




# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 10188937	Sedex Site Reference: (only available on Sedex System)	ZS: 1009409
Business name (Company name):	Deeps Textstyles Private Limited.		
Site name:	Deeps Textstyles Private Limited.		
Site address: (Please include full address)	New Mukherjee Para Road, Akra Krishnanagar, P.S. Maheshtala, Dist. South 24 Parganas, 700140. Kolkata, West Bengal	Country:	India
Site contact and job title:	Mr. Soumodip Ghosal - Director		
Site phone:	+91-33-25831262	Site e-mail:	soumodip@deepstexstyles.com; pinki@deepstexstyles.com;
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	21-01-2020 to 22-01-2020		

<b>Audit Company Name &amp; Logo:</b> 	<b>Report Owner (payer):</b> Deeps Textstyles Private Limited
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			



## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 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): NA

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

Lead auditor: Mr. Sameer Edsikar APSCA number: 21702835

Lead auditor APSCA status: Registered Auditor

Team auditor: Nil APSCA number: NA

Interviewers: Mr. Sameer Edsikar APSCA number: 21702835

Report writer: Mr. Sameer Edsikar

Report reviewer: Mr. Syed Alamdar - Shiraz

Date of declaration: 22-01-2020

*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

Issue (please click on the issue title to go direct to the appropriate audit results by clause) <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A <a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>				Nil
0B <a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
1. <a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
2. <a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
3. <a href="#">Safety and Hygienic Conditions</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
4. <a href="#">Child Labour</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
5. <a href="#">Living Wages and Benefits</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
6. <a href="#">Working Hours</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
7. <a href="#">Discrimination</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				Nil
8. <a href="#">Regular Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
8A <a href="#">Sub-Contracting and Homeworking</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil

9	Harsh or Inhumane Treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
10B2	Environment 2-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				NA
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Nil

#### General observations and summary of the site:

The Factory Deeps Textstyles Pvt Ltd Located in New Mukherjee Para Road, Akra Krishnanagar, P.S. Maheshtala, Dist. South 24 Parganas, 700 140. Kolkata, West Bengal.

Factory is in Manufacturing of Printed Woven & Knitted Garments. This facility has production capacity of 500000 Nos/ANNUM

1 shift running in this unit from 9:00 AM to 5:30 PM

A total of 51 Employees, 06 Managers & Staff, 44 On roll Workers, 01 Guards, are currently working in the facility.

Male – 42

Female – 02

It was observed from workers interview and management interaction, workers are quite happy to work in this facility

*\*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:	Deeps Textstyles Private Limited.	
B: Site name:	Deeps Textstyles Private Limited.	
C: GPS location: (If available)	GPS Address: New Mukherjee Para Road, Akra Krishnanagar, P.S. Maheshtala, Dist. South 24 Parganas, 700 140. Kolkata, West Bengal	Latitude: 22.512751 Longitude: 88.214943
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Facility has obtained all required and applicable license and certificates.</p> <p>Factory License – License no - 19023 Date of Issue 18-12-18 Validity – 31-12-23 Issued by Govt. Of West Bengal Authorised for 100 workers and 50 HP</p> <p>IEC Certificate – No-0208028510 Dated 17-03-2009</p> <p>GST Certificate – No – 19AADCD0635Q1ZB Dated 27-02-18.</p> <p>Building Stability Certificate – Dated – 01-03-19 issued by Bhowmik Lahirri Engineering and supervision co</p> <p>PCB Consent order – Consent No- 33/30WBPCB/ARO/0(36)/2013 Dated 28-10-18 Valid up to-31-11-23 Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981 Issued by WBPCB</p> <p>Fire NOC – No - IND/WB/FSL/19-20/201492 Dated 28-09-19 Valid up to 22-09-21 Issued by Fire License Section Kolkata.</p>	

E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of woven and knitted garments																	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Deeps Textstyles Pvt Ltd Located in New Mukherjee Para Road, Akra Krishnanagar, P.S. Maheshtala, Dist. South 24 Parganas, 700 140. Kolkata, West Bengal.</p> <table border="1"> <thead> <tr> <th>Production Building no</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground Floor</td> <td>Printing - Cutting - ETP, Fabric store</td> <td>Well maintained</td> </tr> <tr> <td>Second Floor</td> <td>Office, Finishing</td> <td>Well maintained</td> </tr> <tr> <td>Third Floor</td> <td>Stitching, FG Store</td> <td>Well maintained</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td></td> </tr> </tbody> </table> <p>Factory has started production since 2009  Plot Area- 4000 Sq. Feet  Build up Area - 2800 Sq. Feet  This facility has production capacity of 466410 Unit per Annum.  1 shift running in this unit from 9:00 AM to 5:30 PM</p> <p>A total of 51 Employees, 06 Managers &amp; Staff, 44 On roll Workers, 01 Guards, are currently working in the facility.</p> <p>Male – 42  Female – 02</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No any notable cracks observed on the day of Audit.</p> <p>F3: Does the site have a structural engineer evaluation?  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>F4: Please give details:  Building Stability Certificate –  Dated – 01-03-19 issued by Bhowmik Lahirri Engineering and supervision co</p>			Production Building no	Description	Remark, if any	Ground Floor	Printing - Cutting - ETP, Fabric store	Well maintained	Second Floor	Office, Finishing	Well maintained	Third Floor	Stitching, FG Store	Well maintained	Is this a shared building?	No	
Production Building no	Description	Remark, if any																
Ground Floor	Printing - Cutting - ETP, Fabric store	Well maintained																
Second Floor	Office, Finishing	Well maintained																
Third Floor	Stitching, FG Store	Well maintained																
Is this a shared building?	No																	

