

# Sedex Members Ethical Trade Audit Report



Audit Details										
Sedex Company Reference: (only available on Sed	ex System)	ZC1019028			Sedex Site Reference: (only available on Sedex System)			ZS1082597		
Business name (Company name)	:	HAMS G	arments Ltc	d						
Site name:		HAMS G	arments Ltc	t						
Site address:		Dakkhin Vangnahati, Sreepur, Gazipur Dakkhin Vangnahati, Sreepur, Gazipur Gazipur 1740 BD		Country:		BD				
Site contact and	job title:	Md. Mah	fuzur Rahm	nan / G	eneral Manage	er (HR,	, Admin	& Com	oliano	ce)
Site phone:		0173030	4152		Site e-mail:		robiul.sheikh@hams.co m.bd			
SMETA Audit Pillars:			oour Indards		Health and Safety (plus Environment 2-Pillar)		Environ 4-pillar	ment	\	Business Ethics
Date of Audit:		2023-10-	-23			•				
			Aud	it Com	pany Name:					
			Inte	ertek B	angladesh					
			Au	dit Cor	ducted By					
Affiliate Audit Company	$\checkmark$		Purchaser				Retailer			]
Brand owner			NGO				Trade U	nion		]
Multi- stakeholder		Combi				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:	Tanvir Ahmed Nabil	APSCA Number:	32200259			
Additional	Rokibul Hasan Mollah		32200261			
Auditors:	Md. Imran Khan		32200256			
	Amin Sharif		21703440			
	Umme Hunny Tabassum		21705348			
	Mohammad Salah Uddin		21701405			
Date of declaration:	2023-10-23					

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

Site Representation				
Full Name:	Md. Mahfuzur Rahman			
Title:	General Manager (HR, Admin & Compliance)			
Date of declaration:	2023-10-23			

### Comments:

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

None.

Audit company: Intertek Bangladesh Report reference: ZAA600030862

Start Date: **End Date:** 

2023-10-23

# **Summary of Findings**

Issue	Area of Non-Conformity		Nur	nber of iss	sues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
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	3.1 3.1 3.1 3.1 3.1 3.1 3.1	\$ 1 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5 \$ 5	7	0	0	NC - ZAF600209267 NC - 3834126b-0f43-4838- af0d-4d7613fc0d76 NC - 42c65e2d-27ec-4a63- 8666-3a5f5adbb915 NC - 1dfd0f4f-5b7a-4ef2- a9f0-6369d0854f8f NC - 88a17b83-00e6-4c18- b590-725f0702c42b NC - bf8316b5-5201-44e8- bb15-d89f7d931745 NC - fb3fc3a5-5894-447a- 982c-1cfdb2eb91d0
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	1	GE - 4b88615d-72e4-4d85- 8484-74eabf9b824b
6 - Working hours are not excessive			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
8 - Regular employment is provided	8.1	§8	1	0	0	NC - 03623a75-2898-4791- 98df-4b5f0027d83f
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is <u>allowed</u>			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 Bangladesh Energy Regulatory Act 2003, Act 27 (1): No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: - (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.

Audit company: Intertek Bangladesh Report reference: ZAA600030862

Start Date:

2023-10-23

End Date:

§ 2	In accordance with Bangladesh Labor Rules 2015, Rule 77 (1): At least one registered Physician shall be in each Treatment Unit of the institute or factory with the facility of dispensary. Additionally, at least one trained compounder or medical assistant, nurse and subordinate employee shall be employed for helping him/her, provided that at least two registered Physicians shall be recruited in case of an institute where more than three thousand employees/workers work, and necessary number of medical assistant and nurse shall be recruited for helping the Doctors.
§ 3	In accordance with Bangladesh Labour Rules, 2015, Rule 67(2): The arrangement of safety and health protection measures mentioned in Subsection (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, earmuffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials.
§ 4	In accordance with Bangladesh Labor Law 2006, Section 63(1) D (3): (63. Fencing of machinery. (1) In every establishment the following machinery, while in motion or in use, shall be securely fenced by the safeguards of substantial construction, namely: (d) Unless the following machinery are in such position or of such construction as to be safe to every person employed in the establishment as they would be if they were securely fenced- (3) Every dangerous part of any machinery).
§ 5	In accordance with Bangladesh Labour Law 2006, Section 72 (c): All floors, ways and stairways shall be clean, wide and clear of all obstructions.
§ 6	In accordance with Petroleum Act, 2016 section 6 (Ka): Notwithstanding anything contained in this Chapter a person need not obtain a license: a. For the transport or storage of class II & class III petroleum if the total quantity in his possession at any one place does not exceed two thousand litres and none of it is contained in a receptacle exceeding one thousand litres in capacity.
§ 7	In accordance with Bangladesh Labour Rules 2015, Rule 68 (4) and (5): (The owner of the institute shall conduct the physical fitness test of the workers on his/her own cost, by a registered Physician, for the activities that are described in Sub-section (1) and (2) and he/she would receive a Medical Certificate of each worker as per Form-26, certifying his fitness for performing the activities.)
§ 8	In accordance with Bangladesh Labor Rule - 2015 (Amendment 2022), Rule-19(5) & Amendment no - 07: Rule-19(5) Each owner will provide identity card with the photograph to each worker working in the firm at the costs of the owner as per Form-6. Amendment - 7: Every owner shall issue an identity card with photograph as per Form-6 to every worker employed in his establishment at the expense of the owner and the said identity card and appointment letter shall be issued in Bengali: Provided that, if necessary, the said identity card and appointment letter shall be issued in English.

### **Site Details**

Site Details					
Company Name	HAMS Garments Ltd				
Site Name	HAMS Garments Ltd				
GPS location (if available)	GPS Address:  South Vangnahati (Chapilapara), Bairgirchal. Sreepur, Gazipur.				
	Coordinates:	Latitude & Longitude: 24°11'35.2"N & 90°27'01.1"E			
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	• Factory license: 14453 /Gazipur 'L' category, issued by Deputy Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 10 May 2024. • Fire License: Fire License No: DD/Dhaka/ 21831/2009 issued by Bangladesh Fire Service & Civil Defence Authority which is valid till 30 June 2024. • Trade License: Trade License No: 63/23-24, issued by Sreepur Municipality which is valid till 30 June 2024.				
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All types of knit items.				

Report reference: ZAA600030862

Start Date: End Date: 2023-10-23 2023-10-23

2023-10-23 Sedex

Site description: (Include size, location, and age of site. Also, include structure and number of buildings)

 HAMS Garments Limited is located at South Vangnahati (Chapilapara), Bairgirchala, Sreepur, Gazipur. • The facility started its operation in 2010. • Total land area, production area and warehouse area of the facility are approximately 6,69,254 square feet, 2,92,935 square feet & 2,50,000 square feet respectively. • The facility has a total of 08 buildings & 18 sheds. Details of the building description are given in the following section. • The products manufactured at this site are all types of knit items. • Overall responsibility for compliance is taken by Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance). • A total of 4970 employees are currently working in the facility where 2883 are male employees and 2087 are female employees. Among 4970 employees, 568 employees are non-production employees & 4402 employees are production employees of which 2554 are male and 1848 are female. • The youngest worker on site was 20 years old. • The facility doesn't have any peak & off-peak season. • The site doesn't use any subcontractors. • All employees were hired for permanent positions. • Generally, the facility operates in one general shift starting from 08:00 am to 05:00 pm. Meanwhile, the facility provides a one-hour lunch break in three batches starting from 12:30 pm to 01:30 pm, 01:00 pm to 02:00 pm and 01:30 pm to 02:30 pm. Moreover, the facility operates three working shifts in the Knitting & Dyeing section starting from 06:00 am to 02:00 pm, 02:00 pm to 10:00 pm and 10:00 pm to 06:00 am respectively. Meanwhile, the facility provides one hour rest break in each shift. • Friday is a weekly holiday. Facility maintains rotation-based holiday for the workers of Dyeing & Knitting Section. • 75 employees were selected for interview including 45 male and 30 female employees, they were interviewed including male & female as 09 Groups of 05 and 30 employees were interviewed individually. • To verify wages and working hours 75 records were taken from September 2023 (Current paid month), April 2023 (Random month), January 2023 (Random month). • Audit scope for document review was one year. • Standard working hours on site were on average 208 hours/month with 1 day off in every 7-day-period. • Facility provides minimum wage to all employees as per local law (Bangladesh Government Gazette dated 24th January 2019). • Correct OT hours payments were paid 500% of basis bourly wage for OT paid; Employees were paid 200% of basic hourly wage for OT

Structure and number of buildings

Building Name:		Building (	)1
Floor	Description	n	Remark
Ground floor	Finish goo Inspection sticker pri & Admin C	n room, ´ nting, HR	None
1st floor	Sewing, C Sample ro	utting, om (UG)	None
2nd floor	Sewing, F Office.	inishing,	None
3rd floor	Sewing, F Conference Office are	ce room,	None
4th floor	Sewing, F Officer are	inishing, ea.	None
5th floor	Cutting, C Section	an van	None
6th floor	Dining, Merchandising room, Sample section, Prayer room, and Office area.		None
Roof top	Vacant		None
Building Name:		Building (	)2
Floor	Description	n	Remark
Ground floor	Fabric sto Shirt)	rage(T-	None
1st floor	Store (Und Garments Accessorie		None
2nd floor	Accessorie Store(T-Sl		None
3rd floor	Fabric Sto	re	None
4th floor	Sewing &	Finishing	None
5th floor	Fabric Sto	re	None
Roof top	Vacant		None
Building Name:		Building (	)3
Floor	Description	n	Remark
Ground floor	Generator, Boiler, Sub-station room.		None
Mezzanine flopor	LT Panel Room.		None
1st floor	Compress	or.	None
Roof top	Cooling to	ower	None

