



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000006569	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000006777	
Business name (Company name):	GREENWAY TEX			
Site name:	GREENWAY TEX			
Site address:	DOOR NO : 101 / 1B3, KAIRALI SCHOOL ROAD, VANJIPALAYAM ROAD, VEERAPANDI, IDUVAMPALAYAM, TIRUPUR 641687 IN	Country:	IN	
Site contact and job title:	Mr. G.B Ramkumar / Managing Partner			
Site phone:	7373732549	Site e-mail:	greenwaytex2022@gmail.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2023-09-14			

Audit Company Name:
Intertek India

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:	Suresh Praj	APSCA Number:	21700914
Additional Auditors:			
Date of declaration:	2023-09-14		

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. G.B Ramkumar
Title:	Managing Partner
Date of declaration:	2023-09-14
Comments: <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>	
It was noted that the facility has started the operation since November 2022. Audit sample period is from November 2022 to August 2023.	

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	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.3		1	0	0	NC - ZAF600180590
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.3	§1	1	0	0	NC - ZAF600180591
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Rule 40 and 45 of the Tamil Nadu Factories Rules 1950. Rule 40: Latrines to conform to public health requirements: Latrines other than those connected with an efficient water-home sewage system, shall comply with the requirements of the Public Health authorities. Rule 45: Urinals to conform to public health requirements: Urinals other than those connected with efficient water borne sewage system, and urinals in a factory wherein more than two hundred and fifty workers are ordinarily employed shall comply with the requirements of the Public Health authorities.

Site Details

Site Details		
Company Name	GREENWAY TEX	
Site Name	GREENWAY TEX	
GPS location (if available)	GPS Address:	38H3+65, Andipalayam, Tamil Nadu 641687
	Coordinates:	11°04'41.4"N 77°18'09.8"E
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	a) Factory license with reference number TPR 23017 dated 3rd July, 2023 valid up to 31st December, 2023(Maximum of 100 workers and HP 129), issued by the Joint Director of Industrial Safety and Health II, Tirupur. b)Fire license with reference number 1538/2023, K. Dis 8467/B1/2023 dated 16th June, 2023, valid for one year, issued by the District Officer, Fire and Rescue Services, Tirupur. c) Certified standing order with reference number Rc.No.B/3291/2023 dated 10th August 2023 issued by the Certifying department, Labour department, Coimbatore.	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturer and exporter of all kinds of knitted garments for gents, ladies and kids. The main production process of the facility includes fabric and accessory storage, cutting, cut panel checking, sewing, ironing, final checking packing, finished goods storage and despatching.	

<p>Site description: (Include size, location, and age of site. Also, include structure and number of buildings)</p>	<p>Site summary: •This Audited site “Greenway Tex ” is located at Door No: 101/1B3, Kairali School Road, Vanjipalayam Road, Veerapandi, Iduvampalayam, Tirupur District 641687, Tamil Nadu, India. The total land area occupied by the facility is about 58,000 Square feet and the built-up area is about 11,000 Square feet. They have started their operation at the existing location since November 2022. •This SMETA 2 pillar full initial announced audit was conducted by Intertek India Private Limited on 14th September 2023. •1 auditor in 1 day (1 Man-day) covered the assessment of the facility’s operation against the ETI Base Code and local legislations on a sample basis. •Total weekly production capacity of the facility is 7,000 pieces. •Mr. R. Balakrishnan – Managing Partner and Mr. G.B Ramkumar- Managing Partner, Akalya-HR Executive were present throughout the audit process including opening and closing meeting and assured full co-operation to this audit. •Overall responsibility for meeting the standards is taken by Mr. G.B Ramkumar- Managing Partner, Akalya-HR Executive •Audit sample review period for this audit is from November 2022 to August 2023. Note: The facility started its operation since November 2022. •The facility is engaged in the production of all kinds knitted ready-made garments. •The facility had a total strength of 32 employees (male 20 and female 12), which included 21 production workers(male 14 and female 7), 11 non-production/ management/staff (male 6 and female 5). All employees were directly recruited by the facility. •All employees work 6 days in a week. Sunday is the weekly rest day for all employees. •The facility has engaged with one general day shift operation. Working hours of the facility is from 8:30 am to 5:30 pm, lunch break is from 12:30 pm to 1:30 pm, Morning tea break is from 10:30 am to 10:45 am and evening tea from 3:30 pm to 3:45 pm. •There is no evidence of female in management and among supervisors. •10 workers interviewed during the day of the audit. (male 7 & 3 female). 4 employees in 1 group (4x1=4) and 6 individual interviews conducted in confidential. •The age of youngest worker found on the day of audit is above 21 years above. •No union exists at this facility. The facility has made various type of committees through election process. •A total number 30 records (August 2023: 10 records, January 2023: 10 records and November 2022: 10 records) of wage and time records including other related benefits and deduction records verified on a sample basis. •Overall appearance of the facility is observed safe and secure. Workers were observed comfortable with the working conditions. The facility management was cooperative to the entire audit process. The facility has provided free and full access to all required production and non-production area, records and worker interview. An opening and closing meeting conducted with appropriate management representatives and worker committee members. The facility has not made any restriction to take digital images during verification plant tour. The facility management was cooperative and transparent to provide all required details/documents during the audit process. The facility management shown positive attitude throughout the audit process and audit result.</p>
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Structure and number of buildings	Building Name:		Building Number 1
	Floor	Description	Remark
	Ground Floor	Admin office, conference room, sewing section, checking area, Ironing, packing, finished goods storage area.	None.
	First Floor	Fabric storage, cutting section, cut panel checking.	None.
	Roof top	Solar panel board.	None.
	Building Name:		Shed Number 1(Periphery area)
	Floor	Description	Remark
	Ground Floor	Security hold area, generator, compressor, creche, male and female retiring rooms, dining hall, parking area.	None.
	Building Name:		Shed Number 2(Periphery area)
	Floor	Description	Remark
Ground Floor	Male and female toilets/wash rooms.	None.	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such issue noticed during audit process.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building stability certificate dated 23rd June, 2023 valid up to 22nd June, 2026, issued by Er. M. Senthil Marimuthu. (Competency number H1/7689/2022, valid from 18th May 2022 to 17th May 2025).		
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	Select a month to Select a month		

Process overview	The main production process of the facility includes fabric and accessory storage, cutting, cut panel checking, sewing, ironing, final checking packing, finished goods storage and despatching. The facility is equipped with production machines such as overlock machines, flat lock machines, single needle machines, cutting machine, ironing machines, stain remover, compressor, generator, portable electric boiler etc., with 4 production lines.
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:	1. Worker Committee, 2. Grievance redressal committee, 3. Internal compliant committee with external NGO participation, 4. Health and 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. No accommodation provided by the facility.

