that facility has a program to train relevant individuals regarding policy and procedure on dated 12.04.2024 ( 10:00 to15:00 ).Provided training for ETI on dated 04.04.2024 ETI Code Training was not effective.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No system certification was available.</p>
<p>Is there a Human Resources manager/department?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</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>Partner is responsible for implementing the code.</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>Facility has a confidential policy, policy number: SPI/POL/37, prepared on 01.02.2022 and reviewed on 03.01.2024</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>As per the facility procedures, the data received from the employees are kept confidential. The data will not be disclosed to others without workers' consent.</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 has system to conduct risk assessment: Social Risk Assessment ( Document Number : SPI/SA/F/17 , Rev. No.: 00 ,Dated : 09-01-2024) to evaluate the effectiveness of policy and procedures and update the same if required.</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>Corrective action is taken against identified risk. Further, implementation of corrective action against risk assessment :Social Risk Assessment : SPI/SA/F/17 , Rev. No.: 00 ,Dated : 09-01-2024) is verified during internal audit.</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 ETI code is signed off with the suppliers .Verified Code of conduct for Supplier Vivek Plastic VAPI-396195,Gujrat.</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>Facility has taken the land on rent against certificate no. IN-DN 12460741389087T verified from the Legal agreement dated 04.02.2021 &amp; Based on review of records that facility had obtained legally required Business license and approved plant layout from the concerned authority.</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>Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title . Partner is responsible for due diligence to recognize and apply 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has written policy and procedures specific to land rights. Land rights. (Policy Number : SPI/POL/05 ,Rev No. : 00 ,Dated : 03-01- 2024)</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has compensated the owner for the land prior to the facility being built. Facility has paid the stamp duty of INR 100 / of IN-DN 12460741389087T on the said property On Dated 04.02. 2021.</p>

<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land.</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>No evidence of illegal appropriation of land for facility building or expansion of footprint.</p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508942	
Clause	0B - Management Systems and code Implementation	
Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees	
Subcategory	Site's Awareness of Code/Legal Requirements	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	0.B.3 - Suppliers are expected to communicate this Code to all employees.	
Explanation to the non compliance	"Based on the audit process during worker Interaction & document review it was noted that the training on the " ETI Code of Conduct " Provided on April 04 ,2024 is not effective as 04 out of the 09 employees could not explain the "ETI Code of conduct " during the interaction process .	
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 to facility to Re- train all the workers working in the facility on the ETI Code of conduct .	

**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:**

- 1) Partner is responsible to oversee that no forced, bonded, involuntary or prison labor is employed.
- 2) There was no presence of forced / bonded or prison labour at the workplace.
- 3) Employees are not required to lodge any deposits, identity papers with the facility before or after joining the services.
- 4) All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period of 01 month.
- 5) Employees are free to leave at the end of their shift and there is no compulsion to work overtime.

**Evidence examined:**

**Details:**

- 1) Facility Policy and Procedures: Recruitment policy (Document Number: SPI/POL/15 , Rev. No.: 00 ,Dated :03.01.2024)
- 2) Personal files with application form and bio data including employment contract.
- 3) Interaction with Management and Interview with employees.

**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: Workers may resign and leave after serving a month notice period as agreed under terms of employment.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: Not applicable

<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>Workers may leave after completion of standard working hours or early if required in case of an urgency.</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>Facility understands the risks of forced / trafficked / bonded labour in its supply chain. Social Risk Assessment ( Document Number : SPI/RA/01/1 , Rev. No.: 00 ,Dated : 02-01-2024) child labour and forced labour policy (Policy Number SPI/POL/09 , Rev. No.: 00 ,Dated : 03-01-2024). The site understand the risks of forced / trafficked / bonded labour in its supply chain by doing the suppliers audits based on the ETI Code of Conduct. Verified the External Audit conducted on March 22 ,2024 of Supplier "M/s Saiyog Polypack Industries , Daman-396210</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>Facility has drafted policy and procedure to reduce the risk of forced / trafficked labour &amp; does the background verification of employees &amp; for monitoring the supply chain by conducting</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:**

- 1) Partner is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management.
- 2) Factory recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3) Facility encourages and respects all employees' rights to join union freely.
- 4) At present, there was no union / trade union in the facility.
- 5) Facility has formed works committee to resolve workers grievances.
- 6) Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.
- 7) There was no evidence of suppression of employees' rights.

