



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC417581901	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS417582801	
Business name (Company name):	A V Thomas Leather Allied Products Private Limited			
Site name:	A V Thomas Leather & Allied Products Pvt Ltd			
Site address:	No. 50, Annasalai, Muthupalaniappa Nagar, Nagalkeni, Chrompet, Chennai 600044 N/A Chennai 600044 IN	Country:	IN	
Site contact and job title:	Mr. Mohammed Rafi / Factory manager			
Site phone:	04422449210	Site e-mail:	sridhar@avtleather.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-02-26			

Audit Company Name:
SIPAS CR-PERU

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

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Veeramaheshwaran CD	APSCA Number:	21703486
Additional Auditors:	Dhanush Balaji		32201013
Date of declaration:	2024-02-27		

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

Site Representation	
Full Name:	Mr. Mohammed Rafi
Title:	Factory manager
Date of declaration:	2024-02-27
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	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1	§1 §2	2	0	0	NC - ZAF600368034 NC - ZAF600368035
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	1	GE - ZAF600368036
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Factories Act 1948, Chapter I, Section 7 (A) (1), every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at the work in the factory.
§2	In accordance with Tamil Nadu Factories Rules 1950, PART II Rules 95, (9)Handling and storage of chemicals-(5)Standby arrangements equal to the biggest container shall always be available to transfer the toxic substances quickly into the standby storage facility if any defect develops in any of the containers resulting in the release of toxic substances.

Site Details

Site Details					
Company Name	A V Thomas Leather Allied Products Private Limited				
Site Name	A V Thomas Leather & Allied Products Pvt Ltd				
GPS location (if available)	GPS Address:	12.9639163 Longitude			
	Coordinates:	80.1356843 Latitude			
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory Licence Number: KPM07548 for 500 employees valid till 31st December 2024, Fire License Number : 9997/2023 issued on 05th October 2023 and valid for 01 year from the date of issue.				
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacture of Leather Shoes, and the production process as below. Leather Receipt – Cutting – Skiving – Attaching – Stitching –Lasting - Sole Attaching - Checking - Packing – Dispatch.				
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Facility was established in the year 2007 at the current location. The facility was manufacturing of Leather products – Shoes. Facility is located on 01 main building with two floors and the total land area of 21124 square feet.				
Structure and number of buildings	Building Name:		Main Building -1		
	Floor	Description	Remark		
	Ground Floor	Office area, Creche, Manager Cabin, Full Shoe section, Cutting section, Packing Section, Finished goods Storage area, Chemical Store, Toilet area, Electrical Control panel area, Diesel Generator Area.	None		
	First Floor	Upper shoe section, Material store, Conference hall, Skiving section, Assembling section, Stitching section.	None		
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
	Please give details: No cracks and other building integrity issues found in the facility.				

Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has obtained Building stability certificated from competent person dated 10th December 2021 covering entire building.
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	January to July
Process overview	Manufacture of Leather Shoes and the production process as below. Leather Receipt – Cutting – Skiving – Attaching – Stitching –Lasting - Sole Attaching - Checking - Packing – Dispatch.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Works / Grievance Redressal employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No accommodation buildings provided by facility.

Audit Parameters						
Time in and time out	Day 1		Day 2			
	In	10:00	In	09:50		
	Out	17:30	Out	14:00		
Audit type:	FULL_INITIAL					
Was the audit announced?	ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	Mr. Mohammed Rafi / Factory manager					
Is further information available	No					

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No Trade union in facility.		
<i>Reason for absence during the audit</i>	No Trade union in facility.		
<i>Reason for absence at the closing meeting</i>	No Trade union in facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	0	0	21	0	0	0	0	21
Worker numbers - female	0	0	95	0	0	0	0	95
Total	0	0	116	0	0	0	0	116
Number of Workers interviewed - male	0	0	8	0	0	0	0	8
Number of Workers interviewed - female	0	0	18	0	0	0	0	18
Total - interviewed sample size	0	0	26	0	0	0	0	26

Nationalities Structure			
Nationality of Management	Indian		
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Indian approx %: 100%		
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
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:	None	

Worker Interview Summary		
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Number of group interviews:	3 group of 5 Female employees and 1 Group of 5 male employees.	
Number of individual interviews:	Male: 3	Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:	
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable	<input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	None	
What did the workers like the most about working at this site?	On time salary , Regular work and Friendly Staffs'.	
Any additional comment(s) regarding interviews:	None	
Attitude of workers to hours worked:	Satisfactory Level	
Is there any worker survey information available?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

26 employees were selected for interviews. They were found to be happy with the management behavior's.