Audit Parameters		
Time in and time out	Day 1	
	In	09:30
	Out	17:30
Audit type:	FULL_INITIAL	
Was the audit announced?	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. G.B Ramkumar / Managing Partner	
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	No	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No union established in this facility. Trade union is not a mandatory requirement as per the local law.		
<i>Reason for absence during the audit</i>	Worker representatives were present during opening, closing meeting and interview session but not during whole process of audit, since they were busy with their production process. No union established in this facility. Trade union is not a mandatory requirement as per the local law.		
<i>Reason for absence at the closing meeting</i>	No union established in this facility. Trade union is not a mandatory requirement as per the local law.		

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	20	0	0	0	0	0	0	20
Worker numbers – female	12	0	0	0	0	0	0	12
Total	32	0	0	0	0	0	0	32
Number of Workers interviewed – male	7	0	0	0	0	0	0	7
Number of Workers interviewed – female	3	0	0	0	0	0	0	3
Total – interviewed sample size	10	0	0	0	0	0	0	10

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 %: 98%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. No apparent peak season observed.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of group interviews:	1 (1 group of 4 workers)
Number of individual interviews:	Male: 3 Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No negative comment heard during worker interview session.
What did the workers like the most about working at this site?	Ontime payment, safe and friendly working atmosphere.
Any additional comment(s) regarding interviews:	None.
Attitude of workers to hours worked:	Positive, Workers reported comfortable with work schedule and working atmosphere.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

All workers said that they were satisfied with their employment at the factory and current wages which in their view were in line with legal minimum wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to give complaint directly to their supervisors but also felt free to give their general concerns, such as health and safety issues to their worker representative who would take it to the worker management committee.

Attitude of worker's committee/union reps:

The committee members from worker committee participated in the opening and closing meeting, interview session. No negative comments made from the members interviewed, all were favourable and happy with the functioning of the management. Management representatives were adequately represented in all required committee meetings. No arbitrary interference reported during assessment.

Attitude of managers:

The factory management had a system in place to check their current practices against their clients' requirements/Code of conduct and all applicable local laws, and they took notice of the findings of the internal audit team. HR and Compliance has taken responsibility to implementing legal and code standards. The management team was open with the auditors and co-operative throughout the audit.

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

0A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- Factory implements and maintains systems for delivering compliance to this code.
- Mr. G.B Ramkumar- Managing Partner and Ms. Akalya-HR Executive are responsible for compliance with the code.
- The facility has maintained written policy on Universal Rights Covering UNGP and ETI base code on notice boards.
- The facility has communicated the policy to workers and business partners.
- The facility has adopted comprehensive ethics and related policies applicable to its business to be conducted with honesty and integrity and in compliance with all applicable laws and regulations. The facility has established a well settled policy on ethical standards in line with ETI Base Code and all applicable laws on business and establish accountability.
- The facility has an open-door policy and employees are free to approach management on any matter of human rights violation.
- Employees are encouraged to report any such issues directly to the Manager HR & Compliance or the head of the facility by telephone, SMS or by email.
- Telephone numbers and email ID of Factory Manager, HR & Compliance Executive etc, displayed on notice board and communicated to all employees through training session.
- The name and contact details of the Inspector of Factories have also been displayed on the notice board.
- It was noted that the facility has written policy and procedure pertaining to data privacy for worker in formation with adequate control.

Evidence examined:

- Details:
- Written policies and procedures on Universal Rights covering UNGP.
 - Management and worker interview
 - Training records
 - Worker interviews
 - Policy communication records to business partners.

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: It was noted during record review and management interview that the facility has maintained any policy and procedure on Universal Rights Covering UNGP.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted during audit process that the worker's manual and employment contract reflected the Universal Rights covering UNGP policy.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. G.B Ramkumar- Managing Partner and Ms. Akalya-HR Executive are responsible for compliance with the code.
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has an open-door policy and employees are free to approach management on any matters of human rights violation. Confidential reporting mechanism available to report any issues anonymously.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policies & Procedures pertaining to data privacy provides adequate control verified during assessment.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 0.0%
	This year 25.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	15.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0%
	This year 10.0%

Quarterly (90 days) % absenteeism($\text{Number of days lost through job absence in the period} / [(\text{Number of employees on 1st of the period} + \text{Number of employees on the last day of the period} / 2)] * \text{Number of available workdays in the month}$)	5.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted during audit process that the facility has maintained Accident register. However, there is no accident reported.
Annual Number of work related accidents and injuries per 100 workers($(\text{Number of work related accidents and injuries} * 100) / \text{Number of total workers}$)	Last year 0.0% This year 0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers($(\text{Number of work related accidents and injuries} * 100) / \text{Number of total workers}$)	0.0%
Lost day work cases per 100 workers($(\text{Number of lost days due to work accidents and work related injuries} * 100) / \text{Number of total workers}$)	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%