**Evidence examined:**

**Details:**

- 1) Facility Policy and Procedures: Freedom of association and collective bargaining (Document Number: SPI/POL/03 , Rev. No.: 00 ,Dated : 03.01.2024)
- 2) Interaction with Management and Interview with employees.( 09 Sampled workers interviewed).
- 3) Last works committee meeting conducted on May 10,2024 & February 06, 2024 and Having 4 Members. 2 are among workers and 2 among Management .

**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 checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Grievance committee & Health & safety Committee .	
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 type="checkbox"/> Yes <input checked="" 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: Facility has formed grievance committee to resolve workers issues and grievances. Further, suggestion box is provided for confidential reporting of grievances.
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: Based on the conducted audit process and interaction with management, it was noted that adequate facility is provided to the committee members to perform their duties without any restriction. Facility has a policy regarding Freedom of Association (Policy Number : SPI/POL/03 ,Rev No. : 00 ,Dated : 03-01-2024)and facility respect the activities of Committee representatives .
Name of union and union representative, if applicable:	No union at site.
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 committees formed.
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: Based on workers interview it was noted that all workers are aware about the workers representative.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2024-02-03
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.	Based on the audit process and review of records, it was noted that workers committee Held on May 10, 2024 was effective. The Minutes covered the workers have any suggestions; Wages Issue & Minutes were communicated by displaying on notice board. As per employee's interview and interaction with workers.
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:**

**General Health & Safety –**

- 1) Partner is responsible to ensure a healthy and safe work environment in the facility.
- 2) The facility has established general health and safety policy & procedures. Verified Document no. SPI/POL/29 , dated – 01/01/2022 Reviewed on 03/01/2024.
- 3) Emergency Preparedness procedure document. -Doc Name – Emergency Evacuation Procedure. -Dated – 04/01/2022 Reviewed on 03/01/2024.
- 4) Health and safety Committee: Last committee meeting conduct on May 14,2024 and February 13,2024 having 4 Members.
- 5) General Health & Safety training has been given on dated April 15,2024 .
- 6) Verified Hazard Identification and risk assessment of processes and Job roles. Document name – Hazard Identification and Risk Assessment. Document No- SPI/SA/F-21 Dated 01-09/01/2024.

**Fire Safety and evacuation management –**

- 1) Facility has provided 08 functional fire extinguishers, 05 emergency light, 02 emergency exit
- 2) Further based on the review of fire extinguisher service records. Facility conducts inspection for the fire extinguisher externally once in a year. Last inspection conducted on 11/03/2024 externally by “All out fire services ” Last internal inspection was carried out on 10/04/2024.
- 3) It is evident through document review facility has arranged Internal mock drill training. Dated – May 11,2024 , Time 11:00 Hrs, Evacuation Time: 01.15 minutes, Head Count: 09.
- 4) It is evident through document review facility has arranged fire fighting training. It was conducted on 08/04/2024 conducted by Regal fire Services,Vapi-396185. Training has been given to 06 workers.
- 5) Based on facility tour, it was noted that aisles route was not marked in Storage area located on First floor .
- 6) Based on the facility tour on the day of Audit it was noted that the facility has not posted emergency evacuation plan in the facility.
- 7) Based on the facility tour on the day of Audit it was noted that the facility has not installed fire alarm in the facility.
- 8) Based on the audit process during document review & management interaction it was noted facility has not obtained Fire NOC from relevant authority.