Attitude of worker's committee/union reps:

Out of selected 26 workers, 04 employees were from various committees. They were also found to be happy with the management behavior's and said that there is regular practice of conducting committee meetings and they also participate effectively.

Attitude of managers:

The factory management showed a positive attitude to this audit during the whole process. All documentation requested for review was provided timely. At the end of the audit discussed scope for improvement were accepted by the facility. The facility management showed strong commitment for continual improvement. After factory tour it was noted that the management is very committed towards implementation of health and safety requirements as well as in the documentations requirements.

**OA - 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 Human rights

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based on review of records facility had established a policy covering human rights impacts and issues.
2. Based on audit process facility has designated Mr. Mohammed Rafi - Factory Manager as responsible for implementing standards concerning Human rights.
3. Facility has established any transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.
4. Facility identify their stakeholders and communicated their policies including Human Rights Policies.

Evidence examined:

1. Display Human Rights Policy.
2. Grievance Redressal Procedure.
3. Complaint Procedure

Any other comments:

None

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has established policy that expresses commitment to respect human rights.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has included policies in workers manual.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Mohammed Rafi - Factory Manager

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has established transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has established and implemented the data privacy procedures for workers' information.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 10.0% This year 8.0%
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])	5.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 10.0% This year 5.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month))	5.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has maintained accident records till date and no accident happened.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers])	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

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

0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees.

0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current Systems:

1. Based from facility tour and review of records, facility has implemented the ETI base code.
2. Mr. Mohammed Rafi - Factory Manager is responsible for compliance with the code.
3. Based from review of records and interaction with management facility has communicated the ETI base code to their suppliers and obtained a commitment from them to comply with this code requirement.
4. Based on review of records that facility had obtained legally required Business license from the concerned authority.

Evidence examined:

1. Facility Policy and Procedures on Social aspects, Health & safety, Environment, Management system and Facilities Code of Conduct reviewed.
2. ETI base code and ETI base code training records given to the employees.
3. Interaction with Management and Interview with employees.
4. Employees legal rights were communicated to workers and records for the same was reviewed.
5. Facility has communicated their policy & procedures and ETI Base code to their supply chains, and record for the same reviewed.
6. Facilities Legal permits such as Factory License, Building Plan Approvals, Fire License, and Pollution Control Board consents were reviewed.

Any other comments:

None

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such fine imposed on the site till date.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has established the policies and procedure with respect to social compliance.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has effectively implemented the social compliance system and ensuring the same by conducting an audit in a periodic manner, necessary corrective and preventive action has been taken by the facility for the non-compliance raised during the audit. Further the report of the same was maintained by the facility.

Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the employees had undergone an induction training where the social compliance policies and procedures were explained.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on interaction with the employees, ETI base code training given to them on 21st August 2023 and the same found effective.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such certifications were obtained by the facility.
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility has dedicated HR department to take care of HR activities.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Mohammed Rafi - Factory Manager
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has established Data Privacy policy to ensure all worker, supplier and customer information is confidential.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has a system to ensure the same whether the information was shared on a need to know basis only.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has conducted risk assessments to evaluate policy and procedure found effectively.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has process to address issues found when conducting risk assessments.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has established policy on labour standards of its own suppliers.
Land Rights	

Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has obtained "Business License" and approved building plan from the concerned authority which is found valid.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has written policy and procedures specific to land rights.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility is located in Rented Building and rental agreement maintained.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has converted non-agriculture land to the facility which does not adhere any adverse effect.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable

**1 - Freely chosen Employment
[Summary of Findings]****1: Compliance Requirements**

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current Systems:

1. Based from employee's interview, the facility does not require any deposit or deposit of employee's identification such as education certificates, passport etc.
2. Based from employee's interview, the facility does not limit the employee's freedom in any way.
3. Based from the facility tour and interview with employees, there are no evidences of involuntary labour.
4. Based from employee's interview, all are free to leave their employment by giving reasonable notice.