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

OB: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- Factory implements and maintains systems for delivering compliance to this code.
- Mr. G.B Ramkumar- Managing Partner and Ms. Akalya-HR Executive are responsible for compliance with the code.
- The facility has displayed ETI base code on notice boards.
- The facility has also monitored its management systems by conducting internal audit, at least annually to ensure compliance to the code.
- Policies and procedures pertaining to Child Labour, Forced Labour, discrimination, Harassment and abuse are available and are displayed on the notice board at multiple locations in conspicuous places.
- It was noted that the facility had provided ETI base code training to their employees on 25th July 2023. However, It was noted that the 5 out of 10 sampled workers are not aware about the ETI base code.
- The facility has a procedure for control of suppliers/sub-contractors, agency/service providers to inform their obligations under the local laws and ETI Code requirements.
- The facility has maintained relevant records such as written contract, communication records.
- The facility is in possession of all legal documents and meets all requirements relating to national laws and practices.
- It was verified during assessment that the facility has maintained all required license, certificates such as business license, fire license, building stability certificate, drinking water test report as per the local law.
 - a) Factory license with reference number TPR 23017 dated 3rd July, 2023 valid up to 31st December, 2023(Maximum of 100 workers and HP 129), issued by the Joint Director of Industrial Safety and Health II, Tirupur.
 - b)Fire license with reference number 1538/2023, K. Dis 8467/B1/2023 dated 16th June, 2023, valid for one year, issued by the District Officer, Fire and Rescue Services, Tirupur.
 - c) Certified standing order with reference number Rc.No.B/3291/2023 dated 10th August 2023 issued by the Certifying department, Labour department, Coimbatore.
- Risk Assessment record dated 1st April, 2023.
- Internal audit report dated 1st August, 2023.
- Management review meeting record dated 2nd August, 2023.

Evidence examined:

Details:

- Written policies and procedures on management system and code implementation. •Management interview.
- Verification of business license and other documents.
- Training records.
- Policy communication records of business partners.
- Worker interviews.
- Internal audit records.
- Risk assessment report.
- Management review report.

Any other comments:

None.

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such incident reported during site visit.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policies & Procedures pertaining to Child labour forced labour, discrimination and harassment & abuse are available and are displayed on the notice board at the entrance of the facility and in the production area.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	It was noted during audit process that the facility has displayed written policies and communicated it to employees through training session.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted during record review and interview session that the facility has provided training. General training, ETI Code training covered the relevant subjects such as forced labour, discrimination, harassment and abuse.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: It was noted that the facility had provided ETI base code training to their employees on 25th July 2023. However, It was noted that the 5 out of 10 sampled workers are not aware about the ETI base code.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility has not obtained any ISO certification standards.
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Ms. Akalya-HR Executive is the responsible person.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. G.B Ramkumar- Managing Partner.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Written policy and procedure verified.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Written confidentiality policy and procedure reviewed.

<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>It was noted during record review and management interview that the facility has conducted periodical health and safety risk assessment as per the industrial safety standards in line with the legal requirements.</p> <ul style="list-style-type: none"> •Risk Assessment record dated 1st April, 2023. •Internal audit report dated 1st August, 2023. •Management review meeting record dated 2nd August, 2023.
<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>It was noted during record review and management interview that the facility has conducted periodical health and safety risk assessment as per the industrial safety standards in line with the legal requirements.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has a procedure for control of suppliers of their obligations. Supplier evaluation/assessment records verified.</p>
<p>Land Rights</p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has occupied the land and buildings on a rental basis. Rental agreement, payment records, building stability and approved building plan etc., verified.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has maintained policy and procedures to conduct legal due diligence in line with the national laws.</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>Written policy on land rights verified. All legal requirements and consent pertaining to land rights are first scrutinised by the legal advisor and approval obtained before any transaction is carried out.</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>The facility has occupied the land and buildings on a rental basis. Rental agreement, payment records, building stability and approved building plan etc., verified.</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>Approved building plan, building stability record Approval, business license verified.</p>

Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?

Yes No

Please give details:

No such issue noticed during record review and management interview. No addition or expansion observed. Building layout plan is corresponds to the present production area.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600180590	
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 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	It was noted that the facility had provided ETI base code training to their employees on 25th July 2023. However, It was noted that the 5 out of 10 sampled workers were not aware about the ETI base code.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should provide effective training on ETI Base code to their employees and ensure that all employees are aware of the same.	

1 - Freely chosen Employment
[Summary of Findings]

1: Compliance Requirements
 1.1 There is no forced, bonded or involuntary prison labour.
 1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- Written policies displayed in Tamil (local language) and English.
- Worker interview, management interviews, worker behaviour, management behaviour and facility walkthrough did not evidence any area of concern.
- Hiring documents such as employment application, work contract copy included a statement affirming that applicants are seeking employment voluntary and are not under threat of any penalty, signed by each applicant, and maintained in the employees’ personal file.
- No deposit or original documents are collected and retained.
- Employees are free to leave their job on their own will prior notice and per the terms and conditions of the work contract.
- Movement of employees within the premises is not restricted and they are free to leave the facility after the normal course of assigned work schedule/shift.
- Factory tour and employees’ interview did not reveal restriction of movement or employees being subject to coercion.
- 10 personal files were verified on a sample basis, no original documents such as passport, National ID card kept by the facility. However, the facility has maintained copies of age proof and address proof as required by local law.
- The employment contract includes all the areas to be addressed with regard to the standards including working hours, remuneration and the benefits due to them.
- People are free to leave after the work. No overtime is being demanded as forced labour condition.
- The company does not withhold any or any part of the wage, benefits, property or documents in order to force such personnel to continue working for the company.
- Workers are free to terminate their services giving reasonable notice.

Evidence examined:

Details:

- Written policies and procedures on employment practice including recruitment, hiring, termination etc.,
- Management interview.
- Training records.
- Worker interviews.
- Worker personal file review (10 files).

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:

<p>Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p>
<p>Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>It was noted during record review and worker interaction that the facility has not made any restriction on workers freedom to terminate their employment. As per the contractual obligation subject to the legal requirements, workers are free to terminate the employment by giving notice to the employer.</p>
<p>If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Not applicable, No such business or part of business is based or registered in UK.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>There is no evidence of any restriction on workers freedoms to leave the site at the end of the work day.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The facility has maintained written policy and procedure and communicated it to all third parties including suppliers.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory tour and worker interviews did not reveal restriction of movement or employees being subjected to any coercion. The employees are free to leave the factory after their scheduled work shift.</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:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- The facility has documented the system for compliance to this requirement.
- The factory has written policy and procedure which states that workers have the fundamental right to lawful assembly or to form unions or take part in similar kind of association or group which give them the opportunity to address worker grievance and workplace issues collectively. However, Union agreement is not mandatory requirement as per the Trade Union Act,1926.
- Employees are free to join any union or association.
- The facility has formed different form of worker committees such as worker committee, health and safety committee, Grievance committee, Internal compliant Committee etc with regular meeting. Meeting records of all these committees submitted for review.
- Management has an open-door policy to address the employee's needs as revealed during employee interview session.
- Complaints/Suggestion boxes kept within the toilet/washrooms are opened weekly and complaints/suggestions are addressed immediately.
- The organisation does not discriminate, penalise, threaten, restrict or interfere with workers choosing to lawful form of association or join any Trade Union.
- Committee election record dated 5th November, 2022.
- Health and safety committee meeting record dated 18th July, 2023(6 members), 13th May 2023 (6 members) 7th March, 2023(6 members).
- Worker committee and Grievance redressal committee meeting record dated 19th July, 2023(6 members), 16th May, 2023(6 members) and 8th March 2023(6 members).
- Internal complaint committee meeting record dated 18th July, 2023 (7 members), 13th May, 2023 (7 members), 7th March, 2023 (7 members).
- NGO member Ms. Gayathri representing "Native Medicare Charitable Trust (Reg.No.448/1988)" participated in the Internal Compliant Committee. NGO agreement dated 7th March, 2023 valid for 1 year. NGO awareness program dated 18th July 2023 verified.

