

# Sedex Members Ethical Trade Audit Report

## Version 6.1

	Audit Details								
Sedex Company Reference: (only available on Sedex System)	ZC: 1003630 Sedex Site (only availal System)				ZS: 10	52498			
Business name (Company name):	M.K. Sons (Pvt.) Limited								
Site name:	M.K. Sons (Pvt.) Limited								
Site address: (Please include full address)	2 Km Jaranwala Road, Country Khurrianwala, Faisalabad		Country:		Pakist	an			
Site contact and job title:	Mr. Asim Ali Shah – (	Group	General Mar	nager HR and	d Comp	oliances			
Site phone:	+92412428551-4		Site e-mail:		gm.hr@mksons.com				
SMETA Audit Pillars:	Labour Standards	Health & Safety (plus Environment 2- Pillar)		Environr 4-pillar	nent	Business Ethics			
Date of Audit:	01 ~ 3 July 2021								

 Audit Company Name & Logo:
 Report Owner (payer):

 TUV Rheinland Arabia LLC (Pakistan Branch)
 Report Owner (payer):

 M.K. Sons (Pvt.) Limited
 M.K. Sons (Pvt.) Limited

	Audit Conducted By									
Affiliate Audit Company		Purchaser		Retailer						
Brand owner		NGO		Trade Union						
Multi- stakeholder			Combined Audit (select all that apply)							

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact <u>grievance@sedex.com</u>.

To confirm the validity of this report, please visit <u>https://www.sedex.com/audit-verifier/</u>

#### 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 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.

Any exceptions to this must be recorded here (e.g. different sample size):

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Muhammad Salman Lead auditor APSCA status: Team auditor: Rashid Mansoor Interviewers: Muhammad Salman Rashid Mansoor

Report writer: Muhammad Salman Report reviewer: Mr. Anthony Raj A APSCA number: RA 21700542 Registered Auditor APSCA number: ASCA 21701621 APSCA number: RA 21700542 APSCA number: ASCA 21701621

#### Date of declaration: 03-July-2021

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.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

### **Summary of Findings**

<b>Issue</b> (please click on the issue title to go direct to the appropriate audit results by clause) <b>Note to auditor, please ensure that when issuing</b>	(Only conformit	check box y, and only	<b>n–Conformity</b> when there is a in the box/es w ty can be four	a non– where the		d the nu ues by l		Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
the audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	

0A	Universal Rights covering UNGP				0	0	None observed
OB	<u>Management systems and</u> <u>code implementation</u>			0	0	01	<ul> <li>Good Example:</li> <li>Facility has provided notice boards near main gate and at various places throughout the facility. Legal laws, Facility's code of conduct, Customers code of conduct, ETI Base code and other information's are displayed for employee's awareness.</li> </ul>
1.	Freely chosen Employment			0	0	0	None observed
2	Freedom of Association	$\boxtimes$		01	0	0	<ul><li>Non-Conformance:</li><li>Few workers were not aware about the role of joint worker welfare council.</li></ul>
3	Safety and Hygienic Conditions			05	0	01	<ul> <li>Non-Conformance:</li> <li>Monthly inspection of 02 fire extinguish found not conducted in fabric inspection department.</li> <li>Un-identified chemical bottles (using for stain removing) found available in fabric</li> </ul>

							<ul> <li>inspection and safety data sheet not available.</li> <li>PPEs partially using in different area</li> <li>No soap and tissues provided in washrooms, and toilets were found untidy condition.</li> <li>Poor housekeeping and cigarette buds were found in dining hall and un-hygienic handling of canteen food items observed, moreover fly catcher found not functional in canteen area.</li> <li>Good Example:</li> <li>Provided in-house vaccination camp for COVID 19 vaccine for employees. Most of the employees are vaccinated for COVID 19.</li> </ul>
4	Child Labour			0	0	0	None observed
5	Living Wages and Benefits			0	0	02	<ul> <li>Good Example:</li> <li>Subsidized food given to all employees and one in every month facility provides free of cost meals to all employees.</li> <li>Free of cost transport to employees.</li> </ul>
6	Working Hours			0	0	0	None observed
7	Discrimination			0	0	0	None observed
8	Regular Employment			0	0	0	None observed
8A	Sub-Contracting and Homeworking			0	0	0	None observed

9	Harsh or Inhumane Treatment					0	0	0	None observed
10A	Entitlement to Work					0	0	0	None observed
10B2	Environment 2-Pillar					0	0	0	None observed
10B4	Environment 4-Pillar					0	0	0	None observed
10C	Business Ethics					0	0	0	None observed
Gene	ral observations and summary of t	he site:							
•	<ul> <li>The audit was conducted in 4.5 days. On all three days 2 auditors participated in the audit.</li> <li>Facility MK Sons (Pvt) Ltd is situated at 2 km Jaranwala Road, Khurrianwala, Faisalabad. Facility has land area of 103196.999 Square meter and covered area of 41920.1 Sq. meter.</li> </ul>								

- Facility manufactures home textile products. Facility has in-house weaving, dyeing, printing, cutting, stitching, checking, pressing, and packing operations.
- Facility has total 1850 workers out of which 42 are females and rest are male.
- Facility works in three shifts shift A works from 6:00 am to 2:00 pm. Shift B from 2:00pm to 10:00 pm and shift C from 10:00 pm to 6:00 am. While office staff and stitching departments works in single shift from 9:00 am to 6:00 pm. Facility use biometric system for recording attendance.
- Facility comprises of 7 blocks of buildings. Block 1 is ground floor having admin offices. Block 2 is ground plus 1 story having head office building. Block 3 is basement, ground plus 3<sup>rd</sup> floors. Basement and ground floor have cutting. Ground floor also has stitching department, embroidery, fabric store and quilting department. First floor has stitching department and quilting department. Second floor has stitching department and finished goods warehouse. Third floor has workers canteen. Block 4 is ground plus 1 floor. Ground floor has wet processing area. First floor has digital printing department, laboratory, and canteen. Block 5 is ground floor having utilities area. Block 6 is basement and ground floor. Basement has accessories storage area and chemical storage area. Ground floor has waste storage area. Block 7 is ground floor having weaving department. Block 8 is ground floor has stitching department. Block 8 is ground floor has stitching department. Block 8 is ground floor has waste storage area. Block 7 is ground floor having weaving department. Block 8 is ground floor has stitching department. Block 8 is ground floor has waste storage area. Block 7 is ground floor having weaving department. Block 8 is ground plus 1<sup>st</sup> floor. Ground floor has greige storage area. First floor has stitching department and finished goods warehouse.
- Facility pay minimum wage 17500 Rs in compliance with the local law requirements. Wages paid before 10th of next month. All facility employees directly hired by the facility. Wages paid on monthly bases. Facility does not have any piece rate and daily wage employees.
- Facility does not have any peak season or lean season production remains same throughout the year.
- Facility has production capacity to process 45000 meters of fabric per month for manufacturing of home textile products.
- Facility has not provided any dormitory facility.
- 52 employees were sampled for interview and documents review. Interviews were conducted for both male and female employees. Wages and working hours records were checked for the months of May 2021 (Current month), March 2021 (Random Month), December 2020 (Random Month)

- Facility does not have any workers union although facility has Joint Workers welfare council. Representative of joint workers welfare council was available during audit process.
- There were several non-compliances observed during audit process that are listed in the body of report.

\*Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.

### **Site Details**

	Site Details						
A: Company Name:	MK Sons (Pvt) Ltd.						
B: Site name:	MK Sons (Pvt) Ltd.						
C: GPS location: (If available)	GPS Address: JaranwalaLatitude: 73.28333Road, Khuryanwala,Longitude: 31.41833Faisalabad.Longitude: 31.41833						
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Facility has certificate from Directorate of Labour Welfare JDLW/FD/F/610. Certificate of incorporation Number L.474 Of 1984-85 NTN (National Tax Registration No. 1747362-4						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Facility manufactures home textile products. Facility has in- house weaving, dyeing, printing, cutting, stitching, checking, pressing, and packing operations.						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)		abad. Facilit	ty has lan	m Jaranwala Road, d area of 103196.999 D.1 Sq. meter.			
	Production Building no 1	Descriptio	on	Remark, if any			
	Ground	Administra offices	ation	Nil			
	ls this a shared building?	No		Nil			
	Duilding?         Description         Remark, if any           Building no 2         Production         Production         Production						
	Ground floor Head office Nil						
	Floor 1 Is this a shared	Head offi	се	Nil			
	building?	No		Nil			