**Personal Safety and hygiene-**

- 1) Training on PPEs handling, and awareness has been conducted on Dated 15/03/2024.
- 2) Facility has provided 04 toilets (02 Male, 01 Female) 01 Urinals, 1 Hand wash facility provided in all washrooms for workers.
- 4) Facility has provided 03 well equipped first aid kits. The facility has a System to replenish first aid kit at a regular interval.
- 5) Facility has provided clean Potable drinking water (02 drinking water point) to all their Employees. Verified Drinking water test report no. No- FL/FA/234212024-09 ; Dated – 13/01/2024.
- 6) The facility-maintained accident register. Verified accident register form No-29.
- 7) Medical fitness certificate verified done for Audiometric , general Health check up on dated 06-02-2024.

**Machine Safety & Electrical Safety**

- 1)All machines and electrical equipment's were found maintained in good condition.
  - 2)Safety sign was posted near machines/equipment's for employee's reference.
  - 3)External Lab Testing certificate , Pressure Vessel : Compressor ,I.D.No.071239 done by Nitish Nayak (Competent Person) Certificate No : 6(35) /CIF&B / DMN / COM /2022 /126 Done 10/10/2022 on Dated : 25-04-2024 & Due Date : 24/10/2024.
  - 4)Based on the facility tour on the day of Audit it was noted that the facility has not provided insulation mat in : Two(02) out of Four(04) Electrical control Panel installed in the facility.
- 1.Chemical safety
- Facility does use chemicals : ink in the production process which were found stored with proper labelling .
  - Chemical containers were having hazard and identification labels.
  - Material Safety Data Sheet (MSDS) was found posted nearby chemical storage area : Ink for employee's reference. Occupational health check-up was conducted for employees handling chemicals :Ink .
  - Based on facility tour on the day of audit it was noted that no secondary containment provided to ink stored in Storage Rack and ink used in processing section in the facility.

**General Safety :**

- Facility had trained 02 employees from Dr . Ganesh Patil for first aid Having Registration No. :44058 of DHANVANTARI CLINIC on dated 09-01-2024 valid for 1 years & Number of first aid box is 02 .

- Drinking water was freely available in the facility and test certificates were up to date. Drinking water points were maintained in hygienic condition.
- Ventilation, temperature and lighting were adequate in all section of the facility. - Housekeeping was found in good condition throughout the facility.
- Work zone noise monitoring done by M/s Fare Lab ,Gurugram -122002 , Dated : 19/01/2024 As per C.P.C.B. Guidelines
- Work zone monitoring done by M/s M/s Fare Lab ,Gurugram -122002 , Dated : 19/01/2024 As per Factory Act 1948 .
- Drinking Water testing done from M/s Fare Lab ,Gurugram -122002 as per IS10500 for essential Parameters on Dated 19/01/2024.
- Based on facility tour on the day of audit it was noted that personal protective equipment (PPE's) like ear plug was not used by employees working in the extrusion & Slitting section working in high noise area .

**Building Safety:**

- Construction of the building was found safe.

**Evidence examined:**

**Details:**

- 1) Health and Safety Policy.
- 2) Industrial accident records – Updated and no accident occurred since July 2023 to till date.
- 3) Firefighting equipment inspection conducted on monthly basis.
- 4) Interaction with Management and Interview with employees.