Evidence examined:

Details:

- Written policies and procedures on Freedom of Association and Collective Bargaining verified.
- Management interview.
- Training records.
- Worker interviews.
- Suggestion from suggestion boxes and suggestion box register
- Worker committee meeting records.
- Internal Compliance Committee meeting records.
- Laws of the land applicable are Indian Trade Union Act,1926 & Industrial Dispute Act, 1947. •Article19(1)9(c) of the Indian Constitution.

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:	Worker Committee, Grievance redressal committee, Internal compliant committee with external NGO participation, Health and 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 have made an open-door policy and employees are free to approach management on any matters of human rights violation. Suggestion boxes available in washrooms to report any issues anonymously. Employees are also encouraged to report any such issues directly to the Manager HR by telephone. Telephone numbers of Manager HR & Compliance displayed on the notice board The name and contact details of the Inspector of Factories have also been displayed on the notice board.
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: No union established by the facility. Trade Union is not mandatory. However, the facility allows workers to form or join any trade union activities.
Name of union and union representative, if applicable:	Not applicable. No union exists.
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?	1. Healthy committee. 2. Grievance redressal committee. 3. Works committee. 4. Internal complaint committee.
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: It was confirmed during worker interview. Committee members participated in opening meeting and interview session.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-11-05
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:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	<ul style="list-style-type: none"> •Health and safety committee meeting record dated 18th July, 2023(6 members), 13th May 2023 (6 members) 7th March, 2023(6 members). • Worker committee and Grievance redressal committee meeting record dated 19th July, 2023(6 members), 16th May, 2023(6 members) and 8th March 2023(6 members). •Internal complaint committee meeting record dated 18th July, 2023 (7 members), 13th May, 2023 (7 members), 7th March, 2023 (7 members). •NGO member Ms. Gayathri representing “Native Medicare Charitable Trust (Reg.No.448/1988)” participated in the Internal Compliant Committee. NGO agreement dated 7th March, 2023 valid for 1 year. NGO awareness program dated 18th July 2023 verified.
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:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- The facility has maintained written health and safety plan and that indicates how all health and safety issues are being managed by the facility.
- The plan includes what steps the facility is taking to ensure that health and safety risk areas are being identified and addressed.
- Mr. G.B Ramkumar- Managing Partner, Akalya-HR Executive are responsible to implement the local law regulations and training and communication.
- Fire license with reference number 1538/2023, K. Dis 8467/B1/2023 dated 16th June, 2023, valid for one year, issued by the District Officer, Fire and Rescue Services, Tirupur.
- Emergency evacuation drill record dated 13th July, 2023(time taken for evacuation: 120 seconds), 4th May, 2023(time taken for evacuation: 113 Seconds) and 29th March, 2023(time taken for evacuation: 100 seconds). Mock drill conducted by Hi Tech Technologies.
- Fire emergency preparedness and firefighting training record dated 13th July, 2023(25 employees) and 25th January, 2023(17 employees) Training conducted by Hi Tech Technologies.
- Building stability certificate dated 23rd June, 2023 valid up to 22nd June, 2026, issued by Er. M. Senthil Marimuthu. (Competency number H1/7689/2022, valid from 18th May 2022 to 17th May 2025).
- Approved building layout plan with reference number R.Dis.E/2804/2023 dated 21st June, 2023.
- Sanitary certificate with reference number 4789/A4/2023 dated 15th June, 2023 valid for 1 year, issued by the Deputy Director of Health and Services, Tirupur.
- It was noted during audit process that the facility has provided first aid training to 4 employees dated 22nd June 2023 valid for 1 year by an approved agency “ Tamil Nadu Apex Skill Development Centre for Health care.
- Electrician licence with reference number B 111504 (Mr. C. Elasi), valid from 22nd January 2021 to 21st January 2025. Electrical maintenance agreement dated 30th June 2023 verified.
- Compressor inspection report with reference number PV1.URF/Newly registered (2 compressors) dated 16th June, 2023, valid for 6 months, issued by the Joint Director of Industrial Safety and Health, Tirupur.
- Goods lift inspection report (1 goods lift) dated 24th June, 2023, valid for 6 months, issued by S. Sathishkumar(Competent person, Number H1/21154/2021 dated 1st April, 2022 to 31st march 2025).
- Generator (40 KVA of 1 generator) approval letter with reference number 724/EI/TPR/REG32/23 dated 14th June 2023, issued by the Electrical Inspectorate, Tirupur.
- Drinking water test report with reference number NO-DW-296/2023-2024 dated 23rd June 2023, valid for 6 months issued by MK Enviro Solutions.
- Ambient air quality test report with reference number AAQ-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Indoor air quality test report with reference number IAQ-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Stack emission(40 KVA Generator) check report with reference number SES-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Illumination test report with reference number IILS-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Noise level test report (workplace)with reference number INLS-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- E-waste agreement with M/s Trittech Systems dated 19th June 2023 valid for 1 year. Environmental permit number 22EF247515392 dated 27th August 2022 valid up to 31st March 2027.
- Waste oil disposal agreement with M/s Shri Sathya Sai Lubricants dated 20th June 2023 valid for 1 year. Environmental permit number 19HRC27929821 dated 5th December, 2019 valid up to 31st March, 2024.
- Risk Assessment record dated 1st April, 2023.
- Internal audit report dated 1st August, 2023.
- Management review meeting record dated 2nd August, 2023.
- It was verified that there are visible, appropriate and accessible fire extinguishers available.
- The facility has equipped with firefighting equipment such as fire extinguishers, smoke detectors, fire call point, emergency light system, sand/water bucket etc., as per the industry standard.
- First aid kits with adequate medicines.
- Emergency contact number displayed at multiple locations.
- Documents related to accident reporting maintained by the facility. There were no injuries reported.
- Health & safety awareness training provided by the facility during induction and periodical basis.
- The facility has adequate ventilation, illumination, and work environment maintained as per the industry standard.
- Adequate drinking water station, washroom/toilet for male and female workers provided as per the industry standard.
- Safety instructions such as machine safety warning, PPE guidelines etc are displayed at various places in local language Tamil and English.
- Emergency evacuation plan displayed at multiple locations/all floors.