Evidence examined:

1. Facility Policy and Procedures.
2. Personal Files with Appointment Letter (Employment contracts) of 26 out of 26 selected samples and Payroll records of employees including Housekeeping and Security Guards were reviewed.
3. Security Guards Checklist.
4. Interaction with Management and Interview with employees.
5. Agreement / Contract made between factory and Agencies covering prohibition of Forced labour clause were reviewed.
6. Disciplinary records and termination records were reviewed, however no Disciplinary actions and termination cases during last 12 months.

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Employees are free to leave their job by giving one month notice period.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?'	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: Not applicable

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Employees are free to leave their workplace without any restriction at the end of the work day.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Facility has done a basic supplier evaluation also to ensure there is no risks of forced, trafficked, or bonded labour in its supply chain.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Not applicable as Facility does not involve on any forced / trafficked labour.

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based from employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.
2. Facility has formed a Works / Grievance Redressal Committee and conducted meetings once in every month and the minutes of meetings are recorded for verification and future reference.
3. Based from employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities.
4. Based from the employee's interview and interaction with facility management, Works / Grievance Redressal employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.

Evidence examined:

1. Facility Policy and Procedures on Freedom of Association and Collective Bargaining Agreement were reviewed.
2. Suggestion Box Monitoring records were verified.
3. Works Committee, Grievance Redressal committee, Internal Compliance committee and Health & safety Committee meeting minutes records were reviewed.
4. Interaction with Management and Interview with employees.

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Facility has formed a Works Committee and Grievance Redressal committee and conducted meetings once in every months and the minutes of meetings are recorded for verification and future reference.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem. Further facility has also established Health & Safety Committee and Internal Compliance Committee, further records for the same reviewed.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based from the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.
Name of union and union representative, if applicable:	No union exists in the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Works / Grievance Redressal committee exists in facility and meets once in every months, last meeting done on 05th February 2024.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted from Employees interview process that workers were aware about their representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-01-20
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	4.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Works / Grievance Redressal committee exists in facility and meets once in every months, last works committee conducted on 05th February 2024. Topics discussed during the committee meeting was regarding work place Grievances, employees basic need and general awareness etc.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Facility has appointed "Mrs. Rajeshwari - HR Manager" as responsible to ensure a health & Safety work environment.
2. Workplace environment appeared to be clean and safe.
3. Factory has properly trained employees by the organization. (Through workers interview)
4. Factory has provided 04 first aid boxes and 3 employees trained on First aid activities through St. John Ambulance.
5. Factory has provided clean/purified drinking water points at 03 place for their employees free of cost.
6. Factory has provided for 05 toilets for 21 Males and 11 toilets for 95 female employees.
7. Factory has provided 40 fire extinguishers throughout the facility. Factory has also provided 08 Fire Alarm points in the facility with a siren.
8. Personal protective equipment's were provided to all the concern employees free of cost and proper training of Personal Protective Equipments are given to all concerned employees. (Through Workers interview and Management interview).
9. Factory has conducted fire fighting and Fire Evacuation Drill once in every two months. The last fire evacuation drill conducted in the factory was on 22nd January 2024.

Evidence examined:

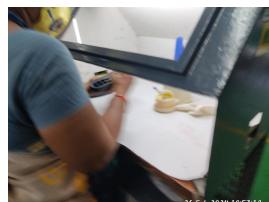
1. Factory License: KPM07548
2. Approved building plan number: 4406/2021 dated 09th December 2021.
3. H&S committee: Last held on 11th December 2023.
4. List of first aid box and First Aiders: First Aid Box -04; First Aid trainers- 03.
5. Fire extinguishers, Fire Fighters, Fire Alarm: Fire Extinguishers- 40; Fire Fighters- 21; Fire Alarm points - 08.
6. Fire mock drill record: Last held on 22nd January 2024
7. Drinking water portability test certificate: Dt: 27th November 2023.
8. Health & safety policies.
9. Risk Assessment Report
10. Training records and certificates
11. Fire Training records
12. Fire Mock drill records
13. First Aid Training Records
14. Interviews with workers and H&S committee members.
15. Training records of Personal Protective Equipment usage & importance, electrical safety, machinery, building safety and chemicals safety were reviewed.