Duilding Name:		Building 0	.4
Building Name:			
Floor	Description		Remark
Ground floor	ETP area		None
1st floor	Blower ro testing ro	om, water om.	None
Building Name:		Building 0	5
Floor	Descriptio	n	Remark
Ground floor	Main secu Fire contr room	rity Post, ol Panels	None
Roof top	Vacant		None
Building Name:		Building 0	6
Floor	Descriptio	n	Remark
Ground floor	RMS room	<u> </u>	None
Building Name:		Building 0	7
Floor	Descriptio	n	Remark
Ground floor	Day care r Medical ro	oom, oom.	None
1st floor	Director office and Temporary rest room.		None
2nd floor	Staff Dinir Director o	ng, ffice	None
Roof top	Vacant		None
Building Name:	•	Building 0	8
Floor	Descriptio	n	Remark
Basement	Fire Hydra	ant pump	None
Ground floor	vacant		None
Building Name:	•	Shed 01	
Floor	Descriptio	n	Remark
Ground floor	Dyeing, Finishing, Chemical Sub- Store, Lab, Office room, Admin office, R&D, Dyes sub- Store.		None
Building Name:		Shed 02	
Floor	Descriptio	n	Remark
Ground floor	Knitting, office room		None
1st floor	Yarn Store & Gary fabrics store		None

Building Name:		Shed 03	
	Floor Description		Remark
Ground floor	•		None
Building Name:	Cerrerar se	Shed 04	Tronc
Floor	Description		Remark
Ground floor	Electrics,	•	None
	Mechanics	s wastage.	Tronc
Building Name:		Shed 05	
Floor	Description	า	Remark
Ground floor	Maintenar	nce Store	None
Building Name:		Shed 06	
Floor	Description	า	Remark
Ground floor	Chemical	Store-01	None
Building Name:		Shed 07	
Floor	Description	า	Remark
Ground floor	Chemical	Store-02	None
Building Name:	Building Name:		
Floor	Description	า	Remark
Ground floor	Gray Fabri	ics Store	None
Building Name:		Shed 09	
Floor	Description	า	Remark
Ground floor	Dyes Cher Store	nical	None
Building Name:	Shed 10		
Floor	Description	า	Remark
Ground floor	Construct Materials		None
Building Name:		Shed 11	
Floor	Description	า	Remark
Ground floor	Gray Fabri	ics Store	None
Building Name:		Shed 12	
Floor	Description	า	Remark
Ground floor	Left Over	Store	None
Building Name:		Shed 13	
Floor	Description	า	Remark
Ground floor	Wastage L & Empty C drum	ubricant Chemical	None

	Building Name:		Shed 14	Shed 14		
	Floor	Descriptio	n	Remark		
	Ground floor	Security b Shade	arrack	None		
	Building Name:		Shed 15			
	Floor	Descriptio	n	Remark		
	Ground floor	WTP area		None		
	Building Name:		Shed 16			
	Floor	Descriptio	n	Remark		
	Ground floor	Maintena shop	nce work	None		
	Building Name:		Shed 17			
	Floor	Description	n	Remark		
	Ground floor	Civil Office	е	None		
	Building Name:		Shed 18			
	Floor	Descriptio	n	Remark		
	Ground floor	Dining Sh	ade	None		
Visible structural integrity issues (large cracks) observed?	□ Yes ☑ No					
Clacks) Observed:	Please give details:					
	No such cracks found	d.				
Does the site have a structural engineer evaluation?	☑ Yes □ No					
evaluation.	Please give details:					
	Facility has a structural engineer evaluation approval. The facility took this approval from Sreepur Municipality on 04 August 2022. Moreover, Facility took machine Layout Approval from Department of Inspection for Factories and Establishments (DIFE) on 05 September 2022.					
Site function	□ Agent		☑ Facto Proces	ry ssing/Manufacturer		
	☑ Finished Product	t Supplier				
	□ Homeworker		□ Labou	ır Provider		
	□ Pack house		□ Prima	ry Producer		
	☐ Service Provider		□ Sub-c	ontractor		
Months of peak season						

	_	
Process overview	,Hydro M/C, Dyeing Machine,Cir Lock, Flat Lock, F/D, Baktbe, Ba Neddle, Slep Button, Smock, Pk Generator, Perkins Generator (I (Diesel), Transformer (REB), Cor Compressor No-02 (Boge), Com Compressor No-04 (comp air), C Denver), Boiler no-01 (Cochran), no-03 (Cochran), Submersible po2, WTP, Service pump-01, Serv 01, Boosting pump -02, Boosting Chemical used: Albafix Eco, Cros Rhwalbafluid Calbatex Ab-45alb Soda Ash Light Caustic Soda, C Clarite Cbb, Dicrylan Sd, Dng (Rc9, Contripon S, Jet Clean, E Acid, Sodium Bicarbonate, Forn Acid, Skyblue, Ultratex Ttk, Kap Univadine Dif, Univadine Top, G Powder, Toxal Tac, Mazyme Eco New, Persotex Afc, Persotex Frx All-Round Softener Flake S400, Primagreen Power Finish, Laus Dispersing Agent 710, Red And E	duction process: Knitting, ng & Packing. • Monthly pieces per month. • Machines ing machine, Sun super stenter ine, Sun super stenter machine. Slitting machine -02 (bianco), er machine (bianco), Tube tex mpactor machine, Bianco M/C (Finishing), Air turning m/c cular Knitting Machine, Over rteck, Button Stitch, Hole, 2/s/T, Kansai, Scolop, Caterpiller Diesel), Power Pro Generator mpressor No-01 (Boge), pressor No-03 (Atlas copco), Compressor No-05 (Gardener OB), Boiler no-02 (Thermax), Boiler nump-01, Submersible pumpice pump-03, ETP ETC. • Scolor Adm New, phobotex obstack Rihydrogen Peroxid 50% Glouber Salt, Claridon Prc, Clean Pn, Bio J1085, Tissocyl scoline 3027, Invatex Cs, Acetic nic Acid, Oxalic Acid, Neutra pacom E 12, Crosden Lpd, Greenbuff 1000, Greensoda 1000 of Toxal Jet/So, Croscolor Slr, Persoclean Stn, Low-Yellowing Primagreen Oxy Rtu, oft Me-2015, Sequestering And Black Fixing Agent Hf-8, Blue And de Softener, Soaping Agent Df-5, 72w, Nonionic Softener Flake Aca, Oxinol Cnw, Alkasoft-Wia, 200, Lubrimax Tl-E, Reactevo If Eco, Protelan Lga, Felosan le Fs-60, Phobol Cp-C, Phobol
What form of worker representation is	☐ Union	☑ Worker Commitee
there on site?	□ Other	□ None
Please give details:	Participation Committee.	
Is there any night production work at the site?	☑ Yes □ No	
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No Please give details:	
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No Please give details:	

2023-10-23

Were all site provided accommodation buildings included in this audit

□ Yes □ No

Please give details:

The facility does not provided accommodation buildings for workers.

Audit Parameters			
Time in and time out	Day 1		
	In	09:30	
	Out	17:15	
Audit type:	PERIOD	IC	
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Md. Mahfuzur Rahman / General Manager (HR, Admin & Compliance)		
Is further information available	No		

Audit attendance	Management	Worker Representatives		
	Senior management	Worker Committee representatives	Union representatives	
A: Present at the opening meeting?	Yes	Yes	No	
B: Present at the audit?	Yes	Yes	No	
C: Present at the closing meeting?	Yes	Yes	No	
Reason for absence at the opening meeting	There is no trade union at this facility and it is not mandated by law. However, the representative of Participation Committee was present during opening meeting.			
Reason for absence during the audit	There is no trade union at this facility and it is not mandated by law. However, the representative of Participation Committee was present during the audit.			
Reason for absence at the closing meeting	There is no trade union at this facility and it is not mandated by law. However, the representative of Participation Committee was present during closing meeting.			

## **Worker Analysis**

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

Worker Analysis								
	Local		Migrant*		Home			
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	2554	0	0	0	0	0	0	2554
Worker numbers – female	1848	0	0	0	0	0	0	1848
Total	4402	0	0	0	0	0	0	4402
Number of Workers interviewed – male	45	0	0	0	0	0	0	45
Number of Workers interviewed – female	30	0	0	0	0	0	0	30
Total – interviewed sample size	75	0	0	0	0	0	0	75

Report reference: ZAA600030862

Start Date: End Date: 2023-10-23 2023-10-23

	Nationalities Structure	
Nationality of Management	Bangladeshi	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: BANGLADESHI	approx %: 100%
Was this list completed during peak season?	☐ Yes ☑ No	
Season:	Please give details:	
	There were not any peak season round the year same production	n found at the audited facility, n process goes on.
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.

Report reference: ZAA600030862

Start Date: End Date: 2023-10-23

Is there any worker survey information available?