G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	No Peak Season
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Fabric received - Cutting - Printing - Stitching - finishing - storing - trading -exporting.
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 10.00 HRS A2: Day 1 Time out: 18.00 HRS	A3: Day 2 Time in: 10.00 HRS A4: Day 2 Time out: 14.00 HRS	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	1.5 Audit Days		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other  If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail:    weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If <b>Yes</b> , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Soumodip Ghosal – Director.		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	12-11-18 to 13-11-18		
J: Previous audit type:	Announced - Periodic		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives
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	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	NA		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Trade Union not available in company		

## 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	
Worker numbers – Male	42	00	00	00	00	00	00	42
Worker numbers – female	02	00	00	00	00	00	00	02
Total	44	00	00	00	00	00	00	44
Number of Workers interviewed – male	08	00	00	00	00	00	00	08
Number of Workers interviewed – female	02	00	00	00	00	00	00	02
Total – interviewed sample size	10	00	00	00	00	00	00	10



A: Nationality of Management	100% Indian Management.	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: _Indian_____ B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If no, please describe how this may vary during peak periods: No peak season.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 __100%____ C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: _____% hourly paid workers D2: _100%_____% salaried workers  Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: __100%_____% monthly paid D6: _____% other D7: If other, please give details	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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)	1 group of 4 workers – 4 workers	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 02
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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Workers Don't have any complaints, all interviewed workers have positive attitude to management and company.	
I: What did the workers like the most about working at this site?	Pay structure & Timely payment. Good management relation. Treatment is given like family members	
J: Any additional comment(s) regarding interviews:	Most workers are enjoyed working at this company, they felt they had to do work assigned to them only, and multitasking is not done with them and good relationship with management.	
K: Attitude of workers to hours worked:	Positive	
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*

All 10 interviewed employees were satisfied with the management and facility environment and no negative. Information was reported during interview on the day of audit.

All workers were assured about the confidentiality and they spoke freely on their views of the factory.

All interviewed employees confirmed that they are comfortable in their workplace and they are free to express their concerns directly to the management.

They have system to make suggestions to their supervisors, managers and team leaders with help of suggestion box.

**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*

In this factory Workers union is not present, however workers from this site has formed committee called as Workers committee.

Worker representative interviewed during audit process and he was present in opening meeting also.

Workers committee consists of 10 members, 5 are from Management and 5 are from workers site. Workers committee meeting are organised once in quarter and the members of works committee are re-elected every after 2 years.

It was noticed from workers interviews, workers are happy to work in this factory as the working culture is good and factory care for them.

It is observed during interaction with committee member that

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

Auditor entered to the factory at 9:45 AM, first meet with Ms. Pinki Chatterjee ( HR Manager)

Audit started with an opening meeting.

Scope, Criteria & Standard explained with the auditee. Role and responsibility of Auditor explained. List of documents required to review the documents explained to the management. Group and individual workers interviews requirement communicated with management. Permission to take photographs also taken.

Attitude of staff are found positive; all documents are readily available for Auditor.

Facility has conducted internal Audit to check department wise compliance before Main Audit.

Opening meeting attended by following key persons of company -

Mr. Soumodip Ghosal – Director

Ms. Pinki Chatterjee – HR Manager

Ms. Pinki Chatterjee Accompanied auditor for facility tour has accompanied Auditor for document review and answered all the questions related to the workers employments, procedures & process at the facility.

At the end of audit closing meeting was conducted with below mentioned auditee's –

Mr. Soumodip Ghosal – Director

Ms. Pinki Chatterjee – HR Manager

Post Audit procedure also discussed with Mr. Soumodip Ghosal – Director



## 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:

1. Facility has policy and procedure for Human rights.
2. They have communicated their policies to the suppliers and buyers.
3. Also, they have Business code of conduct policy and procedure.
4. Ms. Pinki Chatterjee HR Manager is the person responsible.
5. Facility has their all policies and procedure available for employees and public on their Intranet.
6. Facility has assessed business impact on human rights within any of their stakeholders.

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

Details:

Company policy and procedure – Doc Name – DTPL/SAP/01-22

Risk Assessment on policy and procedure – Doc name – DTPL/SAP

Company Code of Conduct

Any other comments: Nil

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  A1: Please give details:  Verified Human Right policy, Ethical policy.  Doc Name – DTPL/SAP/01-22</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please give details:  Name: s. Pinki Chatterjee  Job title: HR Manager</p>
<p>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?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  C1: Please give details:  Facility has a suggestion box system available to the workers.  For Suppliers and communities, Whistle blower policy is displayed, and misconduct reporting method displayed on notice board.</p>
<p>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)</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  D1: If no, please give details  Facility has grievance handling committee.  Latest MOM – 23-09-19</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  E1: Please give details:  Facility has written policy and procedure for Data privacy. Awareness training of same has been given to the workers and managers.  Company policy and procedure -  Doc Name – DTPL/SAP/01-22</p>

Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation: Nil</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>Comments:</p>	<p>Objective evidence observed:</p>

Good examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p>Objective Evidence Observed:</p>

## 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: _4.2_ %	A2: This year _3.5_ %
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]	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: _4_ %	C2: This year _3.2_ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	8%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Verified Accident register – Form no 18	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2017 -18 Number: 00	F2: This year: 2018-19 Number: 00
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]	00	
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: 00	H2: This year: 00
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months _00_ % workers	I2: 12 months _00_ % workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___00___% workers	J2: 12 months ___00___% workers
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## 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:

1. Facility has trained workers and managers on ETI code - Name of training: Social awareness Training given on 21-09-19 by Ms. Pinki Chatterjee.
2. Facility holds Code of conduct documents i.e. Code of ethics & Business Conduct in both English and local language displayed in facility premises.
3. Ms. Pinki Chatterjee Manager HR is responsible person for implementing of all the social compliances activities in the facility.
4. Facility has communicated ETI code of conduct to the suppliers verified the evidence of same. Verified mail communication.
5. ETI code of conduct has been displayed in the facility premises in local language.
6. Over all responsibilities –  
Mr. Soumodip Ghosal – Director - EHS responsibility  
Ms. Pinki Chatterjee – HR Manager – HR responsibility

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

Details:  
ETI Base Code  
Company policy and procedure  
Doc Name - Human Resource Manual  
Interaction with Management and workers

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Verified from all legal documents and other permits that facility not been subject to any fines/prosecutions for non-compliance to any regulations
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility has conduct risk assessment on policy and procedures. Verified the risk assessment of forced labour, child labour & discrimination. Doc Name - DTPL/SAP/RISK
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Social awareness training has been given to all workers and staff. Training date 21-09-19 given by Ms. Pinki Chatterjee
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Social awareness training has been given to all workers and staff. Training date 21-09-19 given by Ms. Pinki Chatterjee
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Social awareness training has been given to all workers and staff. Training date 21-09-19 given by Ms. Pinki Chatterjee
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: HR Department is available here Ms. Pink Chatterjee is the responsible person
H: Is there a senior person / manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details:

	Mr. Soumodip Ghosal – Director is the person responsible for implementation of the code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Yes, facility has data privacy policy and it covers workers information also.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Workers information related to job is kept confidential in custody of HR manager office
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has conduct risk assessment on policy and procedures. Verified the risk assessment of forced labour, child labour & discrimination. Doc Name - DTPL/SAP/RISK
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Facility has done risk assessment to evaluate policy and procedure effectiveness. Doc Name - DTPL/SAP/RISK
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has communicated the ETI & code of conduct policy to the suppliers have requested them to follow the same. Verified mail communications with supplier.
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The Land hold by the facility is on lease. Verified the lease agreement between Deeps Textstyle Private Limited & Sri Pradyut Mukherjee registration no – R/3/2/1/09
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The Land hold by the facility is on lease.

	<p>Verified the lease agreement between Deeps Textstyle Private Limited &amp; Sri Pradyut Mukherjee registration no – R/3/2/1/09.</p> <p>Land Owner and HR Manager are responsible for the Due diligence.</p>
<p>P: Does the site have a written policy and procedures specific to land rights.</p> <p>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</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>P1: If yes, how does the company obtain FPIC: Due diligence was conducted by local government authority.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Q1: Please give details: The Land hold by the facility is on lease. Verified the lease agreement between Deeps Textstyle Private Limited &amp; Sri Pradyut Mukherjee registration no – R/3/2/1/09</p>
<p>R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>R1: Please give details: NA. This land is not coming under land acquisition act.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>S1: Please give details: There is no any illegal appropriation of land; Verified from land right documents.</p>

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law</p> <p><input type="checkbox"/> NC against customer code: <b>Nil</b></p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>

Observation:	
<b>Description of observation:</b> Nil  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> Nil	<b>Objective evidence observed:</b>

## 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:

Based from interaction with employees, management and review of records-

1. Employees are recruited through a personal interview. Employees are not required to lodge any deposits or identity papers with the facility before or after joining the services.
2. The facility does not require monetary deposit or deposition of employee's original ID card such as a condition of employment.
3. Employees are free to leave at the end of their shift and there are no overtime hours done in the facility.
4. The facility does not restrict the employee's freedom of movement.

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

Details:

Company Social Policies & HR Manual.

Interaction with Management and Interview with employees

Policy and Procedure Manual - Doc Name – DTPL/SAP/01

Personnel file of workers.

Attendance, timing record.

Any other comments: Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's

☐ Yes

☒ No

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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: As per interaction with workers there is no any restrictions on workers freedom to terminate employment
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'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: As per interaction with workers and time record there is no restrictions to leave site at the end of the work day
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has conducted risk assessment of forced labour. They have found risk in workers supplier by agency.  Facility has strict policy on supplier engagement.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility has conducted risk assessment of forced labour. They have found risk in workers supplier by agency.  Facility has strict policy on supplier engagement.