Production	Description	Remark, if any
Building no 3		Ĵ
Basement	Cutting	Nil
Ground	Cutting, stitching department, embroidery, fabric store and quilting department	Nil
Floor 1	Stitching department and quilting department	Nil
Floor 2	Stitching department and finished goods warehouse	Nil
Floor 3	Workers canteen	Nil
Is this a shared building?	No	Nil
Production Building no 4	Description	Remark, if any
Ground floor	Wet processing	Nil
Floor 2	Digital printing department, laboratory, and canteen	Nil
Is this a shared building?	No	Nil
Production Building no 5	Description	Remark, if any
Ground floor	Utilities area	Nil
Is this a shared building?	No	Nil
Production Building no 6	Description	Remark, if any
Basement	Accessories storage area and chemical storage area	Nil
Ground	Fabric storage area	Nil
Is this a shared building?	No	Nil
Production	Description	Remark, if any

	l						
	Ground floor	Weaving department	Nil				
	Is this a shared building?	No	Nil				
	Production Building no 8	Description	Remark, if any				
	Ground floor	Greige storage area	Nil				
	Floor 1	Stitching department and finished goods warehouse	Nil				
	Is this a shared building?	NO	Nil				
	For below, please ad	d any extra rows if a	ppropriate.				
	<ul> <li>F1: Visible structural integrity issues (large cracks) observed?         <ul> <li>Yes</li> <li>No</li> <li>F2: Please give details:</li> </ul> </li> <li>F3: Does the site have a structural engineer evaluation?         <ul> <li>Yes</li> <li>No</li> </ul> </li> </ul>						
	F4: Please give details: Facility has building stability certificate form K which performed by government approved Civil Engineer Elcon Associates. Also, steel structure stability check was performed by Structural engineer of third party Izhar Stee						
G: Site function:	Agent Agent Facility Processing Finished Product S Grower Homeworker Labour Provider Pack House Primary Producer Service Provider Subcontractor						
H: Month(s) of peak season: (if applicable)	Facility does not have any peak and lean season,						
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Facility has production capacity to process 45000 meters of fabric per month for manufacturing of home textile products. Facility manufactures home textile products. Facility has in- house weaving, dyeing, printing, cutting, stitching, checking, pressing, and packing operations. Facility has 110 looms for fabric manufacturing and have 5 stitching sections.						

J: What form of worker representation / union is there on site?	<ul> <li>□ Union (name)</li> <li>☑ Worker Committee</li> <li>□ Other (specify)</li> <li>□ None</li> </ul>
K: Is there any night production work at the site?	⊠ Yes □ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	☐ Yes ⊠ No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	☐ Yes ⊠ No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	☐ Yes ⊠ No N1: If no, please give details

Audit Parameters								
A: Time in and time out	A1: Day 1 Time in: 9:20       A3: Day 2 Time in: 9:30       A5: Day 3 Time in: 9:10         A2: Day 1 Time out: 5:00       A4: Day 2 Time out: 5:30       A6: Day 3 Time out: 1:10							
B: Number of auditor days used:	2 Auditor conducted the	audited in 2 and a half da	iys.					
C: Audit type:	☐ Full Initial							
D: Was the audit announced?	Announced Semi - announced: W Unannounced	indow detail: weeks						
E: Was the Sedex SAQ available for review?	Yes No E1: If No, why not?							
F: Any conflicting information SAQ/Pre- Audit Info to Audit findings?	☐ Yes ⊠ No If <b>Yes</b> , please capture de	tail in appropriate audit by	clause					
G: Who signed and agreed CAPR (Name and job title)	Mr. Muhammad Sarfraz –	Manager Compliance						
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ⊠ No							
I: Previous audit date:	29-30-July-2020							
J: Previous audit type:	Periodic							
K: Were any previous audits reviewed for this audit	Yes No							

Audit attendance	Management	Worker Representatives		
	Senior	Worker Committee	Union	
	management	representatives	representatives	

A: Present at the opening meeting?	🛛 Yes	🗌 No	🛛 Yes	🗌 No	Yes	🛛 No
B: Present at the audit?	🛛 Yes	🗌 No	🛛 Yes	🗌 No	Yes	🛛 No
C: Present at the closing meeting?	🛛 Yes	🗌 No	🛛 Yes	🗌 No	Yes	🛛 No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Worker repr	esentativ	e was prese	ent		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is not	any emp	loyee's unic	n.		

### 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*					Total		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	Total
Worker numbers – Male	1708	0	0	0	0	0	0	1708
Worker numbers – female	42	0	0	0	0	0	0	42
Total	1750	0	0	0	0	0	0	1750
Number of Workers interviewed – male	49	0	0	0	0	0	0	49
Number of Workers interviewed – female	3	0	0	0	00	0	0	3
Total – interviewed sample size	52	0	0	0	0	0	0	52

A: Nationality of Management	Pakistani		
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: All workers and management are Pakistani National B1: Nationality 1: Pakistani B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? Yes No If no, please describe how this may vary during peak periods: There is not any peak seasons.	
C: Please provide more information for the three most common nationalities.	C: approx. % total workforce: Nationality 1 _100% C1: approx. % total workforce: Nationality 2NA C2: approx. % total workforce: Nationality 3NA		
D: Worker remuneration (management information)	D:0% workers on piece rate D1:0% hourly paid workers D2:100% salaried workers Payment cycle: D3:0% daily paid D4:0% weekly paid D5:100% monthly paid D6:0% other D7: If other, please give details		

Worker Interview Summary				
A: Were workers aware of the audit?	☐ Yes ⊠ No			
B: Were workers aware of the code?	Yes No			
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	32 Employees (8 Group	of 4 employees each)		
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 17	D2: Female: 3		
E: 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. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	Yes No If no, please give details	5		
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	Yes No			
G: In general, what was the attitude of the workers towards their workplace?	Favourable			
H: What was the most common worker complaint?	No worker complaint wa interview.	as raised during		
I: What did the workers like the most about working at this site?	Timely payment good w	vorking environment		
J: Any additional comment(s) regarding interviews:	Nil			
K: Attitude of workers to hours worked:	Employees were happy with the working hours they worked.			
L. Is there any worker survey information available?				
☐ Yes ⊠ No L1: If yes, please give details:				
M: Attitude of workers:				

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

52 employees were randomly selected from different departments out of which 2 were female and 50 were male. Interviews were conducted in groups also individual interviews were conducted. Auditors explained the confidentiality of interviews to the workers so that they can speak freely.

All workers confirmed that they are satisfied with the facility practices. Also, they are satisfied with the wage structure and working hours of the facility. Also, employees stated that the remunerations paid by the facility is comparative in the market. All employees confirmed that overtime is voluntary, and they can leave the facility any time in any emergency. Employees also confirmed that there is not any child labour in the facility. Employees confirmed that overtime is voluntations and all original documents are in custody of employees. Employees were aware of workers council roles and responsibilities and confirmed that they can approach directly to facility management in case of any issue.

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

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

Facility does not have any workers union. Interview was conducted with representative of joint workers welfare council. Worker representative confirmed that he is aware of their rights and responsibilities also confirmed that he was freely elected through election process. Worker representative also confirmed that the meetings are conducted on quarterly bases and the role of workers council was effective.

O: Attitude of managers: (Include attitude to audit, and audit process. Both positive and negative information should be included)

The facility management was professional through out the audit process. Facility's management is aware about the client's requirements and they have multiple customer audits. They have adopted the social compliance management system based on SA8000 Management system principles although facility is not SA8000 certified. Facility has social compliance department that is head by Group Manager HR and Compliance. Department is responsible for effective implementation of legal and social compliance within the facility. Facility's management conduct annual management review meetings to analysis any need to resources for effective implementation of system.

### Audit Results by Clause

#### 0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

#### 0.A. Guidance for Observations

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:

Facility has a Social compliance policy, endorsed at the highest level and covering human rights impacts and issues. Overall responsibility for meeting the standards was taken by the Mr. Asim Ali Shah (Group Manager HR, Admin & Compliance).

- Facility identified their stakeholders and salient issues.
- Facility addressed adverse impact on human rights within any of their stakeholders.
- Facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Details: Human rights policies
- Employee training records
- Worker interviews

Any other comments: Nil

A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details: Facility has developed human rights policy also it is displayed on notice boards for employee's awareness.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	Yes No Please give details: Name: Muhammad Sarfaraz Job title: Manager Compliance
C: 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?	Yes No C1: Please give details: Facility has established suggestion and complaint mechanism. Also, employees can approach higher management directly
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights- compatible, a source of continuous learning and based on stakeholder engagement)	Yes No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	Yes No E1: Please give details: Facility has system for documents and data protection that is addressed in documents and data control procedure. Also, data available in IT system is secured through implemented IT security policy.

Findings			
Finding: Observation       Company NC         Description of observation:       None Observed	Objective evidence observed:		
	Not applicable		
Local law or ETI/Additional elements / customer specific requirement: Not applicable			
Comments: Not applicable			

Good examples observed:	
Description of Good Example (GE): Not observed	Objective Evidence Observed: Not applicable.