**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>Facility has established general Health &amp; Safety, occupational Health &amp; Safety policies (Policy Number :SPI/ POL / 29 ,Rev No. :00),Dated : 03-01-2024)and procedures that are fit for purpose and these are communicated to workers through training and notice board.</p> <ul style="list-style-type: none"> <li>• H&amp;S training conducted on April 15,2024.</li> </ul>
<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>Facility has included the social compliance policies in worker's manual.</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 are no additions to the building. Facility has obtained stability certificate from structural engineer for the facility building as required by law from Mr D.K. Khubchandani ( B.E. Civil ) ,Dated : 27-02-2023</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>Facility has mentioned guideline on their visitor's Policy for all visitors that is displayed on Gate Entrance .</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: 02 First Aid boxes are provided by the facility as requirement by local law requirement.</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: Facility had trained 02 employees from Dr . Ganesh Patil for first aid Having Registration No. :44058 of DHANVANTARI CLINIC on dated 09-01-2024 valid for 1 years.</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: Not applicable as transport facility is not provided by the facility.</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: Facility has not provided any dormitory to workers so not applicable .</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: Risk Assessment ( HIRA) Health and safety risk assessment reviewed on Document No. : SPI/SA/F21 .Dated : 09/01/2024 ,Rev .No. :00 .</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: Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal for natural resources .</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: Facility does not use any banned chemicals. Facility meets all the environmental standards based on customer requirement.</p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508943	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	214 - No evacuation plan or designated emergency exit route	
Subcategory	Fire Safety - Fire alarms & Evacuation	
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 type="checkbox"/> Other	
Root cause - Other		
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	Based on facility tour, it was noted that aisles route was not marked in Storage area located on First floor . Due to above situation employees may find difficulty in finding direction of closest exit/emergency exit in case of emergency situation.	
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 facility shall ensure that aisles routes are marked in all section of the facility .	
		 <p><u>NC PIC # Aisles Marking not done on first floor</u> ..JPG</p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508944	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels	
Subcategory	Electrical risk	
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 type="checkbox"/> Other	
Root cause - Other		
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	Based on the facility tour on the day of Audit it was noted that the facility has not provided insulation mat in : Two(02) out of Four(04) Electrical control Panel installed in the facility.	
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 to the Facility to provide insulation mat under all electrical panel in the facility .	
		 <p><u>NC PIC # Insulation not provided.JPG</u></p>  <p><u>NC PIC # Insulation not provided under electrical panel .JPG</u></p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508945	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	276 - Workers are not issued with appropriate Personal Protective Equipment (PPE)	
Subcategory	Personal Protective Equipment/Clothing	
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 type="checkbox"/> Other	
Root cause - Other		
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	Based on facility tour on the day of audit it was noted that personal protective equipment (PPE's) like ear plug was not used by employees working in the extrusion & Slitting section working in high noise area .	
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 facility to provide all required protective equipment (PPE's) to employees working in the extrusion & Slitting section.	
		 <p><u>NC PIC # Ear plug not provided.JPG</u></p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508946	
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 type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
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	Based on facility tour on the day of audit it was noted that no secondary containment provided to ink stored in Storage Rack and ink used in procession section in the facility.	 <p><u>NC PIC # No secondary containment provided for ink used in processing Area.JPG</u></p>
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 facility to provide secondary containment to ink stored in Storage Rack and ink used in procession section in the facility.	 <p><u>NC PIC # No secondary containment provided for ink stored in storage area.JPG</u></p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508947	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	214 - No evacuation plan or designated emergency exit route	
Subcategory	Fire Safety - Fire alarms & Evacuation	
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 type="checkbox"/> Other	
Root cause - Other		
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	Based on the facility tour on the day of Audit it was noted that the facility has not posted emergency evacuation plan in the facility.	
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 to the facility to post the evacuation plan at prominent locations in the facility.	

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508948	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	192 - Absence of functional fire alarms / smoke detectors	
Subcategory	Fire Safety - Fire alarms & Evacuation	
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 type="checkbox"/> Other	
Root cause - Other		
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	Based on the facility tour on the day of Audit it was noted that the facility has not installed fire alarm in the facility.	
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 to the facility to installed fire alarm at prominent locations in the facility.	