- Emergency light and exit signage light box, exit indication observed at all required places including exit point, stairways.
- Electrical cabinet box observed safe as per the industry standard.
- Name and pictures of health and safety responders displayed by the facility.
- All workers are covered by workplace accident insurance scheme.
- Waste disposal agreement with authorised agency for cotton waste, machine oil/hazardous waste and other industrial waste available for review.
- Safe storage of machine oil, soft solvents for housekeeping observed.
- The facility has displayed Material Safety Data Sheet for diesel and soft solvents.
- Details of Health & Safety equipment:
Total number of Fire extinguishers 21
Total number of fire trained employees 25
Total number of first aid boxes 3
Total number of first aid trained workers 4
Number of male toilets/urinals 7
Number of female toilets 7
Number of drinking water points 3
Number of hand wash points 3
Number of emergency exit doors 3
Number of exit doors 3
Number of smoke detectors 35
Number of UPS connected lights 10
Number of hooter 10 /siren 1
Number of fire alarm call point 10
Number of evacuation plan 4
Number of emergency lights 9
Number of fire buckets 4

Evidence examined:

Details:

- Written policies and procedures on working conditions are safe and hygienic. •Licenses, certificates.
- Management interview.
- Training records.
- Worker interviews.
- Health & Safety training records.
- Health and Safety committee meeting records.

Any other comments:

None.

<p>Does the facility have general and occupational Health & 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>The facility has maintained written policies and procedures on health and safety. The facility has displayed all policies and procedures on notice board at multiple locations.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility has included all relevant policies in workers manual/employee hand book and briefly described in work contract.</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>No structural addition observed. Approved building plan cross checked with current layout.</p>

<p>Are visitors to the site informed on H&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>Safety warning and guidelines displayed at the main entrance of the facility. Appropriate PPE provided to visitors.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not applicable. Total number of workers of this audited facility is below 500, hence ambulance room/clinic/first aid room is not a mandatory 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:</p> <p>Doctor/Nurse not a requirement as per the law.It was noted during audit process that the facility has provided first aid training to 4 employees dated 22nd June 2023 valid for 1 year by an approved agency “ Tamil Nadu Apex Skill Development Centre for Health care.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not a requirement as per the law.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No dormitory provided. Not a requirement as per the law.</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>It was noted during record review and management interview that the facility has conducted periodical health and safety risk assessment as per the industrial safety standards in line with the legal requirements.</p> <ul style="list-style-type: none"> •Risk Assessment record dated 1st April, 2023. •Internal audit report dated 1st August, 2023. •Management review meeting record dated 2nd August, 2023.

<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:</p> <ul style="list-style-type: none"> •Environmental permit/consent order for Air and Water: Not applicable. This audited facility is listed under “White Category”. •Generator (40 KVA/1 generator) approval letter with reference number 724/EI/TPR/REG32/23 dated 14th June 2023, issued by the Electrical Inspectorate, Tirupur. •Drinking water test report with reference number NO-DW-296/2023-2024 dated 23rd June 2023, valid for 6 months issued by MK Enviro Solutions. •Ambient air quality test report with reference number AAQ-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions. • Indoor air quality test report with reference number IAQ-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions. • Stack emission(40 KVA Generator) check report with reference number SES-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions. • Illumination test report with reference number IILS-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions. • Noise level test report (workplace)with reference number INLS-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions. •E-waste agreement with M/s Trittech Systems dated 19th June 2023 valid for 1 year. Environmental permit number 22EF247515392 dated 27th August 2022 valid up to 31st March 2027. •Waste oil disposal agreement with M/s Shri Sathya Sai Lubricants dated 20th June 2023 valid for 1 year. Environmental permit number 19HRC27929821 dated 5th December, 2019 valid up to 31st March, 2024.
<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:</p> <p>It was noted during verification process that the facility has safe and secure usage and storage of diesel and soft solvents. No banned chemicals used by the facility.</p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600180591	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic / not clean	
Subcategory	Hygiene Facilities & Housekeeping	
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	<p>In accordance with Rule 40 and 45 of the Tamil Nadu Factories Rules 1950. Rule 40: Latrines to conform to public health requirements: Latrines other than those connected with an efficient water-home sewage system, shall comply with the requirements of the Public Health authorities. Rule 45: Urinals to conform to public health requirements: Urinals other than those connected with efficient water borne sewage system, and urinals in a factory wherein more than two hundred and fifty workers are ordinarily employed shall comply with the requirements of the Public Health authorities.</p>	
ETI code	3.3 - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.	
Explanation to the non compliance	It was noted during audit process that the male and female toilets and washrooms located at the periphery building(shed number 2) observed without hand wash basins as per the public health requirements.	
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 should provide hand wash basins with running water supply, hand wash liquid soap, means of drying hands/toilet paper etc., as per the public health standards in line with the legal requirements.	

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

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- The facility has maintained written policy on child labour and worker recruitment that ensured the minimum legal age of workers corresponds to all local laws and other international obligations.
- The age of each worker verified prior to employment through document review and interview session by the HR and compliance department.
- Updated personal files maintained with work contract, address proof and age proof copy.
- The facility has ensured that no worker is recruited below the legal minimum age.
- No child labour, young worker employed by the facility.
- Youngest worker details: Age: 21 years above.
- The facility has established child labour remediation policy.
- 10 personal files verified on a sample basis.
- Worker interview confirmed that the facility has neither recruited not employed any worker below the legal age.