### Measuring Workplace Impact

Workplace Impact			
A: 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)	A1: Last year: 2020 5.5%	A2: This year: 2021 5.9%	
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	6.1%		
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 6.3%	C2: This year January to June-2021 5.9% %	
D: 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	6.3%		
E: Are accidents recorded?	Yes No E1: Please describe: Facility maintains accident and injury records for all accidents and injuries occurred in the facility.		
F: Annual Number of work-related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worker rs]	F1: Last year: 2020 Number: 0.9	F2: This year: January to June 2021 Number: 1.1	
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	1		
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: None	H2: This year: None	
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers	

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers

#### **0B: Management system and Code Implementation**

(Click here to return to summary of findings)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 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.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.4 Suppliers are expected to communicate this Code to all employees.

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

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

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

#### Current systems:

- The facility has established HR and Compliance department lead by Group Manager HR and Compliance Mr. Asim Ali Shah to ensure the implementation of local laws and international labour standards requirements.
- The facility has developed social compliance manual that includes written policies and procedure to address workers' wages and compensations and working hour records, no forced labour, no child labour, and health & safety etc.
- Facility management was found aware of local law requirements concerning, child labour, wages, hours of work, health and safety, environments etc. moreover facility obtains law updates from labour department and has subscription of different law websites.
- Facility was maintaining workers personal files, wages, and compensation records (Salaries, overtime, and leaves).
- Facility had installed biometric system thumb impression and face scanning system for recording working hours of the workers.
- Local government departments like Labour department, electrical department and Civil defence departments were conducting annual inspections at the facility.
- The facility had obtained firefighting equipment inspection report from civil defence, labour inspection report on "Form C" from labour officer, electrical installation fitness certificate from Electric Officer.
- The facility had displayed ETI Base code in native language at production floors and notice boards to communicate with the workers.
- Facility was conducting internal audits to ensure proper implementation of local law and ETI code requirements, last audit was conducted dated 18~20 June 2020. The facility had established Human Resources department and appointed Mr. Asim Ali Shah (GM HR, Admin & Compliance) to ensure the implementation of local laws and international labour standards requirements.
- The facility had written policies and procedure to address workers' wages and compensations and working hour records, no forced labour, no child labour, and health & safety etc.

- Facility management was found aware of local law requirements concerning, child labour, wages, hours of work, health and safety, environments etc. moreover facility obtains law updates from labour department and has subscription of different law websites.
- Facility was maintaining workers personal files, wages, and compensation records (Salaries, overtime, and leaves).
- Facility had installed card scanning system for recording working hours of the workers.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Details: Social compliance policy
- Social compliance manual.
- Internal audit
- Management system
- Safety checklists
- Job descriptions of responsible persons

Any other comments: Nil

Management Systems:			
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<ul> <li>☐ Yes</li> <li>☑ No</li> <li>A1: Please give details: Facility does not have any fines in past 12 months.</li> </ul>		
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: Facility has developed policies and displayed in departments for employee's awareness.		
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies available in all areas (child labour, forced labour, Health and Safety, Living Wage, Working Hours, no harsh treatment, Environment and Business Ethics); these are communicated to workers via poster and trainings. Last training of Labour Standard and workplace condition was conducted on <u>17-03-2021</u> .		
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: Facility has annual training plan and trainings are conducted on regular frequency. All managers and supervisors are trained on company policies and procedures		

E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	Yes No E1: Please give details: Orientation training to all new hiring on daily basis and records are kept in personal files. Workers were found familiar with facility policies during worker interviews.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i>	Yes No F1: Please give details: Please give details: Facility has valid ISO 9001:2015, GOTS, OCS, Fair Trade, Oekotex-100, and fair trade.
G: Is there a Human Resources manager/department? If Yes, please detail.	Yes No G1: Please give details: Facility has HR department that is head by Group GM HR and compliance.
H: Is there a senior person / manager responsible for implementation of the code	Yes No H1: Please give details: Mr. Asim Ali Shah Group GM HR and compliance is responsible.
I: Is there a policy to ensure all worker information is confidential?	Yes No I1: Please give details: Policy is developed to maintain all the confidential personal records of the workers were maintained in employee's personal file, which are accessible to concern personal.
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: Worker information / personal files are kept under lock and key at HR & Compliance office.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	Yes No K1: Please give details: Yearly risk assessment / internal audit are being conducted to evaluate effectiveness of policy and procedures. Last risk assessment was conducted on 01-07-2020.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	Yes No L1Please give details: Issues pointed out during risk assessment /internal audit are brought to the attention of senior management and correction was made. Last internal audit report compiled on 18~20 June 2020.

M: Does the facility have a policy/code which require labour standards of its own suppliers?	Yes No M1: Please give details: The Company established social policy and displayed in each department, and, in social policy the company showed their commitment to comply local labour law, ILO conventions and customer code of conduct.
Land rig	hts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: The site is registered with Directorate of Labour Welfare, Government of the Punjab
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	Yes No O1: Please give details: Manager Compliance was responsible to ensure the due diligence requirement
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior, and informed consent, (FPIC) even if national/local law does not require it	Yes X No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	Yes No Q1: Please give details: The land ownership belongs to company's own ownership
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☐ Yes ⊠ No R1: Please give details:
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ⊠ No S1: Please give details:

Non-compliance:

<ul> <li><b>1. Description of non-compliance:</b></li> <li>NC against ETI/Additional Elements</li> <li>NC against customer code:</li> <li>None Observed</li> </ul>	NC against Local Law	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers) Not applicable
Local law and/or ETI requirement: Not Applicable Recommended corrective action: Not Applicable		

Observation:		
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable	

Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:
Facility has provided notice boards near main gate and at various places throughout the facility. Legal laws, Facility's code of conduct, Customers code of conduct, ETI Base code and other information's are displayed for employee's awareness.	Site visit

#### 1: Freely Chosen Employment

(Click here to return to summary of findings)

ETI

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:

- Facility has developed hiring policy and procedures also facility has established forced and bonded labour policy and implemented.
- During audit, no forced labour or bonded labour found and workers interview confirmed the same.
- No prison labour found during audit process.
- Facility only retains copy of national identity card in personnel files
- Facility provided appointment contract to each worker, as per contract, workers is allowed to leave facility outside working hours anytime and resign with one month notice.
- Overtime is voluntary; workers are free to do overtime and they are not forced by facility for overtime working.
- Facility has no long-term loan scheme is in practice.

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

#### Details:

- Hiring policy
- Appointment contract
- Facility rules
- Resignation records
- Employee handbook
- Management and worker interview

Any other comments: Nil

A: Is there any evidence of	Yes
retention of original documents,	X No
e.g. passports/ID's	A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ⊠ No B1: If yes, please give details and category of worker affected:

C: Is there any evidence of retention of wages /deposits	☐ Yes ⊠ No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding: During workers interview it was found that workers are free to resign from their services following legal requirement
E: 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?	<ul> <li>Yes</li> <li>No</li> <li>⊠ Not applicable</li> <li>E1: Please describe finding:</li> </ul>
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ⊠ No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No No G1: If yes, please give details and category of workers affected: Facility has communicated their code of conduct that includes force labour policy to their suppliers and restrict them for the force labour.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	Yes No H1: Please describe finding: Suppliers are being visited by Manager Compliance to examine their systems.

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law: NC against customer code: None Observed	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement Not applicable. Recommended corrective action: Not applicable		

Observation:

Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable.
Good Examples observed:	
Description of Good Example (GE): None Observed	Objective evidence observed:
	Not applicable.

#### 2: Freedom of Association and Right to Collective Bargaining are Respected

(Click here to return to summary of findings)

(Click here to return to Key Information)

#### ETI

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:

- Facility provided workers' rights to form any union. Facility management has established freedom of association policy and procedure in social compliance manual.
- Facility management has Joint Workers Welfare Council system in place. In which male and female both members are present.
- Workers elected worker representative through election process.
- The Joint Workers Welfare Council meets on quarterly bases, discusses the worker's issues and complaints, and provides its recommendations to the managements for the rectification of the issues.
- Total 8 member from workers of different departments were elected and 08 members from management side were nominated for joint workers welfare council.

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Freedom of Association policy and procedures
- Joint Workers Welfare Council Election records
- Joint Workers Welfare Council meeting records
- Complain log and boxes
- Interview with worker representative

Any other comments: Nil

	Union (name)
representation/union is there on	$\boxtimes$ Worker Committee (Joint Workers Welfare Council)
site?	Other (specify)

	r		
	None		
B: Is it a legal requirement to have a union?	⊠ Yes □ No		
C: Is it a legal requirement to have a worker's committee?	∑ Yes □ No		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<ul> <li>Yes</li> <li>No</li> <li>D1: Please give details: Facility has health and safety committee in place. Canteen committee in place.</li> <li>D2: Is there evidence of free elections?</li> <li>Yes</li> <li>No</li> </ul>		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<ul> <li>Yes</li> <li>No</li> <li>E1: Please give details: As per interview with worker representative, it was noted that facility management is flexible and supportive to workers committee activities.</li> </ul>		
F: Name of union and union representative, if applicable:	Facility does not have union.	F1: Is there evidence of free elections?	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Joint Workers Council	G1: Is there evidence of free elections? Xes No N/A	
H: Are all workers aware of who their representatives are?	Yes 🗌 No		
I: Were worker representatives freely elected?	Yes 🗌 No	I1: Date of last election: 01-01-2020. Election occurs after every two years.	
J: Do workers know what topics can be raised with their representatives?	Yes 🗌 No		
K: Were worker representatives/union representatives interviewed?	Yes No If <b>Yes</b> , please state how many: One worker representative was interviewed in confidential manner.		
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Last meeting was conducted dated 18-06-2021, and Meeting minutes are posted at production floors and available to workers and Last meeting topics covered implementation of company's code of conduct in an effective manner, Improve health and safety practices, cleanliness of drinking water points, need for awareness sessions on employee's rights for employees, Availability of MSDS. has been discussed.		