Any other comments:

None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has included the social compliance policies in worker's manual.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has maintained the approved plant layout as per the current setup of the building from inspector of factories.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility visitors are informed on H&S and provided with appropriate personal protective equipment.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not required by Law. However sufficient first aid boxes are provided.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No Doctor or Nurse in facility and it is legally not required for the current facilities employees strength. However employees have easy access to First Aid trained employees.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has provide free transportation for the employees. Further the same found safe, fit for purpose and found used only by trained and authorized persons. And facility has covered Transport in Risk Assessment conducted.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No accommodation or living space provided by the facility for any of the employees by facility.

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have conducted risk assessment and the appropriate corrective and preventive action has been by the facility for the identified risks.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: It was noted from record review that, Facility has obtained Consent of Air, Water & Hazardous waste from TamilNadu State Pollution Control Board.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on interaction with facility management that the facility does not use any banned chemicals and meet all the environmental standards based on customer requirement.

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600368034	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Factories Act 1948, Chapter I, Section 7 (A) (1), every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they at the work in the factory.	 NC - Glue handler without Hand Gloves.jpg
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.	 NC - Glue handler without Hand Gloves 2.jpg
Explanation to the non compliance	It was noted from the facility tour that, 02 Pasting worker working in Assembling section not found using hand gloves, as the training provided to them on Personal Protective Equipment's not found effective, further this may lead to skin injury to the worker.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that that facility shall ensure, provided Personal Protective Equipment's are effectively used by workers while at work.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600368035	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)	
Subcategory	Chemicals	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of Monitoring	
Local law issue	In accordance with Tamil Nadu Factories Rules 1950, PART II Rules 95, (9)Handling and storage of chemicals-(5)Standby arrangements equal to the biggest container shall always be available to transfer the toxic substances quickly into the standby storage facility if any defect develops in any of the containers resulting in the release of toxic substances.	 NC - Chemical Stored without secondary Containment.jpg
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 from the facility tour that, 04 Chemical (Inks) Cans in main Chemicals storage area located at Ground floor of the building stored directly on floor without secondary containers, which may lead to chemical leakage on floor and soil contamination.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility shall store chemicals on sufficient secondary containers to avoid chemicals leakage on floor.	



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

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

Current Systems and Evidence Examined

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

Current Systems:

- 1. Based from interaction with staffs, all employees are hired by the Human Resource Department only.
- 2. Based from review of hiring policy documents, employee's ID for age proof such as Aadhar card, Voter ID, Driving License and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.
- 3. Based from the policy review, the minimum hiring age of the facility is 18 years old.
- 4. Based from employees' interview, any suspect of child labour can be reported to facility management.
- 5. Based on the employee interviews, review of facility's Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor. Youngest employee found within the samples is 20 years old.

Evidence examined:

- 1. Child Labour and Child Labour Remediation Policy.
- 2. Age Proof records of 26 out of 26 selected samples.
- 3. Interaction with Management and Interview with employees.
- 4. Employment contract/ Appointment Letters were reviewed for 26 out of 26 selected samples.

Any other comments:

None

Legal age of employment:	14
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 1.Based from review of records and from other audit process that facility maintained complete and accurate IN/Out time records to all employees.
- 2.Facility has paid applicable minimum wages to all employees and as per company policy all overtime hours shall be compensated at 200% of normal rate of wages.
- 3.Based from employee's interview, wages are fixed, calculated and paid on monthly basis on every next month of 7th day.
- 4.Based from employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
- 5.Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.

Evidence examined:

1. Pay slips and Attendance records for all 26 selected samples months of January 2024(Current month), October 2023(Non-peak month) and July 2023(Peak month).
2. Time records and Wage paid records.
3. Interaction with management and Employees.