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600508949	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	172 - Fire licence, inspection, or certificates not in place as required by law	
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 checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Department of Fire and Emergency Service Silvassa by Administration of Dadra and Nagar Haveli notification Number :AIGP /DFS/DD-DNH/FSRules2002/281 Dated 31-03-2005 as per Annexure 1 and Appendix VI " No objection certificate from fire service is necessary for an establishment "	
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	Based on the audit process during document review & management interaction it was noted facility has not obtained Fire NOC from relevant authority.	
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 must obtained Fire NOC from relevant authority	



**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:**

- 1) Partner is responsible to oversee that no child is employed at site.
- 2) There was no evidence of child labour or young labour throughout the facility.
- 3) No juvenile workers (under the age of 18) are employed at the facility.
- 4) Age proof records were maintained in the form of Aadhar card and Pancard. Age proof was maintained for 09 of 09 sampled employees.
- 5) As per available records, age of youngest worker was 22 years completed.
- 6) Based on the employee interviews, review of facility's Anti Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labour.

**Evidence examined:**

**Details:**

- 1) Child Labour and Child Labour Remediation Policy.( Policy Number : SPI/POL/08 Dated : 03.01.2024 ) and Child Labour Remediation Policy ( Policy Number : Policy Number : SPI/POL/07 Dated : 03.01.2024)
- 2) Age Proof records of 09 of 09 selected samples.
- 3) Interaction with Management and Interview with employees.

**Any other comments:**

None.

Legal age of employment:	15
Age of youngest worker found:	28
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:**

- 1) Partner is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law.
- 2) Based on employee's interview, wages are fixed on monthly wage and paid once in a month.
- 3) All employees are paid on monthly basis through bank transfer by 7th of every month regularly in past 12 months.
- 4) Based on employee's interview, it was noted that pay slip is provided to all employees regularly as per law.
- 5) Facility has extended Leave with Wage benefits to the employees. Leave with wage were found calculated accurately during full and final payment of left employees.
- 6) Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.

**Evidence examined:**

**Details:**

- 1) Facility Policy : Wage & benefit : ( Policy Number : SPI/POL/14 Dated : 03.01.2024 ) 2)Wage record, Pay slip and Time records for 09 selected samples for 03 months i.e.,  
April 2024 – Most Recent paid month,  
January 2024 – Random month  
July 2023 – Random month.
- 2) Leave with wage records (Form No: 15).
- 3) Full and final Settlement paid records.
- 4) List of National and Festival Holidays (Form 1A).
- 5) Interaction with management and Employees.

**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: 2.0 Per Week: 48.0 Per Month: null	Actual Per Day: 2.0 Per Week: 48.0 Per Month: 0.0	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: 0.0 Per Week: 0.0 Per Month: 0.0	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: 462 Per Week: null Per Month: 12012	Actual Per Day: 480.76 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)	09 attendance records and payroll records for April 2024(Current month), 09 attendance records and payroll records for January 2024(Random Month) 09 attendance records and payroll records for July 2023 (Random Month) were reviewed in this audit.		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The minimum wages of Gujarat State applicable for industry to this facility w.e.f. from 01-10-2023 to 31-03-2024 is : Unskilled INR 12012/- per month; Semi-Skilled 12298/-INR per month; Skilled INR 12558/- per month & The minimum wages of Gujarat State applicable for industry to this facility w.e.f. from 01-04-2024 to 30-09-2024 is : Unskilled INR 12376/- per month; Semi-S		
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 type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Minimum wages paid by the facility: INR 12500/ - per month.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Bonus Scheme found : Facility pay bonus at the rate of 8.33 % of their total salary as per policy. The Bonus for the period of (2022 -2023) Given on November 08 ,2023 . 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:	No deduction ( Social Security ) as facility employees strength is below 10 .		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	Facility is deducting as per law requirement only .		

Please list all deductions that have not been made.	Not Applicable.
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: Based on audit process, it was noted that all required meeting/training are conducted during working hours for which employees are paid.
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: The State government revises the minimum wage once in every six months which the facilities have to comply.
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: From the review of available records it was noted that equal pay is given for same nature of work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

**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:**

- 1) Facility has restricted normal working hours to 8 hours per day and 48 hours per week. The facility operates in one shift (09:00 hours to 18:00 hours ), with Lunch breaks- 30 minutes.(13:00 hours to 13:30 hours. Tea time 11:00 hours to 11:15 hours for 15 minutes each) .
- 2) Based from tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
- 3) The facility has implemented Biometric time recording system which is acknowledged by each employee on daily basis.
- 4) Overtime is voluntary.  
Regular working hours analysis –  
Based on review of time records, the working hours could be summarized as follows:
  - For April 2024 (Current month), the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).
  - For January 2024 (Random month) the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).
  - For July 2023 (Random month) the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).