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	Yes 🛛 No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1:% workers covered by Union CBA	M1:% workers covered by Union CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	Yes No	

Non-compliance:		
<ul> <li>1. Description of non-compliance:</li> <li>NC against ETI</li></ul>	<b>Objective evidence</b> observed: (where relevant please add photo numbers) Workers interview	

Observation:		
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	<b>Objective evidence</b> <b>observed:</b> Not applicable	
Good Examples observed:		
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable.	

#### 3: Working Conditions are Safe and Hygienic

<u>(Click here to return to summary of findings)</u> (Click here to return to Key Information)

ETI

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:

- Facility has developed H&S policy in social manual and implemented throughout the facility.
- Facility has installed Fire equipment. Evacuation map mounted in all departments. Fire alarm installed in each department. Regular inspection done for all fire equipment.
- Emergency telephone numbers defined in facility.
- Drinking water provided to all workers.
- Safety posters and signs displayed in all the department for workers awareness,
- First aid box mounted in the facility with proper medical supply and regular inspection conducted by compliance team.
- Pathways, Emergency exit found open and clear without any obstruction.
- All moving parts of machineries are well covered and fenced except some needle guards of stitching machines was missing and pulley cover missing.
- Adequate no. of toilets provided separately gender wise.
- Facility has obtained building stability certificate and approved layout plan.
- Facility has obtained Fire license confirming compliance of all fire equipment installed within facility.
- Facility has provided PPEs to workers as per their job nature.
- Facility does health and safety risk assessment periodically.
- Facility has appointed Mr. Muhammad Sarfraz (Deputy Manager Compliance) and Mr. Muhammad Sadiq (Assistant Manager H &S) to implement health and safety management system in the facility.
- Facility provides trainings like, PPEs, First aid, firefighting, fire drill on periodic basis.
- No major accident occurred so far in the facility however, minor injuries found recorded. Facility
  maintained accident and injury log.

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Use of PPEs training conducted on 17-03-2021
- Awareness about seasonal and occupational disease like COVID-19 carried on 17-03-2021

- Awareness about aids given on 01-02-03-June-2021
- Firefighting, emergency and First aid training performed on 01-06-2021
- Emergency Action plan training conducted on 1-06-2020
- Chemical handling and spillage control 11-03-2021
- Manual handling of materials and machine safety given on 17-03-2021
- Awareness about Hygiene and EHS general training conducted on 17-03-2021
- Canteen hygiene inspection conducted by Food Inspector of 28-06-2021
- Verified the canteen staff medical staff test report last on 16-11-2020
- Internal audit 18~20 June 2020.
- Waste Management and handling training 09-03-2021
- ETI base code training last conducted on 24-06-2021
- Health and Safety Committee last meeting on 15-06-2021
- Fire evacuation drill day shift last conducted on 22-05-2021 in both day and night shifts.
- Awareness about EMS (Environment Management System) date 20-05-2020

#### EHS Inspection / Testing record:

- List of fire cylinder/trolleys, Emergency shower and Eye Wash Stations, Fire Hydrant and hose reel, fire alarm, Emergency light inspection record for the month of 03-06-2021 verified and found satisfiability
- Verified the certificate of competency of First-Class Boiler Engineer Mr. Hafiz Arsalan Ahmad, certificate#2144, year 2016
- Certificate for structural stability (Elcon Associate) Number 10987 29-4-2019 valid until next construction.
- Civil Defence inspection report regarding firefighting arrangement date 07-12-2020
- Review the risk assessment which found last update in 30-06-2021
- Drinking water test report date 22-06-2021 performed by SEAL Laboratory Pakistan.
- Noise monitoring test report date 22-06-2021 performed by SEAL Laboratory Pakistan.
- Wastewater test report date 29-06-2021 performed by SEAL Laboratory Pakistan.
- Stack emission monitoring of Generators conducted on 22-06-2021 by SEAL Laboratory Pakistan
- Stack emission monitoring of Boilers conducted on 22-06-2021 by SEAL Laboratory Pakistan
- Stack emission monitoring of Fork lifters conducted on by 22-06-2021 SEAL Laboratory Pakistan
- Lux monitoring conducted on by 22-06-2021 SEAL Laboratory Pakistan
- Fitness certificate of Lift date 15-04-2021 by Farooq Industries
- Electrical inspection conducted on 28-11-2020 by Govt. approved contractors
- Trained Electricians certificate # 00644
- Review the Accident/ Incident information records and found that last incident reported on 03-05-2021
- Review the waste disposal agreement which made with AT Waste Management

### Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Health and safety policy and procedure.
- Certificate of building stability
- Electrical installation inspection report
- Evacuation drill records
- Firefighting equipment inspection certificate of Civil Defence department
- EHS trainings like first aid and fire fighting
- Health and safety inspection reports.
- Machineries and equipment inspection reports.
- Test reports of drinking water

Any other comments: Nil		
A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	Yes No A1:Please give details: The policies are included in workers manual and displayed at all the production floors.	
B: Are the policies included in workers' manuals?	Yes No B1:Please give details: Health & Safety policies and procedures included in workers manual.	
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<ul> <li>☐ Yes</li> <li>☑ No</li> <li>C1: Please give details: No extension found in building.</li> </ul>	
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: Facility has provided H&S orientation and PPE during site tour.	
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	Yes No E1: Please give details: Facility has provided medical room on site. Although facility has trained first aiders on the production floors.	
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	Yes No F1: Please give details: facility has provided first aid boxes and trained workers on first aid.	
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	Yes No G1: Please give details: Transportation vehicles maintained by competent and trained designated personnel.	
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<ul> <li>☐ Yes</li> <li>☑ No</li> <li>H1: Please give details: Facility has not provided any dormitory.</li> </ul>	
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Yes No I1: Please give details: H&S Risk Assessment found conducted and operational control found define.	
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	Yes No J1: Please give details: The facility has applied and inspected by Environmental Protection Agency.	
K: Is the site meeting its customer       Yes         requirements on environmental       No         standards, including the use of banned       K1: Please give details: Facility is not involved in chemical         related process.       related process.		
---	--	--
Non-compliance:		
<ul> <li>1. Description of non-compliance:</li> <li>NC against ETI NC against Local Law NC against customer code:</li> <li>Based from facility tour it was noted monthly inspection of 02 fire extinguish found not conducted in fabric inspection department.</li> <li>Local law and/or ETI requirement</li> <li>Ref ETI: 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.</li> <li>Local law: In accordance with Factories Act 1934Chapter-03 Health and Safety section 25, Precaution in case of fire (8) the means of escape to be provided in case of fire and the nature and amount of firefighting apparatus to be provided and maintained.</li> <li>Recommended corrective action:</li> <li>Facility should ensure that all firefighting equipment's should inspected on regular frequency.</li> </ul>	Objective evidence observed: (where relevant please add photo numbers) Observed during Site visit Please refer to Non- Compliance Photo Image HS (1)	
<ul> <li>2. Description of non-compliance:</li> <li>NC against ETI NC against Local Law NC against customer code:</li> <li>Based from facility tour it was noted that Un-identified chemical bottles (using for stain removing) found available in fabric inspection, moreover safety data sheet not available at the point of use.</li> <li>Local law and/or ETI requirement:</li> <li>Ref ETI: 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.</li> <li>Local Law: In accordance with the Hazardous substance Rule 2003, Section 9 (1) (a) packing &amp; labelling. In accordance with the Hazardous substance Rule 2003, Section 9 (1) (a) packing &amp; labelling, it can be stored, transported and used without leakage, and safely:</li> <li>Recommended corrective action:</li> <li>Facility should ensure that chemical bottles should be provided with identifications and labelling and safety data sheet available at the point of use.</li> <li><b>3. Description of non-compliance:</b></li> </ul>	Observed during Site visit Please refer to Non- Compliance Photo Image HS(2)	