**Non-compliance:**

1. Description of non-compliance:	Objective evidence observed:
<input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code: <b>Nil</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
<b>Local law and/or ETI requirement</b>	
<b>Recommended corrective action:</b>	

Observation:	
<b>Description of observation:</b> Nil  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
Description of Good Example (GE): Nil	Objective evidence observed:

## 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:

Based from the review of company policies, interaction with facility management and employees and tour of the facility, it was noted that:

- Facility encourages and respects all employees' rights to join union freely.
- Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference.
- Facility has formed Workers committee which consists of members (5 from management and 5 workmen). Meeting is held once in 3 months
  1. Grievance Redressal Committee Latest MOM – 23-03-19
  2. Workers Committee Latest MOM – 06-09-19
  3. POSH Committee – 27-05-19
  4. Suggestion box will open every after 30 Days.
- Facility has posted suggestion box at accessible location where employees can share their concerns anonymously.
- There was no evidence of suppression of employees' rights.

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

Details:

Facility Policy and Procedures

Suggestion Box.

Grievance Committee meeting Minutes

Interaction with Management and Interview with employees.

Any other comments: Nil

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Works Committee Grievance Redressal Committee Suggestion box  D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility allows committee workers to do the meetings when required. Generally, the frequency of meeting is once in 3 month.	
F: Name of union and union representative, if applicable:	NA	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Workers Committee	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Works committee members list displayed on Notice board.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election:21-11-17.

J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 02	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Election date – 21-11-17 Latest MOM – 06-09-19	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If <b>Yes</b> , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA	M2: ____% workers covered by worker rep CBA
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Nil  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b> Nil  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

**Good Examples observed:**

Description of Good Example (GE): Nil

**Objective evidence  
observed:**

### 3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

#### 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:

1. Mr. Soumodip Ghosal - Director is responsible to ensure a healthy and safe work environment in the facility.
2. The facility has established General health and safety policy, Procedure.
  - a. Emergency Preparedness plan: Doc Name -DTPL/SAP/14
  - b. Health and safety committee Latest MOM – 24-07-19
3. Facility has provided following safety equipment's and other facility.
  - Fire Extinguisher – 14
  - Verified Latest Service report
  - Hydrant system- 01
  - Hose reel – 03
  - Alarm System – 01
  - MCP – 04
  - Hooter -04
  - Assembly Point – 02
  - First aid box- 04
  - Drinking water- 01
  - Toilet –
  - Male – 03
  - Female – 02
  - Emergency lights- 08
  - Emergency Exit- 04
  - Eye Wash station – 02
  - Suggestion Box- 01
  - Lunch Area – 01

4. Facility conducts inspection for the fire extinguisher three time in month internally and externally once in a year. Verified Last inspection report.

5. Facility has provided clean and potable drinking water (01 drinking water point) to their entire Employees.Latest test was conducted by Envirocheck . Report No – ENV/1466/W/N18-19 29-03-19

6. Examination of below instruments are carried out by Unique Marketing (Competent person)

Instrument	Report No .	Due Date
Steam Boiler	Form No 09	10-06-20

7. Facility has provided appropriate and relevant personal protective equipment like (Nose Mask, Hand Gloves, Ear Plug, Apron,)at free of cost to the employee, PPE's issue record verified for the month of Aug 2019.

8. Facility conducted PPE use training to all workers - Dated 18-07-19 Conducted by Ms. Pinki Chatterjee.

9. It is evident through document review facility has arranged external agency to provide firefighting training. It was conducted  
Dated 16-07-19  
Conducted by D Max

Dated-17-09-19  
Conducted by D Max

10. Verified from the workers interview and document review; Facility has conducted Mock Drill:

Dated 16-07-19  
Conducted by D Max

Dated-17-09-19  
Conducted by D Max

11. Verified from the workers interview and document review; Facility has conducted First Aid Training:  
Dated 16-03-17  
Conducted by St John Ambulance

Dated – 25-10-19  
Conducted by St John Ambulance

12. Risk assessment of activities and incident are carried out verified the  
No – DTPL/SAP/RISK

13. Facility maintained accident register to record site accident.  
Verified Accident register as per factory act form no 18.

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

Details:

Factory Plan Layout

EHS Policy

Accident records

Firefighting, Mock drill, First Aid Training record.

Drinking Water Test report.

Instruments Examination test report.

Risk Assessment.

List of Facility

Interaction with Management and Interview with employees.

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Verified Policy and Procedure Doc Name – DTPL/SAP/01-22
B: Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: All employees receive policies at the time of induction and it is available in the employees personal file.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Verified with plan layout and site visit, there is no any additional structures are added in the premises. Facility have valid building stability certificate.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has safety guideline and visitor policy for visitor.
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Medical room not applicable here as workers strength below 500 workers. Facility has provided 4 first aid box in the premise for workers.

F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Medical room not applicable here as workers strength below 500 workers. Facility has provided 4 first aid box in the premise for workers.
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: NA, Transport facility not provided to workers.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Workers are not provided with accommodation
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Risk assessment of activities and incident are carried out. Doc Name – DTPL/SAP/RISK
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility has obtained all required and applicable license and certificates.  Factory License – License no - 19023 Date of Issue 18-12-18 Validity – 31-12-23 Issued by Govt. Of West Bengal Authorised for 100 workers and 50 HP  IEC Certificate – No-0208028510 Dated 17-03-2009  GST Certificate – No – 19AADCD0635Q1ZB Dated 27-02-18.  Building Stability Certificate – Dated – 01-03-19 issued by Bhowmik Lahirri Engineering and supervision co  PCB Consent order – Consent No- 33/30WBPCB/ARO/0(36)/2013 Dated 28-10-18 Valid up to-31-11-23 Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981 Issued by WBPCB

	Fire NOC – No - IND/WB/FSL/19-20/201492 Dated 28-09-19 Valid up to 22-09-21 Issued by Fire License Section Kolkata.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details:  Facility using GOTS Approved chemical in the printing process.