W	orker Interview Summary
Were workers aware of the audit?	☑ Yes □ No
Were workers aware of the code?	☑ Yes □ No
Number of group interviews:	09 Groups of 05
Number of individual interviews:	Male: 18 Female: 12
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	☑ Yes □ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	None.
What did the workers like the most about working at this site?	Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.
Any additional comment(s) regarding interviews:	Most employees enjoyed working at this facility, they felt they had sufficient wage and had a good relationship with management in general.
Attitude of workers to hours worked:	Very favourable as total working hour is within their limit and overtime is fully voluntary.

☐ Yes ☑ No

Please give details:

2023-10-23

#### Attitude of workers:

The employee had a generally favourable opinion of their place of employment and got along well with both co-workers and managers. They observed a kind and approachable management team. The workers were given the assurance of confidentiality and were free to express their opinions about the factory. All of the workers expressed satisfaction with their job at the factory and the payment of their agreed-upon salary. They were aware of the mandatory notice time and felt free to leave this employer. They were handled with respect by the facilities management. They felt free to voice their general issues to their participation committee representative, who would bring it up in the participation committee meeting, as well as to their supervisors or line managers directly.

### Attitude of worker's committee/union reps:

Interviews with participation committee members took place in private at a different location. They responded naturally when asked about their duties as members of the workers committee and said they had no trouble carrying out their regular tasks. Meetings of the participation committee are held often. Additionally, they said that they could offer advice on all aspects of the site's procedures.

### Attitude of managers:

The facility management showed a positive attitude to this audit and during the whole audit process Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance) along with his team was present through the audit process and co-operated the whole audit. Facility management honored the client's request and permitted the auditor to take pictures of every step of the manufacturing process, as well as of best practices and non-conformities. They also permitted auditors to communicate secretly with the staff while providing photocopies of the necessary paperwork. The facility management concurred with all the findings and recommended corrective measures at the closing meeting. The factory management had a system in place to compare existing practices to client requirements and local law, and they paid attention to the internal audit team's recommendations. They also had a Health & Safety committee to handle any issues relating to health and safety.

2023-10-23

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

**OA: 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

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

### **Current Systems and Evidence Examined**

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

### **Current Systems:**

- · The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.

  • The responsible person for implementation and monitoring is Mr. Md. Mahfuzur Rahman – General
- Manager (HR, Admin & Compliance).

The facility had identified their stakeholders and salient issues.

- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human
- rights.
   Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the report.

The facility has policy and procedures for human rights.
The facility communicates this code of conduct to the employees through notice board and orientation

• It is communicated to all appropriate parties, including suppliers through the responsible person.
Evidence examined:
<ul> <li>Written policies and procedure that being provided individually to employees.</li> <li>All policies of facility.</li> <li>Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.</li> </ul>
Any other comments:
None.

Policy statement that expresses commitment to respect human rights?	☑ Yes □ No
	Please give details:
	The facility has a social compliance policy which is a commitment to respect human rights.

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Are the policies included in workers' manuals?	☑ Yes □ No
manads.	Please give details:
	The facility provides workers manual to the workers where all the policies and applicable govt. law are included.
Does the business have a designated person responsible for implementing	☑ Yes □ No
standards concerning Human Rights?	Please give details:
	The facility has a designated person who responsible for implementing standards concerning Human Rights. • Name: Mr. Md. Mahfuzur Rahman • Job title: General Manager (HR, Admin & Compliance)
Does the business have a transparent	☑ Yes □ No
system in place for confidentially reporting, and dealing with human rights	Please give details:
impacts without fear of reprisals towards the reporter?	The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes □ No
Does the business demonstrate effective data privacy procedures for workers'	☑ Yes □ No
information, which is implemented?	Please give details:
	The facility uses worker register and software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.
Me	easuring Workplace Impact
Annual worker turnover(Number of	Last year 5.0%
workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	This year 4.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	2.0%
Annual % absenteeism(Number of days	Last year 4.0%
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)	This year 3.0%

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% of workers that work on average more than 60 total hours / week in the last 6 / 12 months

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	1.0%	
Are accidents recorded?	☑ Yes □ No	
	Please give details:	
	All the minor and major injuries register. Last injury was occurre was minor left hand index finge	ed on 17 October 2023 which
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	2.0%
	This year	2.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	1.0%	
Lost day work cases per 100	Last year	0.0%
workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more	6 month	0.0%
than 48 standard hours / week in the last 6 / 12 months	12 month	0.0%

6 month

12 month

0.0%

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:**

 Responsibility for meeting the legal and client code requirements is taken by Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance).

The facility communicates this code of conduct (COC) to the employees through notice board and

orientation training.

The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
The facility conducts orientation training for all new employees.

• Supplier communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.

• Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.

• Facility conducts internal audit to identify their improvement areas and taking corrective actions. Facility conducted last internal audit on 10 April 2023.

### **Evidence examined:**

- Employee handbook.
- Facility Code of Conduct (COC).All policies of facility.

Legal license (Factory, Fire, Trade)

Internal audit records.

Management employee training, training attendance record

Meeting records.

Supplier selection policy.

any other comments:	
lone.	

Management Systems		
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	☐ Yes ☑ No	
non-compliance to any regulations?	Please give details:	
	In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.	

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Do policies and/or procedures exist that reduce the risk of forced labour, child	☑ Yes □ No
labour, discrimination, harassment &	Please give details:
abuse?	It was noted through documentation review, facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	It was noted through the management and workers interview that overtime is voluntary for all employees. No child labour was found in the facility during the facility tour and age verification certificate found in all the reviewed personal files.
Have managers and workers received training in the standards for forced	☑ Yes □ No
labour, child labour, discrimination,	Please give details:
harassment & abuse?	All the employees in the facility have received orientation training where standards for forced labour, child labour, discrimination, harassment & abuse are covered. Last orientation training was held on 21 October 2023 with 20 participants and conducted by Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance).
If Yes, is there evidence (an indication)	☑ Yes □ No
that training has been effective e.g. training records etc.? Please give details	Please give details:
	Training records were found including picture and attendance sheet.
Does the site have any internationally recognised system certifications e.g. ISO	☑ Yes □ No
9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	Please give details:
other social addits):	The site has some recognised social audits e.g., WRAP (Valid till 21 August 2024), BSCI (Valid till 16 August 2025).
Is there a Human Resources manager/department?	☑ Yes □ No
manager, acparement.	Facility has a dedicated Human Resources department consisting of 22 members and is headed by Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance).
Is there a senior person /manager responsible for implementation of the	☑ Yes □ No
code?	Please give details:
	Responsibility for meeting the legal and client code requirements is taken by Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance).
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No
information is confidential?	Please give details:
	The facility has an IT security policy which ensures worker information is confidential.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes □ No
	Please give details:
	The facility has an effective key control procedure to keep the information confidential.

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Are risk assessments conducted to evaluate policy and procedure	☑ Yes □ No
effectiveness?	Please give details:
	Facility has conducted risk assessment on 25 January 2023.
Does the facility have a process to address issues found when conducting	☑ Yes □ No
risk assessments, including	Please give details:
implementation of controls to reduce identified risks?	The facility has system to raise the issue found in risk assessment and to implement the way of reduction it.
Does the facility have a policy/code which require labour standards of its own	☑ Yes □ No
suppliers?	Please give details:
	Facility has a supplier selection policy which ensures labour standard of its own supplier.
	Land Rights
Does the site have all required land rights	☑ Yes □ No
licenses and permissions (see SMETA Measurement Criteria)?	Please give details:
	Facility has approved lay-out plan and building approval from concern authority.
Does the site have systems in place to	☑ Yes □ No
conduct legal due diligence to recognize and apply national laws and practices	Please give details:
relating to land title?	The facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
Does the site have a written policy and	☐ Yes ☑ No
procedures specific to land rights?	Please give details:
	Not applicable.
Is there evidence that facility/site compensated the owner/lessor for the	☑ Yes □ No
land prior to the facility being built or	Please give details:
expanded?	The facility acquired and used the land according to the legal procedure and project's requirement.
Does the facility demonstrate that alternatives to a specific land acquisition	☑ Yes □ No
were considered to avoid or minimize	Please give details:
adverse impacts?	The facility has all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.
Is there any evidence of illegal appropriation of land for facility building	☐ Yes ☑ No
or expansion of footprint?	Please give details:
	It was noted through land ownership agreement review and management interview that the facility does not go through illegal appropriation of land for facility building.

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

Version 6.1

1: Compliance Requirements

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

### **Current Systems and Evidence Examined**

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

### **Current Systems:**

- The factory has a policy which prohibits forced labour, and this was also available for review.
  Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.Service book is provided to every employee.

The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.

The facility does not use any prison labour.

• The above was confirmed in management and employee interview.

### **Evidence examined:**

- Factory rules.
- Policy on No-Forced labour and prison labour.
- Sample employee personal files.
- Service book.
- Time record.

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)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No  Please give details:  Facility has a policy mentioning Workers are free to terminate employment from the facility.
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?	☐ Yes ☐ No ☑ Not Applicable  Please give details:  Facility has UK based business, but its turnover doesn't cross £36m.

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Is there evidence of any restrictions on workers' freedoms to leave the site at	☐ Yes ☑ No
the end of the work day?	Please give details:
	The employees can leave their workplace after their respective duties.
Does the site understand the risks of forced / trafficked / bonded labour in its	☑ Yes □ No □ Not Applicable
supply chain	Please give details:
	Facility has forced labour and bonded labour policy; also, they have no such type of labour.
Is the site taking any steps taking to reduce the risk of forced / trafficked	☑ Yes □ No
labour?	Please give details:
	The facility has policy on forced/trafficked labour. The facility maintains it through notice board on production floor. Overtime is total voluntary. Employees can leave their workplace freely after their respective jobs.