NC against ETI	NC against Local Law	NC against customer	Observed during Site visit
Based on facility tour it wa equipment's but approxim inspection department, gr employee was found doir gloves also 1 employee ir	nately 30% employees in w eige storage area was no ng welding work near me n chemical mixing area without gloves. PPEs (hea area <mark>.</mark>	rovided personal protective veaving department, greige ot using face mask. Also, one echanical workshop without of printing department was ad and bear cover) found	Please refer to Non- Compliance Photo Image HS (3)
-		nt shall be provided, bearing	
in mind the prevailing knc Adequate steps shall be ta out of, associated with, or	owledge of the industry a aken to prevent accident occurring in the course o	ind of any specific hazards. ts and injury to health arising of work, by minimising, so far rds inherent in the working	
Local Law: In accordance - (1) 11. Personal protectiv in the processes covered	e equipment - (1) all work by this Schedule shall be sonal protective equipme enic condition before issu	ule 1952: Spillage and waste kers exposed to the hazards e provided with appropriate ent. Such equipment shall be ue.	
Facility should conduct aw	vareness sessions for empl	loyees and make the	
process effective. Monitori using PPEs.	ing should be improved to	o ensure the employees are	
code:	NC against Local Law	□ NC against customer	Observed during Site visit
near toilets in sizing depar	tment but there is no any d untidy Housekeeping ne	as provided washing points y soap and tissues provided ed to improve of washroom	Please refer to Non- Compliance Photo Image HS (4)
Local law and/or ETI requir			
in mind the prevailing knc Adequate steps shall be ta out of, associated with, or	owledge of the industry a aken to prevent accident occurring in the course c	nt shall be provided, bearing and of any specific hazards. and injury to health arising of work, by minimising, so far rds inherent in the working	
Local law: In accordance	e with the Punjab Facto	ories Rules 1978, section 41,	
Provision for washing ac facilities shall be provided f shall be provided and ke	commodation: 41. In e for the workers: (c) Soap n pt available for workers nt shall be made for the r e former appear unclean	very factory, the following ail brushes and clean towels free of cost at every wash replacement of used towels	

Facility should ensure that toilets should remain in hygienic conditions and washing points should be stocked with supplies like soap and tissues.	
5. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Observed during Site visit Please refer to Non- Compliance Photo
Based from facility tour it was noted that poor housekeeping and cigarette buds were found in dining hall and un-hygienic handling of canteen food items observed, moreover fly catcher found not functional in canteen area. Local law and/or ETI requirement:	Image HS (5)
· · ·	
Ref ETI: 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.	
Local law: In accordance with Factories Act 1934 Chapter-03 Health and Safety	
section 13, Cleanliness:(1) Every factory shall be kept clean and free from	
effluvia arising from any drain, privy or other nuisance, and in particular, -(a)	
Accumulation of dirt and refuse shall be removed daily by sweeping or by any	
other effective method from the floors and benches of work-rooms and from	
staircases and disposed of in a suitable manner;(b) The floor of every work-room	
shall be cleaned at least once in every week by washing, using disinfectant	
where necessary or by some other effective method.	
Recommended corrective action:	
Facility should make sure that housekeeping of canteen and food items should	
be up to the mark also fly catchers should be functional at all times. Also,	
facility should ensure that there should be no smoking in this public area	
(Canteen)	

Observation:	
Description of observation: None Observed Local law or ETI requirement:	Objective evidence observed:
Not applicable Recommended corrective action:	Not applicable.
Not applicable.	

Good Examples observed:	
J 1	Objective Evidence Observed: Workers interview and document review

# 4: Child Labour Shall Not Be Used

<u>(Click here to return to summary of findings)</u> <u>(Click here to return to Key Information)</u>

### ETI

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:

- No child labour found during site tour and reported during interview of workers and management.
- Underage workers are not allowed in the facility. Minimum age to work is 18 years.
- Facility does not hire child labour; all workers are above 18 years.
- Facility described in their hiring procedures that at the time of hiring Human Resources department checked age verification documents such as (National identity card, B-form, Birth Certificate).
- Child labour Policy communicated to all management staff and workers are aware about that policy.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Personnel File
- Appointment letter
- Procedure for Child Labour
- Procedure of hiring
- Workers interview
- Age Verification Documents
- Policy of child labour
- Site Tour

Any other comments:

Nil

A: Legal age of employment:	15 years of age. (Restricted work only), 18 years of age. (Full time work)
B: Age of youngest worker found:	18 years and 8 months and 15 days

C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ⊠ No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subjects to hazardous work assignments? (Go to clause 3 – Health and Safety)	<ul> <li>Yes</li> <li>No</li> <li>E1: If yes, give details N/A. No workers below 18 years employed in the facility.</li> </ul>

code:       (where         None Observed       add pl         Local law and/or ETI requirement:	ctive evidence ved: e relevant please hoto numbers) pplicable.

Observation:	
Description of observation: None Observed Local law or ETI requirement: Not applicable	Objective evidence observed: Not applicable.
Comments: Not applicable.	

Good Examples observed:		
	<b>Objective Evidence</b> <b>Observed:</b> Not applicable.	

### 5: Living Wages are Paid

<u>(Click here to return to summary of findings)</u> <u>(Click here to return to Key information)</u>

ETI

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:

- Facility has Compensation & Benefits policy and procedure in its social compliance manual. As
  per policy facility provides compensations and benefits to all the employees as per state law.
  Employees are paid their salary / wages in form of hard cash and bank transferring along with
  itemized pay stub. Over time hours are compensated at double rate than that of average pay /
  wages. Company facilitates all the employees with legal benefits like social security, group
  insurance, old age benefits, bonus (as per company's annual profit), annual leaves (or
  encashment) maternity and other leaves.
- During documents review and workers interview it was noted that facility was paying PKR 17500 per month and PKR 673.07 per day as minimum wage to unskilled workers.
- Mr. Asim Ali Shah (Group Manager HR & Compliance) is responsible person to take actions on complaint / objection logged / raised and discusses this matter in workers committee meeting and resolves it on priority basis.
- Facility was keeping record of the workers wage and wage slips were provided to the workers.
- Facility is paying Employees old age contribution of all employees. During audit contribution
  payment records reviewed for the last three months which were updated and in accordance
  with legal requirements.
- Facility is paying social security of all employees. Contribution payment records reviewed for the last three months during audit and found updated.
- Facility provides Group Insurance benefits to all permanent workers through Jublee Life Insurance against policy number 20190002240517006.
- Facility is paying gratuity to all workers at their resignation or termination from service, this has also confirmed during worker interviews and review full and final settlement cases during audit.

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Payroll and payment record of 52 samples for the month May 2021 (Current Month)
  - o 52 samples for the month March 2021 (Random Month)
  - o 52 samples for the month December 2020 (Random Month)
- Production records

- Wage slips of the workers
- Record of social security and EOBI
- Record of group insurance
- Record of full and final settlement of leaving workers
- Leave Record of the workers.

Any other comments: Nil

Non-compliance:		
1. Description of non-compliance:         NC against ETI       NC against Local Law         None Observed         Local law and/or ETI requirement:         Not applicable         Recommended corrective action:         Not applicable.	Objective evidence observed: (where relevant please add photo numbers) Not applicable	

Observation:

Description of observation: None Observed	Objective evidence observed:
Local law or ETI requirement:	
Not applicable	
Comments:	None Observed
Not applicable	

Good Examples observed:			
Description of Good Example (GE):	Objective Evidence Observed:		
<ul> <li>Facility has provided subsidized food to all employees. Also, once in every month facility provides free of cost meals to all employees.</li> </ul>	Workers interview		
<ul> <li>Facility has provided free of cost transport to employees.</li> </ul>	Workers interview		

# **Summary Information**

Criteria	<b>Local Law</b> (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours:	Legal maximum:	A1: 08 hours /	A2:
	08 hours / day,	day,	Xes

	1		
(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	48 hours / week, No requirement for monthly maximum working hours	48 hours / week, No requirement for monthly maximum working hours	□ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 02 hours / day, 12 hours / week, No requirement for monthly maximum Overtime hours	B1: 2 hours per day 12 hours /week, No requirement for monthly maximum Overtime hours	B2: X Yes No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: PKR 84.13/hour, PKR 673.07/day, PKR 3750/ week, PKR 17500/ Month	C1: PKR 84.13/hour, PKR 673.07/day, PKR 3750/ week, PKR 17500/ Month	C2: Yes No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Week days: 200% of normal working hour rate; Rest day: 200%: Gazetted holidays: 300 % Legal OT Formula: Gross salary/26 (month days)/8 (day worked hrs) x 2(premium rate x OT hrs worked	D1: Weekday: 200% of normal working hour rate Gazetted holidays/ Rest day: No rest day work was noted during the audit.	D2: Yes No

Wages analysis: (Click here to return to Key Information)		
A: Were accurate records shown at the first request?	⊠ Yes □ No	
A1: If <b>No</b> , why not?	N/A	
B: 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	52 samples for the month May 2021 (Current Month) 52 samples for the month March 2021 (Random Month) 52 samples for the month December 2020 (Random Month)	