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI
☐ NC against Local Law
☐ NC against customer
code: **Nil**

Local law and/or ETI requirement

Recommended corrective action:

#### Objective evidence observed:

(where relevant please add photo numbers)

### Observation:

Description of observation: **Nil**

Local law or ETI requirement:

Recommended corrective action:

Objective evidence observed:

### Good Examples observed:

Description of Good Example (GE): **Nil**

Objective Evidence Observed:

#### 4: Child Labour Shall Not Be Used

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

##### 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:

1. Facility has displayed Child Labor policy which states that "No Child labor allowed in the factory".
2. Facility has established Child labor policy.
3. Based on the review of age proof records, physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labor or young labor observed / reported.
4. Facility has maintained valid age proof documents in the form of Voter Id Card, Pan Card & Aadhar Card.
5. The age of youngest worker found in the facility is 20 years.

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

##### Details:

1. Child labour policy
2. HR policy
3. Employees Personnel Files (Age proof records – Voter Id Card & Aadhar Card)

Any other comments: Nil

A: Legal age of employment:	Above 14 Years
B: Age of youngest worker found:	20 Years

C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	00 %
E: Are workers under 18 subject to hazardous work assignments? <a href="#">(Go to clause 3 – Health and Safety)</a>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Nil  Local law and/or ETI requirement:  Recommended corrective action:	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: Nil  Local law or ETI requirement:  Comments:	<b>Objective evidence observed:</b>

Good Examples observed:	
Description of Good Example (GE): Nil	<b>Objective Evidence Observed:</b>

## 5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

### 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:

It was noted from review of wage records and interaction with employees and management that:

1. All eligible employees are covered under Provident Fund and Employee State Insurance
2. No fines / illegal deductions are made from the wages of the employees as disciplinary measures.
3. All employees are paid on or before 7<sup>th</sup> day of every month.
4. All employees are provided with clear, written and understandable pay slip in local language.
5. All employees are paid more than the minimum wage act applicable for them.

Verified West Bengal Minimum wage w.e.f. 01-07-19 to 31-12-19

Highly Skilled – 10884 Rs/Month

Skilled -9895 Rs/Month

Unskilled-8177 Rs/Months

Semi-skilled-8996 Rs/Month

6. Facility has paying 8.33 % of total salary as bonus to the workers. Verified the Bonus payment record.

7. Facility has also extended Leave with benefits to all applicable employees as per the legal requirement. PL – 15 days and PH – 12 Days

8. Verified from the attendance and salary record of Aug 18, Sept 19, Oct 19 it was found that, workers are being paid by accurate wages and on time.

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

Details:

10 employees were interviewed, and the same numbers of records were reviewed for the month of Aug-18, Sept 19, Oct 19,

List of National and Festival Holidays.

Leave with wage records.

Interaction with management and Employees.

Any other comments: Nil

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: <b>Nil</b>  <b>Local law and/or ETI requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
<b>Description of observation:</b> Nil  <b>Local law or ETI requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b> Nil	<b>Objective Evidence Observed:</b>

## Summary Information

Criteria	Local Law (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: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 48 Hrs /Week	A1: 48 Hrs/ Week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 12 Hrs/ Week	B1: OT not performed.	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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: Semi-skilled-8996 Rs/Month	C1: Actual Lowest – 9360 Rs/Month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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: 200% of Basic	D1: OT not performed	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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<b>Wages analysis:</b> <a href="#">(Click here to return to Key Information)</a>		
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
A1: If <b>No</b> , why not?		
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 Practice Guidance and Measurement Criteria)	10 Samples from Aug 2018 - Random Month 10 Samples from Sept and Oct 19 - Current Month	
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If <b>Yes</b> , please give details: Verified West Bengal Minimum wage w.e.f. 01-07-19 to 31-12-19 Highly Skilled – 10884 Rs/Month Skilled -9895 Rs/Month Unskilled-8177 Rs/Months Semi-skilled-8996 Rs/Month
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	D1: If <b>No</b> , please give details:
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  Actual Lowest – 9360 Rs/Month
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: _100____% of workforce earning above minimum wage	
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> 8.33% yearly of Earned wages	

H: What deductions are required by law e.g. social insurance? Please state all types:	PF ESIC and PT		
I: Have these deductions been made?	<input type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. PF – 12% 2. ESIC – 0.75 3. PT – as per slab
		I2: Please list all deductions that <b>have not</b> been made.	NA  Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type  <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details:		
M: Is there a defined living wage: <i>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.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time:		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – 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).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Annual wages records have been reviewed. Once in every six month dearness allowance from state government have been revised.		

O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All Employees are getting paid by 7 <sup>th</sup> day of following month.
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: It was noticed from the workers interview and pay roll records, it was confirmed that equal rates are being paid for equal work.
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

## 6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

### 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 **all** 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:

Based from the in/Out time records, interaction with the employees and management, over time is not practiced in this unit.