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

2: Compliance Requirements

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational

activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their

representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **Current Systems and Evidence Examined**

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

### **Current Systems:**

- All the employees can form or join the trade union/Participation Committee of their choice.
- There is no trade union in the facility but there is a Participation Committee formed by election.
  Participation Committee is formed on 06 June 2023.

Regular Participation Committee meeting is held. Last meeting held on 07 October 2023.

- Meeting minutes are posted in notice board and recorded in a register.
  There are 24 members in participation committee (12 members on behalf of Management side and 12 members on behalf of workers side).
- $\cdot$  PC members are not treated less favourably or more favourably than other workers.
- PC members can carry out their duties within working hours without affecting their pay.

### Evidence examined:

- Freedom of association policy review.
- Participation Committee formation records.
- Participation Committee member list.
- Participation Committee meeting register.
- Participation Committee meeting minutes.
  Participation Committee meeting attendance register.

# 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)	☐ Union☐ Other	<ul><li>☑ Worker Commitee</li><li>☐ None</li></ul>
Other details:	Participation Committee.	
Is it a legal requirement to have a union?	☐ Yes ☑ No	
Is it a legal requirement to have a worker's committee?	☑ Yes □ No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<ul> <li>✓ Yes □ No</li> <li>Please give details:</li> <li>Facility has an effective grievance can submit their grievance verbs welfare officer or complain box.</li> </ul>	ce handling procedure. Workers ally or in written through
Is there evidence of free elections?	☐ Yes ☑ No	

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Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<ul><li>☑ Yes ☐ No</li><li>Please give details:</li><li>Facility has a policy regarding Freedom of Association. Regular</li></ul>
	Participation Committee meeting is held, and meeting minutes are posted on notice board.
Name of union and union representative, if applicable:	Not applicable.
Is there evidence of free elections?	☐ Yes ☑ No ☐ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation committee of 24 members (12 members on behalf of Management side and 12 members from workers side).
Is there evidence of free elections?	☑ Yes □ No □ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes □ No
representatives are.	Please give details:
	PC members name with picture are posted in the notice board.
Were worker representatives freely elected?	☑ Yes □ No
Date of last election:	2023-06-06
Do workers know what topics can be raised with their representatives?	☑ Yes □ No
Were worker representatives/union representatives interviewed?	☑ Yes □ No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Participation committee meeting held in every two months. Last meeting held on 07 October 2023 and meeting topic was as below,  • Discussion on previous meeting agenda. • Discussion on member inclusion for empty positions. • Discussion on increasing tiffin bill & iftar bill.
	<ul> <li>Discussion on grievance policy.</li> <li>Miscellaneous.</li> </ul>
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

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

3: Compliance Requirements

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

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated

for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

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

### **Current Systems and Evidence Examined**

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

### **Current Systems:**

### 1.General Health and Safety management

a)Mr. Md. Mahfuzur Rahman – General Manager (HR, Admin & Compliance) as President looks after Health & Safety issues for the site.

b)Potable water was freely available in all areas. There was a total of 192 drinking water stations found at

the facility.

c)Facility management signed a medical agreement with Al Hera Hospital, Mawna, Gazipur to provide good health service to the workers within limited cost. This agreement is valid till 03 October 2027.

d)Enough clean toilets (113 for male and 65 for female) segregated by gender were always available for

e)Ventilation, temperature, and lighting was adequate for the production processes.

### 2. Fire Safety

a)There are 02 or more exits in each room.

b) Enough assembly area was found in front of the facility building.

c)Firefighting equipment was adequate, and checks were up to date. Facility checked all fire equipment monthly schedules wise.

d)Public Address system, fire hose and fire alarm found active throughout the facility. e)Aisles exit way and employees were found free from any blockage. f)Facility has one responsible Fire safety officer. g)The facility has a trained firefighting team consisting of 346 firefighters & 346 rescuers.

h)Facility conducts fire drill on regular basis.

### Fire Drill Information:

a)Last fire drill: Day (Internal) / Date: 23 August 2023/ Time took: 01 min 58 Sec / Employees were present: 5119 / Fire drill monitored by: General Manager (HR, Admin & Compliance).

b)Last fire drill: Day (Internal) / Date: 03 June 2023/ Time took: 01 min 25 Sec / Employees were present: 197 / Fire drill monitored by: General Manager (HR, Admin & Compliance).

c)Last fire drill: Day (External) / Date: 18 September 2023 / Time took: 02 min 25 Sec / Employees were present: 5167 / Fire drill monitored by: Deputy Asst. Director – FSCD.

### 3. Electrical, Machine & fire safety

a)All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse

b) The facility has 15 electricians who check and do inspection, roster wise for whole facility.

c)The facility has 04 generators for the power supply throughout the facility. d)Facility checks all electric channels, electrical distribution board and electric connection daily and monthly schedule wise.

### 4. Chemical safety

a)The facility does not use any hazardous chemical for their production process.

b) Material Safety Data Sheets and labelling were found for chemicals.

### 5. Medical services

a) There were 53 first aid boxes with sufficient kits in the full facility.

b) There were 346 internally certified first aid responders.

c)The facility has appointed 01 doctor who sits in the facility six days a week, 02 nurses & 02 medical assistants who are available all the time.

d)In medical room facility has total 05 medical beds segregated for male & female (02 for male, 02 for female & 01 Emergency bed).

### 6. Dormitory

a) The facility didn't provide dormitory facilities to any employees.

### 7. Trainings to Employees

Facility management provides different training courses to employees to enhance their knowledge and

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### Trainings:

a)Orientation Training / Last Date of training: 21 October 2023 / Participants: 20 / Trainer Designation: Executive - Welfare / Frequency of training: As required.

b)Fire Fighting Training (Internal) / Last Date of training: 17 October 2023 / Participants: 35 / Trainer Designation: Officer – Fire & Safety / Frequency of training: Monthly.

c)Fire Fighting Training (External) / Last Date of training: 11 & 12 October 2023 / Participants: 40 / Trainer Designation: Officer – Fire & Safety / Frequency of training: Monthly.

d)Personal Protective Equipment (PPE) Training / Last Date of training: 15 October 2023 / Participants: 25 / Trainer: Designation: Executive - Welfare / Frequency of training: monthly.

e)First Aid Training / Last Date of training: 11 October 2023 / Participants: 35 / Trainer: Designation: Medical Officer / Frequency of training: monthly.

f)Mid-level management Training / Last Date of training: 16 September 2023 / Participants: 20 / Trainer: Designation: Executive - Admin / Frequency of training: monthly.

g)Chemical Handling Training/ Last Date of training: 06 September 2023 / Participants: 20 / Trainer: Designation: Manager - ECR / Frequency of training: Two months.

h)Environment Management Training / Last Date of training: 21 September 2023 / Participants: 24 / Trainer, Designation: Manager - ECR / Frequency of training: Two months.

### 8. Test Reports:

Facility management conducts different tests to maintain a safe & healthy working environment which will offer the employees a better convenient workplace.

### **Test Reports Information:**

- a)Test Name: Drinking water test / Institution Name: Department of Public Health Engineering / Date: 28 March 2023.
- b)Test Name: Air Quality Assessment / Organization Name: Envoage Sustainable Solutions / Date: 25 September 2023.
- c) Test Name: Noise Level Test / Organization Name: Envoage Sustainable Solutions / Date: 25 September 2023.

### **Evidence examined:**

- · License review: Fire license.
- Building approval plan.
- Group insurance.
- · Water test report.
- Injury record and analysis report.Machine and electric maintenance record.
- Risk assessment report.
- Training record: Fire training, First aid training, PPE training, MSDS training, Health and safety training.
  Fire drill record.
- Health and safety committee record.Electric installation checking record.

- Training records and certificates.
  Fire equipment maintenance records.
- Fire drill records.
- Accident reports.Chemical list and MSDS for each chemical.
- Health and safety policy.Potable water testing certificates.

Any other comments:		
None.		
Does the facility have general and occupational Health & Safety policies and	Yes	□ No

Does the facility have general and occupational Health & Safety policies and	☑ Yes □ No
procedures that are fit for purpose and are these communicated to workers?	Please give details:
are these communicated to workers:	The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.
Are the policies included in workers' manuals?	☑ Yes □ No
manuats:	Please give details:
	The facility provides workers manual to the workers where all the policies and applicable govt. law are included.
Are there any structural additions without required permits/inspections (e.g. floors	□ Yes ☑ No
added)?	Please give details:
	No additional structures were found with building construction approval.
Are visitors to the site informed on H&S and provided with personal protective	☑ Yes □ No
equipment?	Please give details:
	All the visitors to the site are informed on H&S and provided with personal protective equipment where necessary.
Is a medical room or medical facility provided for workers?(This section is to	☑ Yes □ No
list evidence to support system	Please give details:
description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	The facility has medical facility for the employees. Equipment's are provided as per legal requirements.
Is there a doctor or nurse on site or there is easy access to first aider/ trained	☑ Yes □ No
medical aid?	Please give details:
	The facility has 01 doctor, 02 nurses and 02 medical assistants for medical treatment of the employees.