Practice Guidance and Measurement Criteria)					
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	Yes No		<ul> <li>Unskilled ( PKR 17500</li> <li>Semi-Skille 18488 per</li> </ul>	ker, Machine Operator): PKR	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	Xes No N/A		D1: If <b>No</b> , plea	ase give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	min emp Meet The Above per Ove Dec		employees and p The factory pa per month to Overtime: 0 P Deduction: EC	owest actual wages found: Note: full time loyees and please state hour / week / month etc factory paid at least Pak Rupees 17,500 month to production employees; ertime: 0 Pak Rupees luction: EOBI 130 Pak Rupees ss salary : 17,370 Pak Rupees	
F: Please indicate the breakdown of workforce per earnings:	F1: 0% of workforce earning under minimum wage F2: 70% of workforce earning minimum wage F3: 30% of workforce earning above minimum wage				
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. All employees are paid annual bonus as per law one-month gross salary. Last bonus was paid in the month of September 2020 for the years 2019 to 2020				
H: What deductions are required by law e.g. social insurance? Please state all types:	Income tax, EOBI (as per discretion of employer either to make deduction or not)				
I: Have these deductions been made?	Yes No	deduc	ase list all ctions that <b>not</b> been	<ol> <li>EOBI</li> <li>Nil</li> <li>Please describe: 01% old age benefit deduction and absent are a legal requirement.</li> <li>Income tax</li> <li>Nil</li> </ol>	
	made.			Please describe: workers does not meet and come into income tax slabs.	

J: Were appropriate records available to verify hours of work and wages?	∑ Yes ☐ No	
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ⊠ No	К1: Туре
		<ul> <li>Poor record keeping</li> <li>Isolated incident</li> <li>Repeated occurrence:</li> </ul>
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	Yes No L1: Please give details: All the meetings conducted on monthly basis with in the facility timings.	
M: Is there a defined living wage: This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ⊠ No M1: Please specify amount/time:	
M2: If yes, what was the calculation method used.	ISEAL/Anker BenchmarksAsia Floor WageFigures provided by UnionsLiving Wage Foundation UKFair Wear Wage LadderFairtrade FoundationOther – please give details:	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	Yes No N1: Please give details: Government announces raise in minimum wage on every year then all the companies are subjected to raise wage as per notification.	
O: Are workers paid in a timely manner in line with local law?	∑ Yes □ No	
P: Is there evidence that equal rates are being paid for equal work:	Yes No P1: Please give details: Payment structure is fair and transparent.	
Q: How are workers paid:	<ul> <li>Cash</li> <li>Cheque</li> <li>Bank Transfer</li> <li>Other</li> <li>Q1: If other, please explain:</li> </ul>	

# 6: Working Hours are not Excessive

<u>(Click here to return to summary of findings)</u> <u>(Click here to return to Key Information)</u>

# ETI

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 <u>all</u> of the following are met:

- this is allowed by national law;

- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;

- appropriate safeguards are taken to protect the workers' health and safety; and

- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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:

- Facility has defined working hours in appointment letter, Overtime hours paid double than normal rate, overtime working is on voluntary basis.
- During workers interview, workers are free to leave the company after working.
- Working hours in the facility is 8 hours per day and 48 hours per week.
- Facility has installed thumb-scanning and face scanning systems for recording the workers working hours in the facility, but due to COVID19 card scanning system is used
- The facility has three shifts timing as below;
  - Shift General 9:00 to 18:00 (Office, stitching)
    - Shift A 6:00 to 14:00 (process, weaving, security and utilities)
    - Shift B 14:00 to 22:00 (process, weaving, security and utilities)
    - Shift C 22:00 to 06:00 (process, weaving, security and utilities)
- One day off in a week is provided. In addition, all gazetted and festival holidays allowed to workers that is paid accordingly.

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Time Sheet Records 0f 52 samples for the month May 2021 (Current Month) 52 samples for the month March 2021 (Random Month) 52 samples for the month December 2020 (Random Month)
- Deduction on Payroll
- Employment contract
- Personal file
- Production record
- Working hour policy and procedure.
- Workers interview

Any other comments:

Nil

Non-compliance:	
1. Description of non-compliance:   NC against ETI   NC against Local Law   NC against customer   code:   None Observed   Local law and/or ETI requirement:   Not Applicable   Recommended corrective action:   Not Applicable	<b>Objective evidence observed:</b> Not Applicable

Observation:		
Description of observation: None Observed Local law or ETI requirement: Not applicable	Objective evidence observed:	
Comments: Not applicable	Not applicable.	

	Good Examples observed:	
Description of Good Example (GE):		Objective Evidence Observed:

None Observed	Not applicable.

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: Biomet	etric Thumb Impression and Face scanning machine	
B: Is sample size same as in wages section?	Yes D No B1: If no, please (	give details	
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	X Yes No	⊠ Yes □ No	
D: Are there any other types of contracts/employment	Yes X No	☐ Yes ⊠ No	
agreements used?		0 hrs Part time Variable hrs Other	
		If "Other", Please define:	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ⊠ No	☐ Yes ⊠ No	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: 1 in 7 days 2 in 14 days	F2: Please select all applicable: I in 7 days 2 in 14 days No If 'No', please explain:	

	□No If 'No', please explain:		
	Maximum number of days worked without a day off (in sample):		
	6		
Standard/Contracted Ho	ours worked		
G: Were standard	☐ Yes ⊠ No	G1: If yes, % of workers & frequency:	
working hours over 48 hours per week found?			
H: Any local	Yes	H1: If yes, please give details:	
waivers/local law or permissions which allow averaging/annualised hours for this site?	⊠ No □ Yes ⊠ No	G1: If yes, % of workers & frequency:	
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	<ul> <li>Highest OT hours:</li> <li>2 overtime hours per day, 6 overtime hours per week and 26 overtime hours per month in current month May 2021.</li> <li>2 overtime hours per day, 12 overtime hours per week and 36 overtime hours per month in March 2021 (Random Month)</li> <li>2 overtime hours per day, 12 overtime hours per week and 36 overtime hours per month in December 2020 (Random Month)</li> </ul>		
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<ul> <li>Yes</li> <li>No</li> <li>Working hours found under limit both normal working hours and no OT hours observed in sample months.</li> </ul>		
K: Approximate percentage of total workers on highest overtime hours:	_4%		
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Details has given in the employment contract and employees handbook that if required overtime is voluntary.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages: 200% of the normal wages	

	N/A – there is no legal requirement to OT premium	Rest day: No rest day over time work was noted during the audit. However, facility have policy to pay the overtime premium as required by law, in case of any urgent work, that is 200 % of the normal wage if overtime during the weekdays and rest days and 300 % during gazetted holidays.
N: Is overtime paid at a premium?	X Yes No	N1: If yes, please describe % of workers & frequency: 100 % employees who worked overtime, facility is paying overtime 200% of normal wage.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes	<ul> <li>No</li> <li>Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium)</li> <li>Collective Bargaining agreements</li> <li>Other</li> </ul>	
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	Not Applicable	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	<ul> <li>Overtime is voluntary</li> <li>Onsite Collective bargaining allows 60+ hours/week</li> <li>Safeguards are in place to protect worker's health and safety</li> <li>Site can demonstrate exceptional circumstances</li> <li>Other reasons (please specify)</li> </ul>	
complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	Nil	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ⊠ No Q1: If yes, please give details:	
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ⊠ No	

# 7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

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

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

# Current systems:

- The facility has developed a policy and procedure regarding Non-discrimination. Reviewed facility documentation clearly and proves that facility with existing laws and regulations and well understood its requirements, confirmed through management interviewed.
- The facility hiring procedure and advertisement for hiring do not violate this principle.
- The facility does not do require any pregnancy or blood test before the recruitment as confirmed by the workers during the workers interviewed.
- 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, political affiliation. Employee grading is based on employee skills and experience Confirmed through document reviewed and workers interviewed.
- The facility is in an area where the main community is villager and therefore majority of employees are villager were in the facility. When the documents reviewed and employees interviewed confirmed that the facility does not consider the applicant's ethnic, social group, gender, cast and positioning when hiring the employees
- The facility management respects the human rights confirmed by the management interviewed.
- The facility provided the equal pay to male/female employees, based on skills and working experience.
- No worker was required to do the examination of the hepatitis B virus and HIV.
- The facility provides the legal benefits verified through the employees interviewed and document reviewed. (E.g. Holidays records, special festival holidays etc.)
- The workers can complain any matter directly to the management or through workers' committee or Suggestion box, confirmed through the workers interviewed.
- The facility has no experience of related issues of discrimination of last one year verified through the employee interviews.
- There was no evidence of sexual harassment.
- Mr. Asim Ali Shah Group Manager HR and Compliance is responsible for communicating, training, deploying and monitoring and ensuring the implementation of discrimination policy and procedure.