Evidence examined:

Details:

- Written policies and procedures on child labour, young worker.
- Management interview.
- Training records.
- Worker interviews.
- Personal file review including age proof.

Any other comments:

None.

Legal age of employment:	15
Age of youngest worker found:	21
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: No worker under the age of 18 observed during onsite verification.

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:

<p>The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.</p> <ul style="list-style-type: none"> •Applicable Minimum wage (notification) for employment in Hosiery Manufacturing: As per the G.O(2(D)No.5 Labor and Employment (J1), dated January 1, 2016 Notification number II(2)/LE/120/2016. Published in TN Government Gazette, Part II, Section 2 dated February 17, 2016, Part II, Section 2 (page 127). Legal minimum wage with revised DA applicable from April 1, 2023 to March 31, 2024. (Worker Category/Basic wage (Monthly)/DA/ VDA(Monthly)/Total Wage Per month/Per day wage). <ol style="list-style-type: none"> 1.Cutter/Tailor/Machine Operator/Ironer/Packer/Fabrication: 4248.00+4176.00=8424.00/324.38 2.Checker:2448.00+4176.00=6624.00/254.77 3.Labelling: 2148.00+4176.00=6324.00/243.00 4.Handfolding:1998.00+4176=6174.00/237.46 5.Fold and tie like assistant=1848.00+4176.00=6024.00/231.69 •Minimum wage (basic +DA) paid by the facility(Daily in INR): <ul style="list-style-type: none"> Tailor INR 324 Cutter INR 324 Ironer INR 324 Packer INR 324 Checker INR 255 •As per the wage record review and benefits records, the facility is in compliance with the legal requirements. <ul style="list-style-type: none"> •Actual wage paid by the facility is above the legal minimum wage. • A total number 30 records (August 2023: 10 records, January 2023: 10 records and November 2022: 10 records) of wage and time records including other related benefits and deduction records verified on a sample basis. •The facility follows monthly payment system. No apparent peak season by the facility. •The facility has remitted Employee State Insurance contribution and Employee Provident Fund contribution since November 2022. The facility started its operation since November 2022. •Bonus payment provided to 13 employees @ 8.33% during settlement. •Annual leave encashment payment provided to 13 employees during settlement. •Legal leave (Earned leave benefits are provided to workers as per the eligibility criteria). •Basic Need Wage (BNW) has not fixed by the facility. However, the wage record verification and employee interview revealed that the facility is paying as per the legal minimum wage notification. •All workers were paid on a monthly basis. •The facility makes cash payment to all workers within first seven working days of every month. •Pay stub with details of payment provided to workers prior to payment. • No overtime work reported as per the sample record review. The facility follows the overtime calculation of 200% of the basic hourly rate in line with the legal requirement. •No piece rate work by the facility. •All workers paid as per the legal requirements. No violation reported during record review and worker interview. •There is no gender bias or any other form of discrimination observed.
<p>Evidence examined:</p> <p>Details:</p> <ul style="list-style-type: none"> •Written policies and procedures on wages and benefits. •Wages and benefit records, time records including attendance records, overtime work pay records, pay stubs, •Legal minimum wage notification. •Management interview. •Training records. •Worker interviews. •Personal file review including age proof. •Bonus records
<p>Any other comments:</p> <p>None.</p>

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 48.0 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: 231.69 Per Week: 1390.14 Per Month: 6023.94	Actual Per Day: 255.0 Per Week: 1530.0 Per Month: 6630.0	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: 463.38 Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wages Analysis:			
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)	A total number 30 records: August 2023: 10 records, January 2023: 10 records and November 2022: 10 records of wage and time records including other related benefits and deduction records verified on a sample basis.		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Legal minimum wage with revised DA applicable from April 1, 2023 to March 31, 2024. (Worker Category/Basic wage (Monthly)/DA/VDA(Monthly)/Total Wage Per month/Per day wage). 1.Cutter/Tailor/Machine Operator/Ironer/Packer/Fabrication: 4248.00+4176.00=8424.00/324.38 2.Checker:2448.00+4176.00=6624.00/254.77 3.Labelling: 2148.00+4176.00=6324.00/243.00 4.Handfolding:1998.00+4176=6174.00/237.46 5.Fold and tie like assistant=1848.00+4176.00=6024.00/231.69		
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.	As per the sample record review, the lowest wage paid by the facility is INR 255(daily wage) for checker category.		
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 payment provided to 13 employees @ 8.33% during settlement. Note: The facility started the operation since November 2022, hence yearly bonus system is not applicable. 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:	1. Employee Provident Fund Contribution deduction. 2. Employee State Insurance Contribution deduction. 3. Absent deduction.
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	1. Employee Provident Fund Contribution deduction @ rate of 12% of the earned gross minimum wage (basic +DA). 2. Employee State Insurance Contribution deduction @rate of 0.75% of the earned gross wages. 3. Absent deduction as per the local law.
Please list all deductions that have not been made.	None.
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: As per the working hours record review, it was noted that the work schedule including training, awareness session, mock drill, first aid or firefighting training etc.
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: Legal minimum wage with revised DA applicable from April 1, 2023 to March 31, 2024. (Worker Category/Basic wage (Monthly)/DA/VDA(Monthly)/Total Wage Per month/Per day wage). 1. Cutter/Tailor/Machine Operator/Ironer/Packer/Fabrication: 4248.00+4176.00=8424.00/324.38 2. Checker: 2448.00+4176.00=6624.00/254.77 3. Labelling: 2148.00+4176.00=6324.00/243.00 4. Handfolding: 1998.00+4176=6174.00/237.46 5. Fold and tie like assistant=1848.00+4176.00=6024.00/231.69
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: There was no discriminatory issue reported during the audit. The facility is paying wage as per the wage category.
How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input 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:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- The facility has engaged with one general day shift operation.
- All employees work 6 days in a week. Sunday is the weekly rest day for all employees. The facility has engaged with one general day shift operation.
- Working hours of the facility is from 8:30 am to 5:30 pm, lunch break is from 12:30 pm to 1:30 pm, Morning tea break is from 10:30 am to 10:45 am and evening tea from 3:30 pm to 3:45 pm.
- A total number 30 records (August 2023: 10 records, January 2023: 10 records and November 2022: 10 records) of wage and time records including other related benefits and deduction records verified on a sample basis.
- No apparent peak season by the facility.
- Working hours sample review details as follows:
 - a) August, 2023 (Current month): Maximum standard weekly working hours reported is 48.00 hours/weekly, the average weekly working hours of the sample review: 37.11 hours/weekly. No overtime working hours reported as per the sample review. (0 hour daily/ 0 hours weekly/ 0 hours monthly).
 - b) January 2023 (random month): Maximum standard weekly working hours reported is 48 hours, the average weekly working hours of sample review: 32.68 hours/weekly. No overtime working hours reported as per the sample review. (0 hour daily/ 0 hours weekly/ 0 hours monthly).
 - c) November 2022 (random month): Maximum standard weekly working hours reported is 48.00 hours, the average weekly working hours of sample review: 35.26 hours/weekly. No overtime working hours reported as per the sample review. (0 hour daily/ 0 hours weekly/ 0 hours monthly).
- As per the company policy, overtime is voluntary.
- National holidays, festival holidays and other holidays are being provided as per the local law regulation.
- List of holidays displayed on notice board.