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 398.57 Per Week: null Per Month: 10363	Actual Per Day: 404.8 Per Week: 2631.25 Per Month: 10525	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: 200 Per Week: 200 Per Month: 200	Actual Per Day: 200 Per Week: 200 Per Month: 200	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	A total of 26 employees were interviewed and the same numbers of records were reviewed for the months of January 2024 (Current month), October 2023 (Non-peak Month) and July 2023 (Peak Month).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility has following TamilNadu leather Footwear Industry legal minimum wages form 01st April 2023 to 31st march 2024, Unskilled: INR 10363 per month, Semi-Skilled: INR 10716 per month. Skilled: 11070 per month.		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	10525		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Facility has paid 8.33% Bonus to all employees, which is complying with legal requirements. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	1.Employee provident Fund @ 12% from earned Basic & DA wages 2.Employee State Insurance @ 0.75% from earned gross wages		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	1.Employee provident Fund @ 12% from earned Basic & DA wages 2.Employee State Insurance @ 0.75% from earned gross wages		
Please list all deductions that have not been made.	None		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has implemented Finger print and Face reading time recording system for In/out time recording.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Tamil Nadu State Government will revise the minimum wages for a month in every year and the same will be paid to the employees accordingly.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on review of wage records, equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600368036	
Clause	5 - Living Wages are Paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	It was noted from the audit process that facility has provide transportation for workers at free of cost.	
Evidence	Employees Interview and Facility Tour	

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

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

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

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

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Facility has restricted normal working hours to 8 hours per day and 48 hours per week and overtime hours restricted with in legal limits.
2. Based from tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
3. The facility has implemented Facility had implemented Fingerprint and Face reading time recording system to record IN/Out time of all employees.

Evidence examined:

1. In/Out time records and Salary register for 26 selected samples for months (January 2024, October 2023 and July 2023), which includes Agency employees payroll and time records also.
2. Interaction with management and Employees.
3. Facility policy on Working hours, Overtime hours, Wages and Overtime compensation were reviewed.

Any other comments:

None

Working hours' analysis**Systems & Processes**

What timekeeping systems are used?	Facility has implemented Fingerprint and Face reading time recording system for In/out time recording.
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	No overtime has worked in sample months.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has restricted total working hours (Regular hours and Overtime hours) within 60 hours per week and same is complying with legal requirement.
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Based on interview with employees as per company policy overtime is engaged on voluntary basis if required.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: Facility has providing overtime hours compensated at 200% of the normal rate of wages. However no overtime has worked in sample month.

Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility has providing overtime hours compensated at 200% of the normal rate of wages. However no overtime has worked in sample month.		
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Consolidated pay	<input type="checkbox"/> Collective Bargaining agreements
	<input type="checkbox"/> Other		
Please give details	Facility has providing overtime hours compensated at 200% of the normal rate of wages. However no overtime has worked in sample month.		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary	<input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary	<input type="checkbox"/> Safeguards are in place to protect worker's health and safety
	<input type="checkbox"/> Site can demonstrate exceptional circumstances	<input type="checkbox"/> Other reasons (please specify)	
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

7 - No Discrimination is Practiced
[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based from review of wage records and employees' interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
2. HR Manager is responsible for the investigation and disposal of discrimination case.
3. Based from wage records review, the facility provides the same pay for male/female employees for same work of similar nature.

Evidence examined:

1. Facility Policy on Recruitment & Hiring and Discriminations were reviewed.
2. Appointment letter (Employment contract) with terms and conditions for 26 out 26 selected samples.
3. Salary and other benefit records for selected employees including Agency workers.
4. Interaction with management and Employees.
5. Disciplinary cases records were reviewed, however no cases of Disciplinary actions during last 12 months.

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 80.0% Female: 20.0%		
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	02		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found		
Please give details	Not applicable - No evidence of discrimination found.		
Professional Development			
What type of training and development are available for workers?	Facility has a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based on record review and employee's interview appointment letters issued to all 26 out of 26 selected employees.
2. Based from interaction with the facility management, it was noted that all employees are employed on regular basis; and no casual and apprentice employees were engaged.
3. Based on interaction with employees, no recruitment fees is required at any stage of the recruitment process.

Evidence examined:

1. Facility Policy on Recruitment & Hiring were reviewed.
2. Recruitment records / Job Applications Forms were reviewed.
3. Employment Contracts / Appointment letter with terms and conditions for 26 out 26 selected samples.
4. Salary and other benefit records.
5. Interaction with management and Employees.