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- The hiring and termination procedure leave application records and employee handbook.
- Payrolls
- Attendance records
- Termination records
- Training records

Any other comments: Nil		
Any other comments: Nil		

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 98 % A2: Female 02 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	04 (female supervisor in stitching)
C: 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?:	<ul> <li>Hiring</li> <li>Compensation</li> <li>Access to training</li> <li>Promotion</li> <li>Termination or retirement</li> <li>No evidence of discrimination found</li> <li>C1: Please give details: Facility has hired both female and male workers also workers belong to difference races and religions. No discrimination found in compensation related matters confirmed during payroll review and worker's interview.</li> </ul>

Professional Development		
A: What type of training and development are available for workers?	Health and safety training and internal job orientation training is provided, and company supports if any workers wish to attend any seminar from outsource to provide recommendation letter for ease of attending the seminar/training.	

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	⊠ Yes □ No
	If no, please give details:

Non-compliance:

<b>1. Description of non-compliance:</b> NC against ETI       NC against Local Law         NC against ETI       NC against Local Law         NC against ETI       NC against Local Law	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Not applicable.

Observation:		
Description of observation: None Observed Local law or ETI requirement:	Objective evidence observed:	
Not applicable Not applicable	Not applicable	

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None observed	Not applicable.

# 8: Regular Employment Is Provided

<u>(Click here to return to summary of findings)</u> <u>(Click here to return to Key Information)</u>

### ETI

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:

- Facility management has issued maintained recognized employment relationship through national labour law & regulations.
- During audit and documents review, it was noted that company had issued an appointment letter at the time of hiring to all workers.
- Appointment letter defined all terms and condition of employment.
- No casual and seasonal workers were found hired in the facility during document review, facility visit and worker's interview.
- Facility does not use home workers.

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

# Details:

- Hiring procedure
- Personnel Files
- EOBI records
- Payroll records
- Workers employment contract
- Time sheet

• Workers interview

Any other comments: Nil

Non-compliance:	
<b>1. Description of non-compliance:</b> <ul> <li>NC against ETI</li> <li>NC against Local Law</li> <li>NC against customer code:</li> </ul>	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
None Observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Not applicable.

Observation:		
Description of observation: None Observed Local law or ETI requirement:	Objective evidence observed:	
Not applicable Comments: Not applicable	Not applicable	

Good Examples observed:	
	Objective Evidence Observed:
None Observed	Not applicable.

# **Responsible Recruitment**

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they	<ul> <li>Terms &amp; Conditions presented</li> <li>Understood by workers</li> <li>Same as actual conditions</li> </ul>

understand them and are they same as current conditions?	A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits, or bonds for the purpose of recruitment/placement?	Yes No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	Recruitment / hiring fees         Service fees         Application costs         Recommendation fees         Placement fees         Administrative, overhead or processing fees         Skills tests         Certifications         Medical screenings         Passports/ID's         Work / resident permits         Birth certificates         Police clearance fees         Any transport costs between workplace and home         Any relocation costs after commencement of employment         New hire training / orientation fees         Medical exam fees         Deposit bonds or other deposits         Any other non-monetary assets         Other -         C1: If other, please give details:
D: If any checked, give details:	Nil

### Migrant Workers:

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

A: Type of work undertaken by migrant workers:	There was no migrant	worker employed
B: Please give details about recruitment agencies for migrant workers:		country recruitment agencies) used: utside of local country) recruitment
C: 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?	Yes No N/A C1: Please describe finding:	☐ Yes ☐ No N/A C1: Please describe finding:

D: Are Any migrant workers in skilled, technical, or management roles	Yes No D1: If yes, number and example of roles: Not applicable.
Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	

# NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	
B: If yes, check all that apply:	Recruitment / hiring fees         Service fees         Application costs         Recommendation fees         Placement fees         Administrative, overhead or processing fees         Skills tests         Certifications         Medical screenings         Passports/ID's         Work / resident permits         Birth certificates         Police clearance fees         Any transport costs between work place and home         Any relocation costs after commencement of employment         New hire training / orientation fees         Medical exam fees         Deposit bonds or other deposits         Any other non-monetary assets         Other
C: If any checked, give details:	N/A

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.)	
A: Number of agencies used (average):	A1: Names if available: Not Applicable, no agency workers employed in the facility.

B: Were agency workers' age / pay / hours included within the scope of this audit?	Yes No
C: Were sufficient documents for agency workers available for review?	Yes No
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No E1: Please give details:

<b>Contractors:</b> Note: 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,	
A: Any contractors on site?	<ul> <li>☐ Yes</li> <li>⊠ No</li> <li>A1: If yes, how many contractors are present, please give details:</li> </ul>
B: If <b>Yes</b> , how many workers supplied by contractors?	Not applicable
C: Do all contractor workers understand their terms of employment?	☐ Yes ☐ No C1: Please describe finding: Not applicable
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	Not applicable.

#### 8A: Sub–Contracting and Homeworking

(Click here to return to summary of findings)

(Click here to return to Key Information)

8A.1 There should be no sub-contracting unless previously agreed with the main client.
 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

#### **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:

- Facility is not being used any subcontracted for current processes.
- The facility does not practice homework process and as per the management interviews, the outsource practices are also not required.
- Facility has all process in house.
- No homeworking was found onsite

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

If any processes are sub-contracted - please populate below boxes

Details:

- Site tour (Calculation on total production and estimated capacity)
- Materials in/out records
- Management interview
- Worker interview

# Non-compliance:

<b>1. Description of non-compliance:</b> NC against ETI/Additional Elements         NC against customer code:	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)
None Observed Local law and/or ETI /Additional Elements requirement: Not applicable	Not applicable.
Recommended corrective action: Not applicable	

Observation:	
Description of observation: None Observed Local law or ETI/Additional elements requirement:	Objective evidence observed:
Not applicable.	Not applicable

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
Not applicable.	Not applicable.

Summary of sub-contracting – if applicable  Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	☐ Yes ☐ No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If <b>Yes</b> , summarise details:
C: Number of sub- contractors/agents used:	
D: Is there a site policy on sub- contracting?	Yes No

	D1: If <b>Yes</b> , summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable Not Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No A1: If <b>Yes</b> , summarise d	etails:		
B: Number of homeworkers	B1: Male:	B2: Female	2:	Total:
C: Are homeworkers employed direct or through agents?	Directly Through Agents		C1: If throu agents:	igh agents, number of
D: Is there a site policy on homeworking?	Yes No			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?				
F: What processes are carried out by homeworkers?				
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No			
	G1: Please give details	:		
H: Are full records of homeworkers available at the site?	Yes No			

### 9: No Harsh or Inhumane Treatment is Allowed (Click here to return to summary of findings)

ETI

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.

Additional elements:

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

A: 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 3 <sup>rd</sup> party?	Yes No A1: Please give details: facility has Joint Workers Welfare Council in place by which workers can complain and issue their grievances to the management.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Yes, workers are aware of the channel.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has Joint Workers Welfare Council in place by which workers can complain and issue their grievances to the management and Complain box also mounted.
D: Which of the following groups is there a grievance mechanism in place for?	<ul> <li>Workers</li> <li>Communities</li> <li>Suppliers</li> <li>Other</li> </ul> D1: Please give details: facility has detail grievance procedure.
E: Are there any open disputes?	☐ Yes ☑ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	Yes No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	Yes No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	Yes No H1: If no, please give details

I: Does the disciplinary procedure allow	Yes
for deductions from wages (fines) for	No
disciplinary purposes (see wages	
section)?	11: If yes, please give details

<b>Current Systems and Evidence Examined</b> 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.		
<ul> <li>Current systems:</li> <li>Facility management has maintained disciplinary procedure and grievance procedure.</li> <li>As per procedure, workers interview and personnel record review no harsh behaviour noted from the management side at any level.</li> <li>Complain and suggestion boxes found mounted in the facility.</li> <li>Workers are aware how to file complain and what are the steps involved for grievance reporting.</li> </ul>		
Evidence examined – to support system description (Documents examined & rel renewal/expiry date where appropriate):	evant comments. Include	
Details: • Disciplinary procedure • Grievance procedure • Personnel files • Grievance log • Site tour • Workers interview.		
Any other comments: Nil		
Non-compliance:		
1. Description of non-compliance:         NC against ETI       NC against Local Law       NC against customer code:         None Observed       None Observed         Local law and/or ETI requirement:       Not applicable         Recommended corrective action:       Not applicable	Objective evidence observed: (where relevant please add photo numbers) Not applicable.	
Observe l'au		
Observation:		
Description of observation: None Observed	Objective evidence observed:	

Local law or ETI requirement: Not applicable	None Observed	
Comments: Not applicable		
Good Examples observed:		

Description of Good Example (GE):
-----------------------------------

None Observed

Objective Evidence Observed:

Not applicable.