Evidence examined:

Details:

- Written policies and procedures on wages and benefits.
- Wages and benefit records, time records including attendance records, overtime records, pay stubs.
- Legal minimum wage notification.
- Management interview.
- Training records.
- Worker interviews.
- Personal file review including age proof.

Any other comments:
None.

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Electronic time recording system implemented by the facility for all workers.
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6

Standard/Contracted Hours worked

Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Overtime Hours worked

Actual overtime hours worked in sample (State per day/week/month)	As per the company policy, overtime is voluntary.No overtime work (daily, weekly, monthly, quarterly) reported as per the sample record review.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such issue reported. Maximum standard weekly working hour reported is 48 hours. No overtime work reported as per the sample record review.

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:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- The facility has maintained written policy on discrimination practices subject to the local law and international obligations.
- There are both male and female workers recruited directly by the HR team without any ground of discrimination.
- The company has adopted a strict policy that prohibits discrimination on religion, race, colour, national or social origin disability, gender sexual orientation, family responsibilities, caste, union membership or political or ideology.

Evidence examined:

Details:

- Written policies and procedures discrimination.
- Management interview.
- Training records.
- Payroll records.
- Worker interviews.
- Personal file review including job application, appointment letter, job contract, salary increment
- EL records.

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 checked="" type="checkbox"/> No evidence of discrimination found
Please give details	No such issue reported during audit process.	
Professional Development		
What type of training and development are available for workers?	ETI base code training. General awareness training as per the local laws. Health and safety training including fire and first aid training. Covid 19 awareness training. Machine safety training. Technical induction training for production process.	

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)

Yes No

8 - Regular Employment Is Provided
[Summary of Findings]

8: Compliance Requirements

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
 Additional Elements: Responsible Recruitment
 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
 8.5 Employment agencies must only supply workers registered with them.
 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- Employer and employee relationship have been defined as per the Government of Tamil Nadu, Labour Department, Factories Act & other applicable labour laws and Rules, Trade Union Act, Industrial Disputes Act etc and international labour and human rights practices.
- Mr. G.B Ramkumar- Managing Partner, Akalya-HR Executive are responsible for all recruitment activities.
- The factory signs labour contract with employees at the time of employment as per the hiring policy and the terms of employment.
- All workers are recruited directly by the facility. No agency worker employed.
- No piece rate workers found during assessment.
- Overtime is voluntary. No overtime work reported as per the sample record review.
- No home workers employed by the facility.

Evidence examined:

Details:

- Written policies and procedures regular employment. •Management interview.
- Training records.
- Payroll records.
- Worker interviews.
- Personal file review including job application, appointment letter, job contract, salary increment, bonus record and EL records.

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"/> Same as actual conditions <input checked="" type="checkbox"/> Understood by workers
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
Migrant Workers	
Type of work undertaken by migrant workers:	Not applicable. No foreign migrant workers employed by the facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. No foreign migrant workers employed by the facility.
Is there any observation on this finding?	Not applicable. No foreign migrant workers employed by the facility.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable. No agency workers employed by the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. No agency workers employed by the facility.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. No agency workers employed by the facility.
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.)	

Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. The facility has not engaged with any contractors.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. The facility has not engaged with any contractors.

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:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

•Based from the interaction with the facility management and employees' interview, it was noted that all the core production is carried out with in the audited facility. However, Printing work sub contracted.

Evidence examined:

Details:

Written policy and procedure on sub-contracting verified.
Sub-contractor production records of printing verified.
No home workers system observed. .
Written policy and procedures on sub contract of production process.

Any other comments:

None.

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Process subcontracted	
Process Subcontracted	Printing
Name of factory	AGPL Rotary Printing
Address	SF.No.221/2D, Ponnan thottam, Murugampalayam, Iduvampalayam Post, Tirupur 641 687, Tamil Nadu, India.
Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on review of production records, the capacity with workers workload found balanced, hence no chance of unrecorded work hours.
If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility had already given an intimation to the main client.
Number of sub-contractors/agents used:	1
Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility has a policy that all the subcontractor of the facility should comply with the local legal regulation as well as their Clients Code of Conduct.