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Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent	☑ Yes □ No
	Please give details:
persons e.g. buses and other vehicles?	Facility provides transport facilities (Vehicle: Bus) to the workers. Those transport were fit for use and operated by the competent persons.
Is secure personal storage space provided	☐ Yes ☑ No
for workers in their living space and is fit for purpose?	Please give details:
	Not applicable as the facility doesn't provide any living space or accommodation facility for workers.
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?	☑ Yes □ No
	Please give details:
	The facility conducts risk assessment for their people to reduce identified risk. Last risk assessment conducted on 25 January 2023.
Is the site meeting its legal obligations on	☑ Yes □ No
environmental requirements including required permits for use and disposal of	Please give details:
natural resources?	The facility management has conducted noise quality assessment as required by law.
Is the site meeting its customer requirements on environmental	☑ Yes □ No
standards, including the use of banned	Please give details:
chemicals?	The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.

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	Non-C	ompliance		Evidence
[Back to findings	summary]			
	Non-C	ompliance		
Status	CLOSED			
Reference	ZAF600209267			7
Clause	3 - Working Con	ditions are Safe a	ınd Hygienic	
Issue Title	267 - No / inade machinery, or n law	quate certificates nachines not regi	for inspections of stered as required by	,
Subcategory	Machinery			7
New or carried over?	□ New	☑ C	arried Over	
Raised by audit	ZAA421717242			
Resolved by audit	ZAA600030862			
Root cause	☐ Training	□ Sy	ystem	
	□ Costs	□ La	ack of workers	
	☑ Other			
Root cause - Other	Delay from concerned authority			
Local law issue	In accordance with Bangladesh Energy Regulatory Act 2003, Act 27 (1): No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: - (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) energy storage.			
ETI code	hazards. Adequaccidents and in associated with by minimising,	ne industry and of ate steps shall be njury to health ari 1, or occurring in t	he course of work, ably practicable, the	
Explanation to the non compliance	It was noted through documents review and management interview that, facility CCP license for generating 3.678 MW was found expired on 12 July 2022. However, facility applied for renewal the captive power plant (CPP) license to Bangladesh Energy Regulatory Commission dated on 16 June 2020, but not received.			
Follow up method	☐ Follow up au	udit ☑ D	esktop audit	
Timescale	□Immediate	☑ 30 days	□ 60 days	
	□90 days	□120 days	□180 days	

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	□ 365 days □ Other
Actions	It is recommended that the facility should have a valid Captive Power Plant License for all the generators from the concerned authority.
Additional comments	We have achieved certificate from BERC. After getting CPP license please upload. We obtained CPP from concerned authority on 06 August 2023 which will be valid till 28 June 2024. Facility obtained valid CPP from concerned authority and was able to show objective evidence during audit day. Hence, NC closure is recommended.

Non-Compliance			Evidence	
[Back to findings	summary]			
	Non-C	ompliance		]
Status	OPEN			
Reference	3834126b-0f43-	4838-af0d-4d761	3fc0d76	1
Clause	3 - Working Con	ditions are Safe a	and Hygienic	1
Issue Title	314 - Medical fa requirements	cilities do not me	eet legal	
Subcategory	Worker Health			
New or carried over?	☑ New	□ C	arried Over	
Root cause	☐ Training	☑ S	ystem	
	□ Costs	_ L	ack of workers	
	□ Other			
Root cause - Other				
Local law issue	Rule 77 (1): At le in each Treatme the facility of di trained compou subordinate em him/her, provid Physicians shal where more tha work, and nece and nurse shall	In accordance with Bangladesh Labor Rules 2015, Rule 77 (1): At least one registered Physician shall be in each Treatment Unit of the institute or factory with the facility of dispensary. Additionally, at least one trained compounder or medical assistant, nurse and subordinate employee shall be employed for helping him/her, provided that at least two registered Physicians shall be recruited in case of an institute where more than three thousand employees/workers work, and necessary number of medical assistant and nurse shall be recruited for helping the Doctors.		
ETI code	accidents and in associated with by minimising,	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Explanation to the non compliance	It was noted through facility tour and management interview that facility did not have 2 full time registered Physician as per legal requirement. However, facility appointed 01 doctor who provide medical care to the employees 6 days in a week and facility has 02 nurse and 02 medical assistant to support the medical officer.			
Follow up method	☐ Follow up au	udit ☑ D	esktop audit	] [
Timescale	□Immediate	☑ 30 days	□ 60 days	
	□90 days	□120 days	□180 days	
	□ 365 days	□Other		

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Actions	It is recommended that the facility management should recruit another 01 full time doctor as per the legal requirement.	

	Non-Com	pliance		$\Box$	Evidence
[Back to findings summary]					
	Non-Com	pliance			
Status	OPEN	-			
Reference	42c65e2d-27ec-4a	63-8666-3a5f5	adbb915		
Clause	3 - Working Condit	ions are Safe	and Hygienic		
Issue Title	278 - Personal Prot but incidents of wo appropriate	ective Equipr orkers not usir	nent (PPE) provided ng PPE where		
Subcategory	Personal Protectiv	e Equipment/	Clothing		
New or carried over?	☑ New	□ C	arried Over		
Root cause	☑ Training	□ S	ystem		
	□ Costs	□ L	ack of workers		
	□ Other				
Root cause - Other					
Local law issue	Rule 67(2): The arra protection measur the concerned mai necessary equipment	angement of s es mentioned nufacturing in ent's, includ	in Sub-section (1), stitute must provide		Spot removing workers not wearing PPE.jpeg
ETI code	hazards. Adequate accidents and inju- associated with, or	ndustry and o steps shall be by to health ar occurring in ar as is reason	e taken to prevent ising out of, the course of work, nably practicable, the		Sewing operator not wearing face mask.jpeg
Explanation to the non compliance	building 1. b) 04 or using required pro	% of total over vere not using I cutting secti culate matter ut of 06 emplo tective gear (I chemical apro	lock, flat lock and gface masks in the	,	
Follow up method	☐ Follow up audit	. ✓ D	esktop audit		
Timescale	□Immediate	☑ 30 days	□ 60 days		
	□90 days	□ 120 days	□180 days		
	☐ 365 days	□ Other			





Actions	It is recommended that the facility should provide and ensure the proper use of the mentioned PPE for the mentioned area.	

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	Evidence			
[Back to findings	[Back to findings summary]			
	Non-Compliance			
Status	OPEN			
Reference	1dfd0f4f-5b7a-4ef2-a9f0-6369d0854f8f			
Clause	3 - Working Conditions are Safe and Hygienic			
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)			
Subcategory	Machinery			
New or carried over?	☑ New ☐ Carried Over			
Root cause	☐ Training ☐ System			
	☐ Costs ☐ Lack of workers			
	☑ Other			
Root cause - Other	Lack of monitoring			
Local law issue	In accordance with Bangladesh Labor Law 2006, Section 63(1) D (3): (63. Fencing of machinery. (1) In every establishment the following machinery, while in motion or in use, shall be securely fenced by the safeguards of substantial construction, namely: (d) Unless the following machinery are in such position or of such construction as to be safe to every person employed in the establishment as they would be if they were securely fenced- (3) Every dangerous part of any machinery).  Eye guard foun displaced.jper			
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.			
Explanation to the non compliance	Based on site tour it was noted that, eye safety guard found displaced at 10 out of 30 randomly checked overlock machines as well as 08 out of 20 randomly checked flatlock machines which are located at sewing section on the 1st to 4th floors of building 01.			
Follow up method	☐ Follow up audit ☑ Desktop audit			
Timescale	□ Immediate ☑ 30 days □ 60 days			
	□ 90 days □ 120 days □ 180 days			
	□ 365 days □ Other			
Actions	It is recommended that facility should ensure appropriate machine guards for all of its machines.			

**Non-Compliance Evidence** [Back to findings summary] **Non-Compliance** Status **OPEN** Reference 88a17b83-00e6-4c18-b590-725f0702c42b Clause 3 - Working Conditions are Safe and Hygienic Issue Title 207 - Isolated occurrence of blocked fire exits Subcategory Fire Safety - Fire exits New or carried □ Carried Over ✓ New over? Root cause □ Training □ System □ Costs □ Lack of workers ☑ Other Root cause -Lack of monitoring Other Local law issue In accordance with Bangladesh Labour Law 2006, Section 72 (c): All floors, ways and stairways shall be clean, wide and clear of all obstructions. ETI code 3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, Aisle found partially associated with, or occurring in the course of work, blocked.jpeg by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Based on site tour during audit it was noted that, 08 of 20 passageways were found partially obstructed by different component like garments carton, Explanation to the non compliance finished carton, table, machines, trolleys, garments sacks, other raw material on 1st to 4th floor of building 1 at cutting, sewing, and finishing section. Follow up ☐ Follow up audit Desktop audit method Timescale □ Immediate ☑ 30 days □ 60 days □90 days □ 120 days □ 180 days ☐ 365 days □ Other Actions It is recommended that facility management should keep all the walkways free of obstruction in mentioned area for easy evacuation in case of

emergency.