**Evidence examined:**

**Details:**

- 1) Facility Policy: Working hour Policy (Policy Number: SPI/POL/14 Reviewed in January 03,2024).
- 2) In/Out time records and Salary register for 09 selected samples for 03 Random months.
- 3) Interaction with management and Employees.
- 4) Sample pay slips with recorded hours all employees interviewed.
- 5) Employees contracts  
 Regular working hours analysis-  
 -April 2024 (Current month) – 8 hours per day and 48 hours per week (As per Workers interview & Document Review)  
 -January 2024 (Random month) – 8 hours per day and 48 hours per week (As per Workers interview & Document Review)  
 -July 2023 (Random month) – 8 hours per day and 48 hours per week (As per Workers interview & Document Review)  
 Overtime hours analysis-  
 -April 2024: No Overtime in the Month.  
 -January 2024: No Overtime in the Month.  
 -July 2023: No Overtime in the Month.

**Any other comments:**

None.

**Working hours' analysis**

**Systems & Processes**

What timekeeping systems are used?	Electronic system (Biometric time recording 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
<b>Overtime Hours worked</b>	
Actual overtime hours worked in sample (State per day/week/month)	00 hours per day/00 hours per week/00 Hours per month.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: 48 hours per week (48 standard + 00 overtime).
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: As per policy, overtime will be performed voluntarily. No overtime recorded for selected sample months.
<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: As per policy overtime will be paid at the rate of 200% of regular wage rate. No overtime recorded for selected sample months.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No As per policy overtime will be paid at the rate of 200% of regular wage rate. No overtime recorded for selected sample months.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	As per policy overtime will be paid at the rate of 200% of regular wage rate.
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 type="checkbox"/> Other reasons (please specify)

Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable.
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

**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:**

- 1) Facility does not discriminate its employees in terms of hiring, compensation, access to training, promotion, termination, or retirement based on caste, national origin, religion, age, disability, gender, marital status, Sexual orientation, union membership or political affiliation or any others thereof which could lead to discrimination.
- 2) Based on wage records review, the facility provides the same pay for all employees for same work of similar nature.
- 3) No employee was required to conduct examination of hepatitis B virus and HIV.
- 4) There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- 5) There was no evidence of sexual harassment.

**Evidence examined:**

**Details:**

- 1) Facility Policy : Discrimination Policy : ( Policy Number : SPI/POL/09 Dated: 03.01.2024 )
- 2) Appointment letter with terms and conditions of employment for 09 of 09 selected sampled employees.
- 3) Salary and other benefit records.
- 4) Interaction with management and employees.

**Any other comments:**

None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 100.0%	Female: 0.0%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	None		
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	No discrimination was observed.		
<b>Professional Development</b>			
What type of training and development are available for workers?	Facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.		

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

**8: Compliance Requirements**

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1) Partner is responsible to ensure compliance with these code requirements.
- 2) Employment contracts (appointment letters) were available and maintained for 09 of 09 selected employees. Terms and conditions of employment were clearly defined in appointment letter issued to the employees.
- 3) Facility understands recruitment process. Facility has not engaged any agency or Contractor.
- 4) Facility does not employ any migrant workers.
- 5) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment.
- 6) Photo identification card is issued to all the employees.

**Evidence examined:**

**Details:**

- 1) Facility Policy : Employment & Hiring Policy (Policy No. : SPI/POL/15 , Dated : 03.01.2024)
- 2) Appointment letter with terms and conditions for 09 of 09 selected samples.
- 3) Salary and other benefit records.
- 4) Interaction with management and Employees.