1. Employees work for 6 days a week; only 1 shift is operating in this site.  
9.00 AM to 5.30 PM  
Facility maintains Manual attendance recording system for all employees.
2. Working hours analysis as follows based on available records:

For Aug 2018 Maximum working hours per months were 188 hours/Month

Average working hours of 10 selected samples were 156Hrs/Month.

Highest working Hrs 10 selected samples were found 200 Hrs /month

Lowest working Hrs 10 selected samples were found 130 Hrs /month

Sept 2019-

Average working hours of 10 selected samples were 166 Hrs/Month.  
Highest working Hrs 10 selected samples were found 206 Hrs /month  
Lowest working Hrs 10 selected samples were found 122.5 Hrs /month

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

Details:  
Review of In/out time records from Aug 18 , Sept 19 and Oct 19.  
Working Hours policy

Any other comments: Ni

#### Non-compliance:

##### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer  
code: Nil

Local law and/or ETI requirement:

Recommended corrective action:

**Objective evidence observed:**  
*(where relevant please add photo numbers)*

#### Observation:

Description of observation: Nil

Local law or ETI requirement:

Comments:

**Objective evidence observed:**

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

Working hours' analysis			
Please include time e.g. hour/week/month (Go back to Key information)			
<b>Systems &amp; Processes</b>			
A. What timekeeping systems are used: time card etc.	Describe: Manual Card Entry		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details		
C: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other	
		If "Other", Please define:	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details:	

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: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: OT not performed	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	_0____%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information
<b>Overtime Premiums</b>		

M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <b>standard</b> wages:  200%
N: Is overtime paid at a premium?	<input type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: OT Not performed
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 where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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:

It was evident from review of wage records and employees' interview that,

1. Facility does not discriminate its employees in terms of hiring, compensation, access to training, promotion, termination or retirement based on caste, national origin, religion, age, disability, gender, marital status, Sexual orientation, union membership or political affiliation or any others thereof which could lead to discrimination.
2. It was noted from wage records review; the facility provides the same pay for employees performing work of similar nature.

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

Details:

Social policy and Procedure Manual (Ethical Policy)

Salary records.

Interaction with management and Employees.

Any other comments: Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>98</u> % A2: Female <u>2</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	Nil
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training

gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found  C1: Please give details:
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Professional Development	
A: What type of training and development are available for workers?	Skill Development programme conducted Dated – 28-06-19  Conducted by HR Team

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details:
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Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: Nil  Local law and/or ETI requirement:  Recommended corrective action:	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>

Observation:	
Description of observation: Nil Local law or ETI requirement: Comments:	<b>Objective evidence observed:</b>

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

## 8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

### 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:

All workers are employed as permanent employee.

All workers are provided with appointment letter and wages are paid as per the minimum wage's notification of the West Bengal state.

PF ESIC provisions are provided to workers.

Verified the wages record for the month of Aug 18, Sept and Oct 19

PF and Challans for the month of Aug 18, Sept and Oct 19

Contracted workers not employed here

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

Details:

Facility policies

Appointment letters

Interview with workers

Interview with management.

Any other comments: Nil

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer  
code: Nil

Local law and/or ETI requirement:

Recommended corrective action:

**Objective evidence observed:**  
(where relevant please add photo numbers)

### Observation:

Description of observation: Nil

Local law or ETI requirement:

Comments:

**Objective evidence observed:**

### Good Examples observed:

Description of Good Example (GE): Nil

**Objective Evidence Observed:**

## Responsible Recruitment

### All Workers

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

- ☒ Terms & Conditions presented  
☐ Understood by workers  
☐ Same as actual 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	

<b>Migrant Workers:</b> <i>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</i>		
A: Type of work undertaken by migrant workers:	NA	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used:  B2: Total number of (outside of local country) recruitment agencies used:	
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: If yes, number and example of roles:	

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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other  B1 – If other, please give details:
C: If any checked, give details:	

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: NA
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No

C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No  E1: Please give details:

<p align="center"><b>Contractors:</b></p> <p><i>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,</i></p>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If yes, how many contractors are present, please give details: Contracted workers not employed here.
B: If <b>Yes</b> , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding:
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	

### 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:

**Verified with Audit observation, Workers interview production capacity that Facility not doing sub-contracting and home working.**

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

Details:

Workers Interview

Production records, Shipment Records Etc

**Non-compliance:**

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against customer code:  <b>Local law and/or ETI /Additional Elements requirement:</b>  <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
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Observation:	
<b>Description of observation:</b>  <b>Local law or ETI/Additional elements requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good Examples observed:	
<b>Description of Good Example (GE):</b>	<b>Objective Evidence Observed:</b>

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
<b>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</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>A1: Please describe:</b>
<b>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>B1: If <b>Yes</b>, summarise details:</b>
<b>C: Number of sub-contractors/agents used:</b>	
<b>D: Is there a site policy on sub-contracting?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> 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			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: A suggestion box is placed in the facility also grievance Redressal committee is available in the facility.
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Yes, Workers are aware of these channels. Suggestion boxes and various committees are available in the facility.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box, Whistle blowing mechanism policy.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other  D1: Please give details:  There is suggestion box and grievance Redressal committee available for workers.  Whistle blower policy and mechanism in place for suppliers and communities.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  F1: If no, please give details

G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  H1: If no, please give details
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  I1: If yes, please give details

### Current Systems and Evidence Examined

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

#### Current systems:

1. There is no evidence of harsh or inhumane treatment of employees.
2. All employees are treated with respect and dignity.
3. Facility's disciplinary policies are explained to all employees and all employees are well aware about their rights.
4. No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
5. Facility has formed Anti Sexual Harassment committee to discuss and resolve the issues.