	Non-Compliance	Evidence	
[Back to findings	summary]		
	Non-Compliance		
Status	OPEN		
Reference	bf8316b5-5201-44e8-bb15-d89f7d931745		
Clause	3 - Working Conditions are Safe and Hygienic		
Issue Title	235 - Legally required chemical licence expired / not in place including any reporting to government bodies on list of hazardous chemicals on site		
Subcategory	Chemicals		
New or carried over?	☑ New ☐ Carried Over		
Root cause	☐ Training ☐ System		
	☐ Costs ☐ Lack of workers		
	□ Other		
Root cause - Other			
Local law issue	In accordance with Petroleum Act, 2016 section 6 (Ka): Notwithstanding anything contained in this Chapter a person need not obtain a license: a. For the transport or storage of class II & class III petroleum if the total quantity in his possession at any one place does not exceed two thousand litres and none of it is contained in a receptacle exceeding one thousand litres in capacity.		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Explanation to the non compliance	It was noted through facility tour that facility stored 6080 litters diesel during audit date, but no permission was taken from legal authority to store the diesel.		
Follow up method	☐ Follow up audit ☐ Desktop audit		
Timescale	□ Immediate □ 30 days □ 60 days		
	□90 days □120 days □180 days		
	□ 365 days □ Other		
Actions	It is recommended that facility should have valid license for storing their diesel.		



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	Non-Compliance	Evidence	
[Back to findings	summary]		
	Non-Compliance		
Status	OPEN		
Reference	fb3fc3a5-5894-447a-982c-1cfdb2eb91d0		
Clause	3 - Working Conditions are Safe and Hygienic		
Issue Title	318 - Inadequate / isolated failure in conducting medical examinations/ occupational health checks of workers in hazardous situations (e.g. noise / chemicals / dust)		
Subcategory	Worker Health		
New or carried over?	☑ New ☐ Carried Over		
Root cause	☐ Training ☐ System		
	☐ Costs ☐ Lack of workers		
	☑ Other		
Root cause - Other	Lack of monitoring		
Local law issue	In accordance with Bangladesh Labour Rules 2015, Rule 68 (4) and (5): (The owner of the institute shall conduct the physical fitness test of the workers on his/her own cost, by a registered Physician, for the activities that are described in Sub-section (1) and (2) and he/she would receive a Medical Certificate of each worker as per Form-26, certifying his fitness for performing the activities.)		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Explanation to the non compliance	Based on document and interview during verification that, no occupational health checks found for the 06 of 10 employees who are involved with hazardous job duty as well as chemical contact at dyeing section of the facility to determine the occupational exposers.		
Follow up method	□ Follow up audit ☑ Desktop audit		
Timescale	□ Immediate □ 30 days ☑ 60 days		
	□ 90 days □ 120 days □ 180 days		
	□ 365 days □ Other		
Actions	It is recommended that facility should arrange for health check-up records for all employees working in hazardous areas.		

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

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

• The facility has established a practice that they will never employ and use any child labour.

• The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.

• Factory verifies the workers age through registered doctors.

• Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photocopied national identification card and other documents.

• There was no child or young employee observed in the facility.

#### **Evidence examined:**

Recruitment policy

Policy on No-Child labour.

• Personal file including Birth certificate, primary/secondary education certificate, National ID card, etc. of sample employees.

Age verification documents.

#### Any other comments:

None.

Legal age of employment:	18
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No
	Please give details:
	Not applicable.

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#### 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:**

The facility is providing local legal minimum wage BDT 8000/month for all the employees.

Time keeping system is electronic finger punch system.

· All workers are 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.

Benéfits of paid, annual leave; maternity bénefit to appropriate workers.

All social insurance payments were passed on to the relevant authorities in a timely manner.

All employees were paid through Mobile Banking (BKash).
Each employee was given a pay slip and signed for their wages.
Employees are aware of their minimum wage.

Wages have been recorded according to documents checked.
There are some good practices by the facility; see below GE section.

 Salary sheet and timecard review from September 2023 (Current paid month), April 2023 (Random month), January 2023 (Random month).

#### **Evidence examined:**

- Salary sheet review.
- Overtime payment record review.

Payslip review.

- Attendance register review.
- Production record review.
- Maintenance register review.
- Maternity benefit register review.
- Leave record review.
- Final settlement record review.

#### Any other comments:

#### None.

Summary Information				
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?	
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO	

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Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 4.0 Per Week: 24.0 Per Month: 104.0	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 52.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 8000.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 8000.0	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: 39.0 Per Week: null Per Month: null	Actual Per Day: 39.0 Per Week: 0.0 Per Month: 0.0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	☑ Yes □ 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)	month), · · 75 samples taken f	rom September - 2023 rom April - 2023 (Randrom January - 2023 (R	dom month),
Are there different legal minimum wage grades? If Yes, please specify all.	Pyes □ No  The Government announced pay structure on 24th 2019 for the workers of the Garments Industries with from December 2018. / As per Bangladesh Government published on 24th January 2019: / Grade 01 Pattern Masic salary Tk. 10938, House rent Tk. 5469, Medical T Conveyance allowance 350, food allowance 900 Total 18257.00 / Grade 02 / a) Mechanic/ Electrician, b) Cutt master: Basic salary Tk. 9044, House rent Tk.4522, Me 600, Conveyance allowance 350, food allowance 900 Tk.15416.00. / Grade 03 / Sample Machinist/Senior Op Basic salary Tk. 5330, House rent Tk.2665, Medical Tk. Conveyance allowance 350, food allowance 900, Total Tk.9845.00. / Grade 04 / Sewing machine operator: Batk. 4998, House rent Tk. 2499, Medical Tk. 600, Conveyallowance 350, food allowance 900, Total Tk. 8875.00. / Grade 04 / Sewing machine operator: Basic salary Tk. House rent Tk.2342, Medical Tk. 600, Conveyance allowance 900, Total Tk. 8875.00. / Grade 04 / Sewing machine operator: Basic salary Tk. 4380, House Tk.2190, Medical Tk. 600, Conveyance allowance 900, Total Tk. 8875.00. / Grade 07 / Sewing machine operator: Basic salary Tk. 4380, House Tk.2190, Medical Tk. 600, Conveyance allowance 350, allowance 900, Total Tk. 8420.00. / Grade 07: Assistan machine operator: Basic salary Tk.4100, House rent T Medical Tk. 600, Conveyance allowance 350, food allowance 350, f		stries with effect Government Gazette 1 Pattern Master: 2, Medical Tk. 600, 2e 900 Total Tk. 2ian, b) Cutting Tk.4522, Medical Tk. 2 wance 900 Total 2 t/Senior Operator: 2 Medical Tk. 600, 3 te 900, Total 3 perator: Basic salary 4 600, Conveyance 5 Tk. 9347.00. / Grade 6 c salary Tk. 4683, 6 eyance allowance 7 C Grade 06 / General 7 C Grade 06 / General 7 C Grade 07 C Grade 8 C Salary Tk. 4683, 8 Eyance allowance 8 C Salary Tk. 4683, 8 Eyance allowance 9 C C Grade 06 / General 9 C C Salary Tk. 4683, 8 Eyance allowance 9 C C Grade 06 / General 9 C C Grade 06 / General 9 C C Grade 07 C Grade 9 C C Grade 07 C Grade 9 C C Grade 08 / General 9 C C Grade 08 / General 9 C C Grade 08 / General
If there are different legal minimum grades, are all workers graded and paid correctly?	paid   ✓ Yes   ☐ No   ☐ 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?	<ul><li>□ Below legal min</li><li>☑ Above</li></ul>	☑ Meet	
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	8000 BDT		

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Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 10.0% of workforce earning minimum wage 90.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:Facility provides monthly attendance bonus to all the employees as per company policy. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.		
	As per Bangladesh Finance Act 2022; factory may deduct BDT 20 for Government Revenue Stamp.		
Have these deductions been made?	☑ Yes □ No		
Please list all deductions that have been made.	Un-authorized absence		
Please list all deductions that have not been made.	<ul><li>Personal Protective Equipment (PPE).</li><li>Apron etc.</li></ul>		
Were appropriate records available to verify hours of work and wages?	☑ Yes □ No		
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No		
Do records reflect all time worked? (For	☑ Yes □ No		
instance, are workers asked to attend meetings before or after work but not	Please give details:		
paid for their time)	The facility shows all real records which reflect all scenarios.		
Is there a defined living wage:	☐ Yes ☑ No		
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.	Please give details:		
If yes, what was the calculation method	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage		
used.	☐ Figures provided by ☐ Living Wage Foundation UK		
	☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation		
	□ Other – please give details:		
Are there periodic reviews of wages? If	☑ Yes □ No		
Yes give details (include whether there is consideration to basic needs of workers	Please give details:		
plus discretionary income).	Yearly 5% to 10% increment.		
Are workers paid in a timely manner in line with local law?	☑ Yes □ No		
Is there evidence that equal rates are	☑ Yes □ No		
being paid for equal work:	Please give details:		
	Through payroll records review and employee's interviews, it was confirmed that equal rates are being paid for equal work.		

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How are workers paid:	□ Cash		Cheque
	□ Bank Transfer	<b>~</b>	Other
If other, please explain:	Mobile Finance Banking (BKash).		

	Good Example	Evidence
[Back to findings	s summary]	
	Good Example	
Status	OPEN	
Reference	4b88615d-72e4-4d85-8484-74eabf9b824b	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	☑ New ☐ Carried Over	
Explanation to the good example	Facility provides attendance bonus to all employees as per company policy.	
Evidence	Verified from document review, worker and management interview.	

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

6: Compliance Requirements

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

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

week

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

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

6.5 below.

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

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

#### **Current Systems and Evidence Examined**

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

#### Current Systems:

- Through employees' interview, overtime is voluntary.
- Time keeping system is an electronic finger punch system.