#### 10. Other Issue areas: 10A: Entitlement to Work and Immigration

(Click here to return to NC-table)

#### Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.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:

- No migrant worker employed.
- Per document review, factory management representation and worker interview, all workers in the factory were Pakistani, 100 % local workers.
- All workers had recruited directly by the factory and no agency was involved in factory's recruitment processes. No agency staff or foreign worker was used by the factory.

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Policy and procedure for employment in the factory
- List of workers
- Facility visit observed workers actually working on the floor

Any other comments: Nil

Non-compliance:			
1. Description of non-compliance:         NC against ETI/Additional Elements       NC against Local Law         NC against customer code:       Non observed         Local law and/or ETI /Additional Elements requirement:         Not applicable         Recommended corrective action:         Not applicable	Objective evidence observed: (where relevant please add photo numbers) Not applicable		

Observation:

Description of observation: None Observed Local law or ETI/Additional Elements requirement:	Objective evidence observed:	
Not applicable Comments: Not applicable	Not applicable.	

Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
None Observed	Not applicable.

# 10. Other issue areas 10B4: Environment 4-Pillar

(Click here to return to summary of findings)

To be completed for a 4-Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

# **B.4. Compliance Requirements**

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

10B4.2 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.

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 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).

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

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

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

# **B4. Guidance for Observations**

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

10B4.11 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:

- Factory has appointed Mr. Muhammad Sarfraz (Deputy Manager Compliance) and Mr. Muhammad Sadiq (Assistant Manager H &S) to implement health and safety management system in the factory.
- Factory has valid Environmental Approval from Environmental Protection Agency (EPA) Ref. DD(EIA)/EPA/F-41(EIA)/0912/2011/937, date 23-12-2011.
- Factory has developed Environmental Policy and procedure.
- Internal audit of Environmental found conducted on 18~20 June 2020
- Factory provides trainings like, PPEs and environmental drill on periodic basis.
- Chemical handling, use of PPEs, chemical storage date 20-04-2021
- Environmental Management manual (Ref.# EMS-01.0)
- Procedure for Emergency and Chemical Spill Response (HSE/2/2008)

- EMS Risk Assessment
- Noise monitoring test report date 22-06-2021 performed by SEAL Laboratory Pakistan.
- Wastewater test report date 29-06-2021 performed by SEAL Laboratory Pakistan.
- Stack emission monitoring of Generators conducted on 22-06-2021 by SEAL Laboratory Pakistan
- Stack emission monitoring of Boilers conducted on 22-06-2021 by SEAL Laboratory Pakistan
- Stack emission monitoring of Fork lifters conducted on by 22-06-2021 SEAL Laboratory Pakistan
- Lux monitoring conducted on by 22-06-2021 SEAL Laboratory Pakistan
- Review the Environmental Accident/ Incident information records and found that last incident reported on 03-05-2021
- Review the waste disposal agreement which made with AT Waste Management

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Environmental Health and safety policy and procedure.
- Environment trainings like PPE, waste and chemical handling
- Material safety data sheet
- Risk assessment
- Test reports

Any other comments: None

Non-compliance:		
1. Description of non-compliance:         Image: NC against ETI/Additional Elements         Image: NC against Customer code:         Non observed	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI/Additional Elements requirement: Not applicable Recommended corrective action: Not applicable	Not applicable	

Observation:		
<b>Description of observation:</b> Not applicable	Objective evidence observed:	
Local law or ETI/Additional elements requirements:		
Not applicable	Not applicable	
Comments:		
Not applicable		

Good examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
Not applicable	Not applicable

<b>Environmental Analysis</b> (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)		
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Asim Ali Shah (Group Manager HR & Compliance) responsible for all environmental matters.	
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes No B1: Please give details: Risk assessment found conducted by the facility including all environmental aspects.	
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	☐ Yes ⊠ No C1: Please give details: Facility not certified on ISO 14001 certification.	
D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)	Yes No D1: If yes, is it publicly available? Facility environmental commitment available on below web link. http://www.mksons.com/environment.html	
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	Yes No E1: Please give details: In commitment to the environmental policy facility is adapting sustainable practices regard waste minimization and pollution prevention.	
F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)	🛛 Yes 🗌 No	
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. (For guidance, please see Measurement criteria)	Yes No G1: Please give details: Facility is certified on STEP certification valid till 28- 02-2023.	
H: Have all legally required permits been shown? Please gives details.	Yes No H1: Please give details: During audit, all legal permits presented by the facility and reviewed	
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	Yes No N/A I1: Please give details: Chemical inventory recorded in SAP system.	
J: Is there a system for managing client's requirements and legislation in the destination	∑ Yes □ No J1: Please give details:	
countries regarding environmental and chemical issues?	The facility has all the lega use of chemicals at site	Il requirements regarding
---	---	--
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	Yes No K1: Please give details: Environmental objective and targets reviewed that found measurable and targeted with the period.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☐ Yes ⊠ No L1: Please give details:	
M: 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?	Yes No M1: Please give details: Facility found establish the environmental objective and targets.	
N: 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?	Yes No N1: Please give details: Not applicable because facility does not involve in any sub-contracting activities.	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: <u>Jan – Dec 2020</u>	Current Year: Please state period: <u>Jan – May 2021</u>
Electricity Usage: Kw/hrs	19758385 KWH	8383894 KWH
Renewable Energy Usage: Kw/hrs	Nil	Nil
Gas Usage: Kw/hrs	223790 MMBTU	61786 MMBTU
Has site completed any carbon Footprint Analysis?	🗌 Yes 🖾 No	🗌 Yes 🖾 No
If <b>Yes</b> , please state result		
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Ground water	Ground water
Water Volume Used: (m³)	1076687 m3	513590 m3
Water Discharged: Please list all receiving waters/recipients.	ETP Municipal drain	ETP Municipal drain
Water Volume Discharged: (m³)	861383 m3	411233 m3

Water Volume Recycled: (m <sup>3</sup> )	Nil	Nil
Total waste Produced (please state units)	210873551 kg	1094374 kg
Total hazardous waste Produced: (please state units)	139782 kg	61617 kg
Waste to Recycling: (please state units)	Nil	Nil
Waste to Landfill: (please state units)	Nil	Nil
Waste to other: (please give details and state units)	Nil	Nil
Total Product Produced (please state units)	44924405 meter fabric, 8892786 pcs made ups.	4105257 meter fabric/ month, 5848116 pcs made ups product.

#### **10C: Business Ethics – 4-Pillar Audit** <u>(Click here to return to summary of findings)</u> To be completed for a 4–Pillar SMETA Audit

#### 10C. Compliance Requirements

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

10C.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.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.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.

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

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

10C.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

10C.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. 10C.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:

Facility has defined anti- Bribery, Fraud, Corruption & Theft Policy. As per policy facility is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. Facility has zero tolerance towards such behaviour of bribery or corruption.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

# Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details: Facility anti-bribery policy Training on Anti Bribery, Fraud and theft give to sale, marketing and procurement staff on

Any other comments:

Non-compliance:		
1. Description of non-compliance:         Image: NC against ETI/Additional Elements         Image: NC against customer code:	<b>Objective evidence</b> <b>observed:</b> (where relevant please add photo numbers)	
None Observed Local law and/or ETI/Additional Elements requirement: Not applicable Recommended corrective action: Not applicable	Not applicable	

Observation	
Description of observation: None Observed Local law or ETI/Additional elements requirement:	Objective evidence observed:
Not applicable Comments: Not applicable	Not applicable.

Good examples observed:	
Description of Good Example (GE):	<b>Objective Evidence</b> <b>Observed:</b> Not applicable.
None Observed	Not applicable.

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as	<ul> <li>Internal Policy</li> <li>Policy for third parties including suppliers</li> </ul>
appropriate?	A1: Please give details:
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	Yes No

	B1: Please give details: Training on Anti Bribery, Fraud and theft give to sale, marketing and procurement staff on 28-06-2021
C: Is the policy updated on a regular (as	X Yes
needed) basis?	L No
	C1: Please give details: Policy updated on regular basis.
D: Does the site require third parties	X Yes
including suppliers to complete their own	
business ethics training	
business ethics training	
	D1: Please give details: Facility found conducted last
	supplier evaluation in 08-10-2020 including the basis of
	business ethics and training of BSCI/ETI code of conduct.

Other findings

#### Other Findings Outside the Scope of the Code

Nil

#### **Community Benefits**

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

Nil

## **Appendix 1**

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

 $\boxtimes$  Not Applicable please x

### **Photo Form**















Weaving department

Sizing department

### Warping department





not using gloves

Finish fabric folding area

**Embroidery section** 





Beacon lights provided with fire alarm in high noise area









Non-Conformance Photos:



NC photo HS(1) monthly inspection status card of Fire extinguisher missing NC photo HS (2), stain removing chemical bottle not labelled

NC photo HS (3), Welding employee not using gloves





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

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

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

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

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d

#### Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

#### **Click here for Auditors:**

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