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

Details:

Disciplinary policies.

Committee Meeting records.

Any other comments: Nil

#### Non-compliance:

<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code: Nil</p> <p><b>Local law and/or ETI requirement:</b></p> <p><b>Recommended corrective action:</b></p>	<p><b>Objective evidence observed:</b> (where relevant please add photo numbers)</p>
--	--

Observation:	
<p><b>Description of observation:</b> Nil</p> <p><b>Local law or ETI requirement:</b></p> <p><b>Comments:</b></p>	<p><b>Objective evidence observed:</b></p>

Good Examples observed:	
<p>Description of Good Example (GE): Nil</p>	<p><b>Objective Evidence Observed:</b></p>

## 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:

1. Facility has not employed migrant employees.
2. Verified from the facility policy manual and recruitment & Selection policy, they are aware about the statutory legal requirement of employee engagement.
3. Facility has maintained employment contracts, wages and working hour's records, age proofs, legally mandatory Benefits and social insurance records for all employees employed through labor contractor.
4. Based from the review of personal files of all employees, it was noted that all of them are holding the legal rights to work.

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

Details:

Recruitment policies/ Procedure.

Any other comments: Nil

#### Non-compliance:

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: <b>Nil</b>  <b>Local law and/or ETI /Additional Elements requirement:</b>   <b>Recommended corrective action:</b>	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>
--	---

Observation:	
<b>Description of observation: Nil</b>  <b>Local law or ETI/Additional Elements requirement:</b>  <b>Comments:</b>	<b>Objective evidence observed:</b>

Good examples observed:	
<b>Description of Good Example (GE): Nil</b>	<b>Objective Evidence Observed:</b>

### 10. Other issue areas 10B2: Environment 2–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

### Current Systems and Evidence Examined

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

#### Current systems:

NA this is 4 pillar Audit

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

Details:

Any other comments:

### Non-compliance:

#### 1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

#### 2. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

#### Objective evidence observed:

(where relevant please add photo numbers)

**Local law and/or ETI/Additional Elements requirement:**

**Recommended corrective action:**

**Observation:**

**Description of observation:**

**Local law or ETI/additional elements requirement:**

**Comments:**

**Objective evidence observed:**

**Good examples observed:**

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

**Objective Evidence Observed:**

## 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:

- Facility has environmental policy displayed in the factory premises.
- Person responsible for EMS – Ms. Pinki Chatterjee
- Facility has obtained all legal license and permissions

Factory License –

License no – 19023

Date of Issue 18-12-18

Validity – 31-12-23

Issued by Govt. Of West Bengal

Authorised for 100 workers and 50 HP

IEC Certificate –

No-0208028510

Dated 17-03-2009

GST Certificate –

No – 19AADCD0635Q1ZB Dated 27-02-18.

Building Stability Certificate –

Dated – 01-03-19 issued by Bhowmik Lahirri Engineering and supervision co

PCB Consent order –

Consent No- 33/30WBPCB/ARO/0(36)/2013 Dated 28-10-18

Valid up to-31-11-23

Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981

Issued by WBPCB

Fire NOC –

No - IND/WB/FSL/19-20/201492 Dated 28-09-19

Valid up to 22-09-21

Issued by Fire License Section Kolkata

- Facility maintain the records of Energy, water and other utility consumption  
Energy consumption  
17-18 – 105442 KW  
18-19 -115458 KW  
Water Consumption-  
17-18 – 450000 Ltr  
18-19 – 487819 Ltr
- Environmental impact assessment record -  
Document: Environmental Impact & Aspect.  
Verified the aspect Impact record  
Doc Name: DTPL/SAP/EMS
- Facility has monitored ambient air, noise, Stack and Waste water Verified the test reports  
Noise Level –  
No – AP/19/085A Dated 10-06-19  
Conducted by Bharat Foundation  
Ambient Air-  
No – G/19/107 Dated 11-06-19  
Conducted by Bharat Foundation
- Water is used here only for screen washing, Screen wash water collected in collection tank, Equalization tank – Dosing Tank- Storage tank, then treated water discharge municipal drainage as per WBPCB Consent order  
Wastewater test report  
No -ENV/778/E/M/19-20 Dated 04-11-19  
Conducted by Enviro Check
- Facility has sludge disposal Membership with West Bengal waste management limited  
No – ALPR/D003 dated 01-04-19  
Valid up to 31-03-20

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

## Details:

Environmental Policy is in place.  
Environmental parameters test report.  
Air & Water pollution consent certificate  
Air Ambient monitoring Testing report

Any other comments: Nil

## Non-compliance:

## 1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements ☐ NC against Local  
☐ NC against customer code: Nil

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

**Objective evidence observed:**  
(where relevant please add photo numbers)

## Observation:

Description of observation: Nil

Local law or ETI/Additional elements requirements:

Comments:

**Objective evidence observed:**

## Good examples observed:

Description of Good Example (GE): Nil

**Objective Evidence Observed:**

<b>Environmental Analysis</b> <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Ms. Pinki Chatterjee is the person responsible for Environmental issue
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Doc Name – Aspect and Impact analysis report DTPL/SAP/EMS
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details:
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available?
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details:
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Facility has obtained all legal license and permissions Factory License – License no – 19023 Date of Issue 18-12-18 Validity – 31-12-23 Issued by Govt. Of West Bengal Authorised for 100 workers and 50 HP  IEC Certificate – No-0208028510 Dated 17-03-2009  GST Certificate – No – 19AADCD0635Q1ZB Dated 27-02-18.  Building Stability Certificate –

	<p>Dated – 01-03-19 issued by Bhowmik Lahirri Engineering and supervision co</p> <p>PCB Consent order – Consent No- 33/30WBPCB/ARO/0(36)/2013 Dated 28-10-18 Valid up to-31-11-23 Consent to operate under section 26 of the water act 1974 and under section 21 of the Air act 1981 Issued by WBPCB</p> <p>Fire NOC – No - IND/WB/FSL/19-20/201492 Dated 28-09-19 Valid up to 22-09-21 Issued by Fire License Section Kolkata</p>	
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: Facility maintained accurate list of all chemicals. All chemicals used here is GOTS approved one.	
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details:	
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details:	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details:	
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details:	
<b>Usage/Discharge analysis</b>		
Criteria	Previous year: Please state period: 2017 - 2018	Current Year: Please state period: 2018 -2019

Electricity Usage: <i>Kw/hrs</i>	105442 KW	115458 KW
Renewable Energy Usage: <i>Kw/hrs</i>	Nil	Nil
Gas Usage: <i>Kw/hrs</i>	Nil	Nil
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If <b>Yes</b> , please state result	NA	NA
Water Sources: <i>Please list all sources e.g. lake, river, and local water authority.</i>	<ul style="list-style-type: none"> <li>Ground Water</li> </ul>	<ul style="list-style-type: none"> <li>Ground Water</li> </ul>
Water Volume Used: <i>(m<sup>3</sup>)</i>	450000 Ltr	487819 Ltr
Water Discharged: <i>Please list all receiving waters/recipients.</i>	<ul style="list-style-type: none"> <li>Drainage System</li> </ul>	<ul style="list-style-type: none"> <li>Drainage System</li> </ul>
Water Volume Discharged: <i>(m<sup>3</sup>)</i>	80 KL	75 KL
Water Volume Recycled: <i>(m<sup>3</sup>)</i>	Nil	Nil
Total waste Produced <i>(please state units)</i>	1200 Kgs	950 Kgs
Total hazardous waste Produced: <i>(please state units)</i>	200 Kgs	100 Kgs
Waste to Recycling: <i>(please state units)</i>	Nil	Nil
Waste to Landfill: <i>(please state units)</i>	Nil	Nil
Waste to other: <i>(please give details and state units)</i>	Nil	Nil
Total Product Produced <i>(please state units)</i>	155000 Pieces	125000 Pieces

### 10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

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:

1. Mr. Soumodip Ghosal – Director is the person responsible for policies authorization.
2. There are no issues with current local legislation. However, it was noted from the interaction with the facility management, the Facility has communicated business code of conduct to all employees through internal trainings.
3. Training has been given to the managers and supervisors for Ethical business practises on 12/05/2019.

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

Details:  
interaction with facility management.

Any other comments: Nil

#### Non-compliance:

##### 1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements  
☐ NC against customer code: **Nil**

☐ NC against Local

**Objective evidence observed:**  
*(where relevant please add photo numbers)*

**Local law and/or ETI/Additional Elements requirement:**

**Recommended corrective action:**

#### Observation

**Description of observation:** Nil

**Objective evidence observed:**

**Local law or ETI/Additional elements requirement:**

**Comments:**

#### Good examples observed:

**Description of Good Example (GE):** Nil

**Objective Evidence Observed:**

<p>A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy  <input type="checkbox"/> Policy for third parties including suppliers</p> <p>A1: Please give details:</p> <p>Verified the policies on Ethical business behaviour</p>
<p>B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>B1: Please give details:</p> <p>Facility has trained workers and managers on dated 21/05/2019.</p>
<p>C: Is the policy updated on a regular (as needed) basis?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>C1: Please give details: policy is not yet updated.</p>
<p>D: Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>D1: Please give details:</p>

Other findings

Other Findings Outside the Scope of the Code
Nil

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
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."**

☒ Not Applicable please x

## Photo Form

		
<p>#1 Notice Board Provided with all policy and Code</p>	<p>#2 Battery operated Emergency Exit signage provided</p>	<p>#3 Assembly Area provided</p>
		
<p>#4 Rubber matt for ironer</p>	<p>#5 Fire Extinguisher Provided</p>	<p>#6 Hose reel provided</p>

		
#7 Toile Facility provided	#8 Secondary Exit Provided	#9 Eye Wash Facility provided
		
#10 Screen Printing workers with proper PPE	#11 Hand Wash facility	#12 Aisle Marked with exit Arrow

		
#13 ETP section and Chemical storage	#14 Manual Call point	#15 Floor Marking
		
#16 Drinking water facility provided	#17 First Aid Box provided	#18 Suggestion Box Provided



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

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