All overtime is compensated at a premium rate for all employees.

- Generally, Friday is a weekly holiday. Facility maintains rotation-based holiday for the workers of Dyeing & Knitting Section.
- Salary sheet and timecard review from September 2023 (Current paid month), April 2023 (Random month), January 2023 (Random month).

#### **Evidence examined:**

- Employees' interviews.Management interview.
- local laws.
- Facility policy on working hours.
- Salary sheet.
- Payslip.
- Job card.
- Attendance register.
- Production record.
- Quality and production records to cross check hours.

Any other	comme	nts:
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None.

Working hours' analysis		
Systems & Processes		
What timekeeping systems are used?	Electronic finger punch system.	
Is sample size same as in wages section?	☑ Yes □ No	
	Please give details:	

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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.)	☑ Yes □ No
Are there any other types of contracts/employment agreements used?	□ Yes ☑ 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.)	☐ Yes ☑ No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)
Is this allowed by local law?	☑ Yes □ No
Maximum number of days worked without a day off (in sample):	6
Stand	ard/Contracted Hours worked
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ 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.)	☑ Yes ☐ No Circular dated 17 May 2023 from labour ministry: By virtue of Section 324 of the Bangladesh Labour Act, 2006 (Act No. 42 of 2006), the Government has, in the interest of the public, allowed 100, 102 and 105 of the provisions of Sections 100, 102 and 105 of the export-oriented garment industry for 06 (six) months from 17 April 2023 to 16 October 2023. Exempted from application under the following conditions. 1. According to rule number 214 of the fifteenth chapter of Bangladesh Labour Rules- 2015, the amount has to be paid to the central fund at a certain rate; 2. Bangladesh Labour Act, 2006 and Bangladesh Labour Rules, 2015 shall be followed; 3. Work of more than 04 (four) hours in any working day by any worker without his consent; 4. Wages must be paid at twice the normal wage for additional work; 5. Weekly leave shall be provided as per rules; 6. Only willing workers may be assigned overtime; 7. Ensure that workers work in compliance with health regulations; 8. Government decisions issued from time to time regarding Corona Virus (Covid-19) transmission where applicable Instructions must be followed.
	Overtime Hours worked
Actual overtime hours worked in sample (State per day/week/month)	- September 2023 (Current paid month), 02 hours per day & 12 hours per week found.
	- April 2023 (Random month), 02 hours per day & 12 hours per week found.
	- January 2023 (Random month), 02 hours per day & 12 hours per week found.

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Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No	
vertime nours – total) over ou lound:	Please give details:	
	Combined hours (standard or contracted + overtime hours = total) found 60 hours which was not more than 60 hours per week.	
Approximate percentage of total workers on highest overtime hours:	70.0%	
Is overtime voluntary? (Please detail evidence e.g. Wording of contract /	☑ Yes ☐ No ☐ Conflicting Information	
employment agreement / handbook / worker interviews / refusal arrangements)	Please give details:	
worker interviews / relusar arrangements/	Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.	
	Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	☑ Yes □ No □ N/A – there is no legal requirement to OT premium	
wages,	Please give details:	
	Overtime payments for employees are as per legal requirement. 200% of standard wages.	
Is overtime paid at a premium?	☑ Yes □ No	
	Overtime payments are paid to 100% employees as per legal requirements.	
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	□ No □ Consolidated □ Collective □ Bargaining □ agreements □ Other	
Please give details	Not applicable, facility provides 200% OT premium.	
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any	☐ Overtime is voluntary ☐ Onsite Collective ☐ Safeguards are in bargaining allows 60+ hours/week is voluntary ☐ Safeguards are in place to protect worker's health and safety	
checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Site can ☐ Other reasons demonstrate (please specify) exceptional circumstances	
Please give details	Not applicable.	
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not applicable.	
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No	
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	□ Yes ☑ No	

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

7: Compliance Requirements

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

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

# Policy of Anti-Discrimination. Recruitment policy. Training record. Termination records. Female employee rights.

Any other comments:
None.

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 97.09	%	Female: 3.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	No such women wer	e working in the faci	lity.
Is there any evidence of discrimination based on race, caste, national origin,	☐ Hiring	☐ Compensation	☐ Access to training
religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Promotion	☐ Termination or retirement	<ul><li>No evidence of discrimination found</li></ul>
Please give details	No such evidence found.		
Professional Development			
What type of training and development are available for workers?	Orientation Training. First Aid Training. PPE Training. Chemical Handling Training. Health & Safety training.		

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Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	□ 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 specifications to impart skills or provide regular employment, and shall apprent to impart skills or provide regular employment, and shall apprent skills or provided the same and shall apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and

intermediaries against legal and/or ethical requirements.

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

legislation. 8.5 Employment agencies must only supply workers registered with them. 8.6 Workers pay no recruitment fee at any stage of the recruitment process.

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.

No subcontractors were used.

- All employees are getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees.

#### **Evidence examined:**

- Recruitment policy.
- Employees personal file.
- Appointment letter.
- Employee service book.
- New employee joining register.

Any ot	her	com	me	nts:
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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?	<ul><li>☑ Terms &amp; Conditions presented</li><li>☑ Same as actual conditions</li></ul>	☑ 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)	□ Yes ☑ No	

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Migrant Workers		
Type of work undertaken by migrant	Not applicable.	
workers:	Not applicable.	
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0	
Are migrant workers' voluntary deductions (such as for remittances)	□ Yes ☑ No	
confirmed in writing by the worker and is	Please give details:	
evidence of the transaction supplied by the facility to the worker?	Not applicable.	
Is there any observation on this finding?	Not applicable.	
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	□ Yes ☑ No	
	Non-employee workers	
Recruitment Fees		
Are there any fees?	☐ Yes ☑ No	
	rced from a local agent who are not directly paid by the site, but 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	0	
Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☑ No	
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No	
Is there a legal contract agreement with	☐ Yes ☑ No	
all agencies?	Please give details:	
	Not applicable.	
Does the site have a system for checking labour standards of agencies?	☐ Yes ☑ No	
	Please give details:	
	Not applicable.	
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?	☐ Yes ☑ No	
	Please give details:	
	Not applicable.	
Do all contractor workers understand	☐ Yes ☑ No	
their terms of employment?	Please give details:	
	Not applicable.	

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**Non-Compliance Evidence** [Back to findings summary] **Non-Compliance** Status **OPEN** Reference 03623a75-2898-4791-98df-4b5f0027d83f Clause 8 - Regular Employment Is Provided Issue Title 534 - Information about internal rules and regulations is not available e.g. by providing handbooks or terms & conditions for workers and it is a legal requirement Terms of Employment/Engagement Subcategory New or carried □ Carried Over ✓ New over? Root cause □ Training □ System □ Costs □ Lack of workers Other Lack of monitoring Root cause -Other Local law issue In accordance with Bangladesh Labor Rule - 2015 (Amendment 2022), Rule-19(5) & Amendment no - 07: Rule-19(5) Each owner will provide identity card with the photograph to each worker working in the firm at the costs of the owner as per Form-6. Amendment - 7: Every owner shall issue an identity card with photograph as per Form-6 to every worker employed in his establishment at the expense of the owner and the said identity card and appointment letter shall be issued in Bengali: Provided that, if necessary, the said identity card and appointment letter shall be issued in English. ETI code 8.1 - To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. Explanation to It was noted through workers' ID card review & the non management interview that, randomly checked 17 out of 20 workers working in the training center were found without worker's identity card. compliance Follow up ☐ Follow up audit ☑ Desktop audit method Timescale □ Immediate ☐ 60 days □90 days □ 120 days □ 180 days

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□ Other

It's recommended that facility management should provide all workers' ID card as per prescribed form.

☐ 365 days

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## 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:
<ul> <li>No Sub-contracting and Homeworking were used by this facility.</li> </ul>
Evidence examined:
<ul> <li>Shipment record.</li> <li>Goods in and out register.</li> <li>Production record.</li> <li>Goods in and out gate pass / records.</li> </ul>
Any other comments:
None.

Summary of sub–contracting – if applicable					
Is there any sub-contracting at this site?	□ Yes	☑ No			
Summary of homeworking – if applicable					
Is homeworking used at this site?	□ Yes	☑ No			

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

9: Compliance Requirements

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

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

• The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Through the facility management and employees' interview, it was noted that no physical abuse

happened in the facility.

• There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

## \* Anti-Harassment policy. \* Grievance box open register. \* Orientation training record. 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:		
of any other grievances to a 3rd party:	Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. The facility has a designated channel to conduct grievance handling procedure.		
If yes, are workers aware of these channels and have access? Please give details.	All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complaint box.		
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Facility has posted hotline & provided grievance box in washroom.		
Which of the following groups is there a grievance mechanism in place for?	☑ Worker	□ Communities	
	□ Suppliers	□ Other	
Please provide grievance mechanism details	Facility declared grievance procedure for workers and staffs to report any instances of harassment and encourage them to do so. grievance boxes have been posted in a confidential area thorough which one can raise his/ her grievance to management. The grievance boxes are opened by or on behalf of top management once a week and the issues are solved immediately. Also, there were hot line no. posted to file detailed grievance		

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Are there any open disputes?	☐ Yes ☑ No
	Please give details:
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)	✓ Yes □ No Please give details:
Is there a published and transparent disciplinary procedure?	☑ Yes □ No  Please give details:
If yes, are workers aware of these the disciplinary procedure?	✓ Yes □ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

#### 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:**

- During document review and worker interview it was found that all workers are directly employed by the factory and that all employees had been issued appointment letters and were recruited following the process defined in the recruitment procedure.
- From document review, factory management representative and worker interview, it was observed that all workers in the factory were Bangladeshi and 100% were Bangladeshi workers and no permission is required for working from one district to another district.