Any other comments:

None

Responsible Recruitment**All Workers**

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

- Terms & Conditions presented
 Same as actual conditions

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

Migrant Workers	
Type of work undertaken by migrant workers:	No Migrant workers engaged by facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 100 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable
Is there any observation on this finding?	None
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	4
Please provide the names of agencies if applicable	1. Sri V. Manivannan Enterprises 2. Sree Venkataraman Enterprises 3. BBR Manpower Services 4. SERVE Security Services.
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has signed agreement with 04 out of 04 agencies engaged and the details are as below. 1. Serve Security Services (For Security operations) - Agreement dated 01st April 2023 and the same found valid for 01year from the date of Agreement. 2. Sri. V. Manivannan Enterprises (Production process) - Agreement dated 01st January 2024 and the same found valid for 01year from the date of Agreement. 3. Sree Venkataraman Enterprises (Production process) - Agreement dated 01st January 2024 and the same found valid for 01year from the date of Agreement. 4. BBR Manpower Services (Production process) - Agreement dated 01st January 2024 and the same found valid for 01year from the date of Agreement.

Does the site have a system for checking labour standards of agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Agreement has made between agency and facility for the period of one year and the same found valid.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contractors are engaged by facility.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contractors are engaged by facility.

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based from the interaction with the facility management and employees' interview, it is noted that the facility is not using Sub-contractor.
2. Facility is not using any Home workers

Evidence examined:

1. Facility Policy on Sub-contracting were reviewed.
2. Inward and out ward material register.
3. Production records.
4. Interaction with management.

Any other comments:

None

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

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]**9: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

Based from the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.

Evidence examined:

1. Facility Policy on Harassment& Abuse and Disciplinary policies were reviewed.
2. Internal Compliance Committee meeting minutes were reviewed. Last meeting was held on 07th December 2023.
3. Interaction with management and Employees.
4. Employees training records on facilities policies and procedures were reviewed. Last such training was held on 21st August 2023.
5. Disciplinary actions records were reviewed, however no such actions in last 12 months.
6. Suggestion box opening and checking records were reviewed.

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has formed Anti sexual harassment committee and the grievance will directly report to them if any.
If yes, are workers aware of these channels and have access? Please give details.	Facility Anti sexual harassment committee representative will communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Direct communication during meeting.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Facility has effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Committee meetings and Direct interaction with management.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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:

1. Based from the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.
2. Based from the review of employee personal files, all the employees are holding the legal rights to work.

Evidence examined:

- Interaction with Management and Employees.
1. Facility policy on Migrant employees, Workers rights and Discrimination were reviewed.
 2. Employees National Identity Cards (Aadhar card) were reviewed.
 3. Interaction with Management and Employees.

Any other comments:

None

**10B4 - Environment 4-Pillar
[Summary of Findings]****10B4: Compliance Requirements**

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

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

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

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

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

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

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

10B4: Guidance for Observations

10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. The facility has established and maintained environmental policy & HR Manager is responsible for environmental aspects.
2. Based on management interaction, facility and their suppliers are aware the environmental requirements.
3. Facility has obtained State Pollution Control Board Consent of Air, Water and Hazardous waste from State Pollution Control Board.

Evidence examined:

1. Facility Environment Policy was reviewed.
2. Facility has obtained State Pollution Board consent of air and water from authority and the same found valid till 31st March 2024.
3. Air Ambient, Illumination, Noise and Indoor air quality test conducted on 27th November 2023.
4. Facilities Approved Chemicals list and MSDS for the same reviewed.
5. Facilities Energy & Water consumption records were reviewed.
6. Facility has trained relevant employees on facility's Environment policy and legal environmental aspects, and records verified for the same.
7. Facilities Waste disposal agreements made with authorized agencies and waste disposal records were reviewed.
8. Interaction with management and Employees.

Any other comments:

None

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Mr. V. Sathish Kumar - Senior HR Executive
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has conducted the Risk Assessment & Same Training & Awareness on 07th October 2023 and same given for All Staff & Employees.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has not obtain any such certificate.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility address the key impacts from their operations and their commitment to improvement.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has not established any such system.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Water Consent Proceeding Nf:F.1418MMN/GM/DEE/TNPCB/MMN/W/2023 Issue Date: 14/03/2023 Valid Till: 31/03/2024 Air Consent Proceeding Nf:F.1418MMN/GM/DEE/TNPCB/MMN/A/2023 Issue Date: 14/03/2023 Valid Till: 31/03/2024
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Facility has MSDS for chemicals and Chemical Inventory details Consumption of Chemical on Daily Basis.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility following clients requirement as mentioned in Restricted Substance List.

Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has the goals for natural resources with multiple parameter to reduce the consumptions. For Electricity-2% of unit/Garment For Water- 1%
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility is not engaged in such system.
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognized protocols or standards.
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has not engaged any subcontracting agencies.

Usage/Discharge analysis

Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hr	268870	235563
Renewable Energy Usage: Kw/hr	0	0
Gas Energy Usage: Kw/hr	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	•Ground water	•Ground water
Water Volume Used	134	118
Water Discharged	•Ground water	•Ground water
Water Volume Discharged	130	99
Water Volume Recycled	0	0
Total waste produced	Food Waste: 1025 kg Carton Waste:653 Plastic Waste: 90 Leather Waste: 365 kg	Food Waste: 936 kg Carton Waste: 504 kg Plastic Waste: 90 Leather Waste:188 kg
Total hazardous waste produced	102 Nos (Chemical Container)	144 Nos (Chemical Container)
Waste to recycling	0	0
Waste to landfill	0	0
Waste to other	653 carton 90 kg plastic	504 kg carton 90 kg plastic

Total Product Produced	214602 Pair	171242 Pair
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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:

- 1 Facility have designated person for implementing policies regarding business ethics.
2. The facility is aware of client's policy of Business Integrity.
3. The facility has received and acknowledged Integrity Policy & Procedure of the auditing company.

Evidence examined:

1. Facilities Business Ethics Policy and Anti-Bribery Policy were reviewed
2. Interaction with Management and Interview with employees.
3. Management staffs & other staffs handling suppliers and Legal authorities were trained on facilities Business Ethics Policy and Anti-Bribery Policy, further records for the same verified.
4. Interaction with Management & Employees.

Any other comments:

None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?

Internal Policy

Policy for third parties including suppliers

Please give details:

Facility have a designated person responsible for implementing standards concerning Business Ethics.

Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has trained their employees.
Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have a designated person responsible for implementing standards concerning Business Ethics.
Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such training however policy is communicated and acknowledged by suppliers.

Attachments



Emergency Light.jpg



26-Feb-2024 10:58:27 am

Fire alarm call point.jpg



26-Feb-2024 10:50:32 am

Diesel Generator area.jpg



26-Feb-2024 10:54:20 am

Suggestion Box.jpg



26-Feb-2024 11:05:00 am

Skiving section.jpg

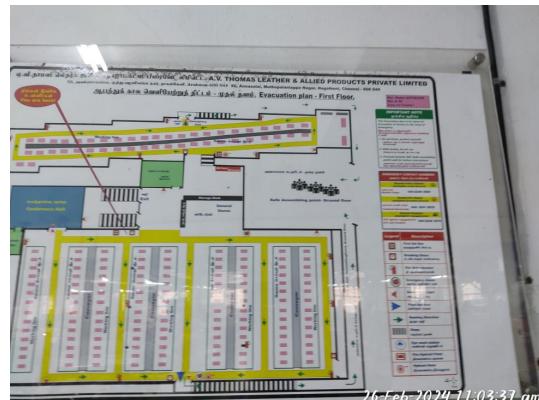


26-Feb-2024 10:50:02 am

Facility Building Overview.jpg

Fire alarm Control Panel.jpgUsed Oil Storage area.jpgFire Hose reel.jpgPPE Box.jpgAttaching Section.jpgETI Base Code Displayed.jpg

Facility Notice Board.jpgFacility Name Board.jpgAssembling and Stitching section.jpgFire Buckets.jpgEye wash station.jpgDrinking water point.jpg

Creche.jpgEmergency Evacuation Plan.jpgFirst aid box.jpgFinsihing Section.jpgPacking section.jpgSecurity Hold area.jpg

Fire Hydrant point.jpgFire Extinguisher.jpgSprinkler.jpgAbstract of act Displayed.jpgChemical spill kit provided in Chemical Storage.jpgGender Wise marked toilet.jpg



26-Feb-2024 10:50:06 am

Facility Entrance.jpg

26-Feb-2024 10:59:46 am

Cutting section.jpg

26-Feb-2024 10:51:31 am

Time recording system.jpg

26-Feb-2024 10:58:05 am

Finished Goods storage area.jpg



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

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

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

Click here for Auditors:

<https://www.surveymonkey.co.uk/r/BRTVCKP>