What checks are in place to ensure no child labour is being used and work is safe?	The facility has communicated ETI base code on 30th June 2023 to sub contracting facility. The facility representative visits the subcontracting unit on a regular time interval to ensure no child labour is being used.
Summary of homeworking – if applicable	
Is homeworking used at this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

9: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- The facility has a documented disciplinary practice and follows the laws of the land on this matter (Constitution of India, Trade Union Act, Industrial Dispute Act, Workmen Compensation Act).
- The facility has formed various type of committee to encourage worker to resolve their problems through adequate representation and dialogue.
- The facility has an open-door policy and employees are free to approach management on any matter of harsh or inhumane treatment issues. Suggestion boxes available in washrooms. Employees are encouraged to report any such issues directly to the Manager HR & Compliance or the head of the facility by telephone, SMS or by email.
- Telephone numbers and email ID of Manager HR & Compliance displayed on notice board and communicated to all employees through training session. The name and contact details of the Inspector of Factories have also been displayed on the notice board.
- The facility has formed different form of worker committees such as health and safety committee, Internal compliant Committee with NGO representation etc with regular meeting. Meeting records of all these committees submitted for review.
- Worker committee and Grievance redressal committee meeting record dated 19th July, 2023(6 members), 16th May, 2023(6 members) and 8th March 2023(6 members).
- Internal complaint committee meeting record dated 18th July, 2023 (7 members), 13th May, 2023 (7 members), 7th March, 2023 (7 members).
- NGO member Ms. Gayathri representing "Native Medicare Charitable Trust (Reg.No.448/1988)" participated in the Internal Compliant Committee. NGO agreement dated 7th March, 2023 valid for 1 year. NGO awareness program dated 18th July 2023 verified.

Evidence examined:

Details:

- Written policies and procedures on harsh or inhumane practices.
- Management interview.
- Committee meeting minutes.
- Training records.
- Personal file review.
- Worker interviews.

Any other comments:

None.

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?

Yes No

Please give details:

The facility has displayed contact details such as phone numbers police department, labour department, and various client grievance for open and anonymous way of reporting any violation subject to labour standards.

<p>If yes, are workers aware of these channels and have access? Please give details.</p>	<p>The facility has provided training on various types of committees and matters relating to sexual harassment and any violations of labour standards and the method of reporting incidents. Name and pictures of committee members displayed. No violation recorded from the minutes of the meeting. Suggestion Boxes are available in the washrooms. Telephone numbers of HR and compliance manager and group manager have been displayed on the notice board. Further, the name and contact details of the labour department Industrial Safety and Health has been displayed to report any incidence that may occur.</p>
<p>If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>The factory maintains an open-door policy, which provides easy access to the management. Various Committees have been established, contact details has been displayed. Adequate means for reporting violations and suggestion boxes are also available providing anonymity and safeguards to people who report the violations.</p>
<p>Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other</p>
<p>Please provide grievance mechanism details</p>	<p>Worker committee, Internal Compliant Committee, Grievance redressal committee.</p>
<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:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- All workers are Indian citizens, eligible to work anywhere in India.
- No foreign immigrant worker employed.

Evidence examined:

Details:

- Written policies and procedures on entitlement to work and immigration.
- Management interview.
- Personal file review.
- Worker interviews.

Any other comments:

None.

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

10B2: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The current system of the facility has been assessed through plant tour, document review, management interview and employee interviews. The assessment has been conducted as per the ETI Base Code and applicable local laws on a sample basis.

- Environmental permit/consent order for Air and Water: Not applicable. This audited facility is listed under “White Category”.
- Generator (40 KVA of 1 generator) approval letter with reference number 724/EI/TPR/REG32/23 dated 14th June 2023, issued by the Electrical Inspectorate, Tirupur.
- Drinking water test report with reference number NO-DW-296/2023-2024 dated 23rd June 2023, valid for 6 months issued by MK Enviro Solutions.
- Ambient air quality test report with reference number AAQ-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Indoor air quality test report with reference number IAQ-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Stack emission(40 KVA Generator) check report with reference number SES-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Illumination test report with reference number IILS-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- Noise level test report (workplace)with reference number INLS-296-2023-2024 dated 23rd June 2023, valid for 1 year issued by MK Enviro Solutions.
- E-waste agreement with M/s Trittech Systems dated 19th June 2023 valid for 1 year. Environmental permit number 22EF247515392 dated 27th August 2022 valid up to 31st March 2027.
- Waste oil disposal agreement with M/s Shri Sathya Sai Lubricants dated 20th June 2023 valid for 1 year. Environmental permit number 19HRC27929821 dated 5th December, 2019 valid up to 31st March, 2024.
- Risk Assessment record dated 1st April, 2023.
- Internal audit report dated 1st August, 2023.
- Management review meeting record dated 2nd August, 2023.

Evidence examined:

Details:

- Written policies and procedures environmental practices.
- Training records.
- Licenses/permission/certificates as per the legal requirements.
- Management interview.
- Worker interviews.
- Internal audit/risk assessment report/Environmental training records.

Any other comments:

None.

Attachments



Emergency exit illuminated light system.JPG



Smoke detector.JPG



Emergency light system.JPG



Time keeping machine.JPG



Toilets.JPG



Security hold aea.JPG



Emergency alarm system.JPG



Emergency exit.JPG



Building view.JPG



Fire control panel.JPG



Electrical panel board.JPG



Drinking water.JPG



Machine with needle guard.JPG



Hand wash basin.JPG



First aid box.JPG



Compressor.JPG



Emergency call point.JPG



Machine with eye guard.JPG



Fire extinguisher.JPG



Fabric storage.JPG



Packing section.JPG



Generator.JPG



Dining hall.JPG



Creche.JPG



Working hours displayed.JPG



Main entrance to the facility.JPG



Safe assebley point.JPG



Cutting section.JPG



Finished goods storage.JPG



Safety warning sign board displayed.JPG



Ironing section.JPG



Evacuation plan displayed.JPG



Abstracts of laws displayed.JPG



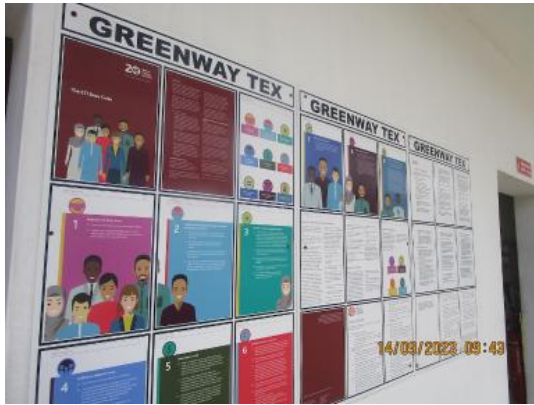
Sewing section.JPG



Checking.JPG



Compliant box.JPG



ETI base code displayed.JPG



Name board.JPG



Exit pathway marking.JPG



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Parking.JPG



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