• All workers had the proper legal rights to work in this region.

 All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes.

No agency staff or foreign worker was used by the factory.
The factory recruits new worker through posting recruiting advertisement on newspaper, banner, some of production employees were introduced by fellow-villagers.

• The workers have not paid any deposit when they were recruited in the factory.

• There were not any deductions for items such as travel and equipment.

#### **Evidence examined:**

- Facility recruitment policy.
- Employees personal file.

#### Any other comments:

None.

End Date:

#### 10B4 - Environment 4-Pillar [Summary of Findings]

10B4: Compliance Requirements

10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is

communicated to all appropriate parties, including its own suppliers.

10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for

10.B4.7 Businesses shall make continuous improvements in their environmental performance.

10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.

10B4: Guidance for Observations 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the

10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
  The facility also provides awareness training to all related personnel.

- Solid waste has been handover to licensee vendor as per local legislation who recycled that wastage. Facility has a wastage distribution agreement with M/S Doha Enterprise, Konabari, Gazipur which is validity till 31 December 2026.
- · Facility conducts air emission & noise level test on a regular frequency. Last air emission and Noise level test was conducted by Envoage Sustainable Solutions on 25 September 2023. All the parameter of those report was found within the acceptable limit.

#### **Evidence examined:**

- · Facility environment policy and procedure.
- Environment management system documents.

Air and noise test report.

Water and energy consumption register.

Wastage register.

- Water and energy consumption register.Contract for wastage disposal.

#### Any other comments:

None.

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	Environmental Analysis			
Is there a manager responsible for Environmental issues (Name and Position):	Name: Rajib Chandra Acharjee Title: Manager (ECR)			
Has the site conducted a risk assessment	☑ Yes □ No			
on the environmental impact of the site, including implementation of controls to	Please give details:			
reduce identified risks?	The site has conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks. Facility also has Environmental impact assessment (EIA).			
Does the site have a recognised environmental system certification such	☐ Yes ☑ No			
as ISO 14000 or equivalent?	Please give details:			
	Facility has no such type of certifications.			
Does the site have an Environmental policy?	☑ Yes □ No			
If yes, is it publicly available?	☑ Yes □ No			
If yes, does it address the key impacts from their operations and their	☑ Yes □ No			
commitment to improvement?	Please give details:			
	The site addresses the key impacts from their operations and their commitment to improvement.			
Does the site have a Biodiversity policy?	☑ Yes □ No			
Is there any other sustainability systems present such as Chain of Custody, Forest	☐ Yes ☑ No			
Stewardship Council (FSC), Marine	Please give details:			
Stewardship Council (MSC) etc.?	Not Applicable.			
Have all legally required permits been shown?	☑ Yes □ No			
SHOWIT:	Please give details:			
	Facility has all legally required permits.			
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☑ Yes □ No □ Not Applicable			
	Please give details:			
	Facility had proper documentation keeping system to record hazardous chemicals used in the manufacturing process.			
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☑ Yes □ No			
	Please give details:			
	The facility has system for managing client's requirements and legislation regarding environmental issues.			
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☑ Yes □ No			
	Please give details:			
	Facility has reduction targets for environmental aspects like water consumption, energy, and greenhouse gas emissions.			

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Facility has evidence of waste recycling and is monitoring volume of waste that is	☑ Yes □ No				
recycled.	Please give details:				
	Facility recycles wastes through third party organization, and they have a monitoring system to determine the volume which has been recycled.				
Does the facility have a system in place	☑ Yes □ No				
for accurately measuring and monitoring consumption of key utilities of water,	Please give details:				
consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	Facility has a measuring system to monitor the energy consumption.				
Has the facility checked that any Sub-	☑ Yes □ No				
Contracting agencies or business partners operating on the premises have	Please give details:				
the appropriate permits and licences and are conducting business in line with	Facility has a policy for sub-con	tracting agencies or business			
environmental expectations of the facility?	partner selection.	9.9.			
Usage/Discharge analysis					
Criteria	Previous year: 2022	Current year: 2023			
Electricity Usage: Kw/hrs	449015	176474			
Renewable Energy Usage: Kw/hrs	50040	120188			
Gas Energy Usage: Kw/hrs	8962349	7158201			
Has site completed any carbon Footprint Analysis?	No	No			
If Yes, please state result					
Water Sources	Ground Water (Deep tube well).	Ground Water (Deep tube well).			
Water Volume Used	768510	740982			
Water Discharged	Nearest Canal	Nearest Canal			
Water Volume Discharged	538912	567116			
Water Volume Recycled	0	0			
Total waste produced	894788.35 KG	568274.1 KG			
Total hazardous waste produced	896 KG	800 KG			
Waste to recycling	18741 KG	10720 KG			
Waste to landfill	0	0			
Waste to other	876047.35 KG	557554.1 KG			
Total Product Produced	7526461 KG	6881046 KG			

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

10C: Compliance Requirements

10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all

fiscal legislative requirements.

10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of

fraudulent Business Practice,

10.C.6 Businesses should have a designated person responsible for implementing standards concerning **Business Ethics** 

10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area

10C: Guidance for Observations

10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

### **Current Systems and Evidence Examined**

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

## **Current Systems:**

- The integrity policy of Intertek was given to the facility prior to start the audit. The management acknowledged this, signed it and kept a photocopy.
  The company manual contains the details of Business Ethics; moreover, they have anti-bribery and anti-
- corruption policy. The Business integrity policy was established and communicated to all employees by company manual, employee handbook and orientation and regular training.
- · Based on facility's management interview, the facility was familiar on local regulations/laws concerning
- business integrity standards.
   Mr. Md. Mahfuzur Rahman General Manager (HR, Admin & Compliance) is the responsible person for business integrity.
- · The employees have their orientation training on business ethics when they first start their job. The Admin and Compliance department determines all job roles and responsibility categorized by section.

#### **Evidence examined:**

- The company business ethics policy including bribery, corruption.
- Training records.

# Any other comments:

None.

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complete their own business ethics training.

Does the facility have a Business Ethics **Internal Policy ~** Policy and is the policy communicated and applied internally, externally or both, Policy for third parties including suppliers as appropriate? Please give details: Facility has business ethics policy and the policy communicated internally & externally. Does the site give training to relevant ☑ Yes □ No personnel (e.g. sales and logistics) on business ethics issues? Please give details: The site gives training to relevant personnel (e.g. sales and logistics) on business ethics issues. Is the policy updated on a regular (as ☑ Yes □ No needed) basis? Please give details: The policy gets updated on a regular basis. Does the site require third parties ☐ Yes ☑ No including suppliers to complete their own business ethics training Please give details: The site does not require third parties including suppliers to

# **Attachments**



Facility name plate.JPG



Facility building.JPG



Security check post.JPG



Facility main gate.JPG



Sewing Section.JPG



**Knitting Section.JPG** 

Start Date: 2023-10-23 2023-10-23

End Date:





**Dyeing Section.JPG** 



Finishing Section.JPG



Packing section..JPG



**Cutting Section.JPG** 



**Dyeing Finishing section.JPG** 



Chemical Store.JPG

Start Date: End Date: 2023-10-23

2023-10-23





Finished Goods store.JPG



Fabric store.JPG



Toilet.JPG



Smoke detector.JPG



Notice Board.JPG



Stairway.JPG

Start Date: End Date: 2023-10-23 2023-10-23

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Roof Top.JPG



Spot removing room.JPG



**Grievance box.JPG** 



No smoking sign.JPG



Medical room.JPG



First aider.JPG

Start Date: 2023-10-23

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Eye wash station.JPG



First aid box.JPG



**Dining Room.JPG** 



Canteen.JPG



**Drinking water point.JPG** 



Childcare room.JPG





Rescuer.jpeg



Fog Light.JPG



PA System.JPG



Fire panel room.JPG



Fire exit door.JPG



Posted evacuation plan.JPG

Start Date: 2023-10-23

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Hose pipe cabinet.JPG



Fire alarm sounder.JPG



Fire alarm switch.JPG



Exit Sign.JPG



Fire fighting equipment.JPG



Fire Fighter.JPG

Start Date: End Date: 2023-10-23 2023-10-23

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Emergency light.JPG



Exhaust Fan.JPG



**Electrical distribution board.JPG** 



Fire Extinguisher.JPG



Fire pump room.JPG



**Boiler.JPG** 

Start Date: 2023-10-23

End Date: 2023-10-23







Sub-station.JPG



**Generator.JPG** 



Compressor.JPG



Transformer.JPG



ETP.JPG



Fire hose pipe demonstration.JPG

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End Date: 2023-10-23





NC Photo\_Aisle found partially blocked.jpeg



NC Photo\_Eye guard found displaced.jpeg



NC Photo\_Sewing operator not wearing face mask.jpeg



NC Photo\_Spot removing workers not wearing PPE.jpeg



Signed CAPR.pdf

Start Date: End Date: 2023-10-23 2023-10-23





For more information visit: <u>Sedexglobal.com</u>

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

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