**Any other comments:**

None.

**Responsible Recruitment**

**All Workers**

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

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers presented |
| <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:	Facility does not employ any migrant workers.
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: Facility does not employ any migrant workers.
Is there any observation on this finding?	Facility does not employ any migrant workers.
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	Facility does not employ any Agency workers
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: Facility does not employ any agency workers.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility does not employ any agency workers.
<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: Facility does not employ any contractor workers.

Do all contractor workers understand their terms of employment?

Yes  No

Please give details:

Facility does not employ any contractor 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:**

- 1) At present, Facility is not using Subcontractors as confirmed during interaction with the management.
- 2) The facility does not use home workers.

**Evidence examined:**

**Details:**

- 1) Facility Policy.
- 2) Inward and outward material registers.
- 3) Production records.
- 4) Interaction with management.

**Any other comments:**

None.

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

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

**Summary of homeworking – if applicable**

Is homeworking used at this site?     Yes     No



<p>Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<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:**

- 1) Partner is responsible to ensure compliance with this code.
- 2) Facility has not employed any foreign employees.
- 3) Facility has not employed any agency worker.
- 4) Facility has maintained personnel files for all sampled 09 employees with photocopies of documentation showing that they have local citizenship and do not need any special permission to work in India.

**Evidence examined:**

**Details:**

- 1) Recruitment policies.
- 2) Interaction with management and employees.
- 3) Personal data files (09 personnel files were checked for proof of identity documentation).

**Any other comments:**

None.

**10B4 - Environment 4–Pillar**  
**[Summary of Findings]**

**10B4: Compliance Requirements**

- 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
- 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
- 10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements
- 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
- 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).
- 10.B4.7 Businesses shall make continuous improvements in their environmental performance.
- 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
- 10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site’s efforts to improve environmental performance.
- 10B4: Guidance for Observations
- 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
- 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

**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) Partner is responsible for all environmental issues.
- 2) Facility has drafted an environmental policy.
- 3) Environment policy and procedure available with factory are concerning environmental issues & Environment impact assessment done Document Number : SPI/AIA/01 Considering the life cycle of product.
- 4) Facility has a system to provide environmental awareness through notice board post to relevant employees. The awareness on environment with respect to " How to save electricity " imparted on January 11 ,2024 & " Reduction of waste " training done on January 05,2024 to facility employees.
- 5) No official complaints or legal recommendations found for the past months.
- 6) The facility carried out ambient & Indoor air quality test covering Parameters as prescribed in CPCB on January13,2024 from External Laboratory and the result was compliant.
- 7) The facility-maintained records of natural resource consumption.
- 8) Facility has taken Consolidated Consent to Establish and Authorization hereinafter referred to as the CCA (Consolidated Consent & authorization) (Fresh) under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981 , Authorization issued under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 taken from Daman and Diu and Dadra Nagar Havelli Pollution Control Committee , Consent No.: PCC/DDD/1090253 ,Dt of Issue : 07 /03/2022 , valid up to 31/03/2026

**Evidence examined:**

<p>Details: 1) Facility Policy: Environment policy : ( Policy Number : SPI/POL/17 Dated : 03.01.2024 ) &amp; Waste Disposal Policy :( Policy Number : SPI/POL/44 Dated : 03.01.2024 ) 2) Interaction with management and Employees. 3) Noise assessment test.</p>
<p><b>Any other comments:</b></p>
<p>None.</p>

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Plant Head : Mr Rajendra Patel responsible for environmental issues .
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has conducted risk assessment on covering environmental impact of the site. Risk assessment done on 03/01/2024 . Verified for the document Dated : 03.01.2024 document no. : SPI/AIA/01-00 .
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No system certification .
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy highlights the key impacts on the environment and to comply with the legal requirements.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has taken Consolidated Consent to Establish and Authorization hereinafter referred to as the CCA (Consolidated Consent & authorization) (Fresh) under Section-25 of the Water (Prevention & Control of Pollution) Act, 1974 and under Section-21 of the Air (Prevention & Control of Pollution) Act, 1981 , Authorization issued under the provisions of Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 taken from Daman and Diu and Dadra Nagar Haveli Pollution Control Committee , Consent No.: PCC/DDD/1090253 ,Dt of Issue : 07 /03/2022 , valid up to 31/03/2026

Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: List of chemicals maintained by the facility.	
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No client standard was applied, and destination country's local law was not applicable in India.	
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had conducted environmental impact assessment; Reduction target is 5%.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No Evidence shown .	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have a system in place for measuring and monitoring consumption of Electricity .	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable.	
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	366684	210788
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Borewell	Borewell
Water Volume Used	19	7
Water Discharged	Government Sewer	Government Sewer
Water Volume Discharged	13	4
Water Volume Recycled	0	0

Total waste produced	Corrugate Waste : 260 kg Polyethene waste : 130 kg Oil : 06 Litre	Corrugate Waste : 54 kg Polyethene waste : 33 KG Oil : 01 Litre
Total hazardous waste produced	0	0
Waste to recycling	Corrugate Waste : 260 kg Polyethene waste : 130 kg Oil : 06 Litre	Corrugate Waste : 54 kg Polyethene waste : 33 KG Oil : 01 Litre
Waste to landfill	25	05
Waste to other	18	02
Total Product Produced	1130 Tons	54 Tons

**10C - Business Ethics – 4-Pillar Audit**  
**[Summary of Findings]**

**10C: Compliance Requirements**

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

**10C: Guidance for Observations**

- 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

**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) Partner is responsible to ensure compliance and for implementing standards concerning Business Ethics.
- 2) Factory has established a written policy and procedures based on Business Ethics which concerned bribery, corruption, or unethical Business Practice.
- 3) Every department is responsible to conduct their business ethically without bribery, corruption, or any type of fraudulent business practice as stipulated in Business ethic policy.
- 4) Facility has provided the training on Business Ethics policy & procedure .

**Evidence examined:**

**Details:**

- 1) Facility has developed policies on business ethics covering anti-corruption and anti-bribery including gift and gratuity and same is displayed in local language. Facility has transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 2) Interaction with management and Employees.

**Any other comments:**

None.

<p>Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: Facility has developed their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers .</p>
<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Facility has provided the training on Business Ethics policy &amp; procedure on March25,2024 .</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: As per management, facility regularly updates the policy as required. Last review done on 03/01 /2024</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility requires third parties including suppliers completes their own business ethics training and same is verified on the day of audit.</p>

## Attachments

 <p>05/06/2024 10:06</p>	 <p>05/06/2024 10:06</p>
 <p>05/06/2024 10:04</p>	 <p>05/06/2024 10:06</p>
 <p>05/06/2024 10:04</p>	 <p>05/06/2024 10:12</p>



Assembly Area.JPG



MSDS Displayed.JPG



Lunch Section.JPG



Main Entrance.JPG



Hand Wash Station.JPG



Laboratory.JPG



Exit Direction Marked.JPG



Drinking Water.JPG



Security Guard cabin.JPG



First Aid.JPG



Emergency Light.JPG



Electrical Panel With Insulation Mat.JPG



First Aid Instructions.JPG



Emergency Contact Numbers.JPG



Fire Extinguishers.JPG



Environment Information Board.JPG



Environment Policy.JPG



Urinal.JPG



Toilets.JPG



Worker Lockers.JPG



Suggestion Box.JPG



Toilet.JPG



Working Rules for Safety.JPG



NC PIC # Aisles Marking not done on first floor ..JPG



NC PIC # Insulation not provided under electrical panel .JPG



NC PIC # Insulation not provided.JPG



NC PIC # Ear plug not provided.JPG



NC PIC # No secondary containment provided for ink stored in storage area.JPG



NC PIC # No secondary containment provided for ink used in processing Area.JPG



Signed CAPR.pdf



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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.

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