




Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 407080843	Sedex Site Reference: (only available on Sedex System)	ZS: 407167443
Business name (Company name):	Toufiq Denim and Knit Wear Ltd.		
Site name:	Toufiq Denim and Knit Wear Ltd.		
Site address: (Please include full address)	Talbag, Savar, Dhaka	Country:	Bangladesh
Site contact and job title:	Mr. Md. Abu Syed Komol – Production Director		
Site phone:	+8801716160309	Site e-mail:	komol@sbdesignbd.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety	<input type="checkbox"/> Environment <input type="checkbox"/> Business Ethics
Date of Audit:	21 May 2019 16 July 2019		

Audit Company Name & Logo: ITS Labtest Bangladesh Ltd. 	Report Owner (payee): Toufiq Denim and Knit Wear Ltd.
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Audit Conducted By					
Commercial	<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 6.0 April 2017 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):

The audit duration took more time due to verification of the documents, but the audit support of facility management was very prompt, very transparent and no discrepancies found during the audit process.

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

Kamrul Hasan (RA 21700579),
Shahina Kader (CSR02-01-12234 AA)

Lead auditor:

Md. Kamrul Hasan

Team auditor:

Shahina Kader

Interviewers:

Md. Kamrul Hasan & Shahina Kader

Report writer:

Shahina Kader

Report reviewer:

Shahida Akhtar

Audit Company Report Reference:

A4770726

Date of declaration:

21 May 2019

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

The audit duration took less time than expected as the support of facility management was very prompt, very transparent and no discrepancies found during the audit process.

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

Ariful Islam (RA 21700959)

Lead auditor:

Ariful Islam

Team auditor:

None

Interviewers:

Ariful Islam

Report writer:

Ariful Islam

Report reviewer:

Shahida Akhtar

Audit Company Report Reference:

A4783142

Date of declaration:

16 July 2019

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.

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	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 Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				
0B Management systems and code implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	02/00			Non-Compliance: 1. Mismatch in factory license category. Current Status: Corrected 2. Leave Book is not provided. Current Status: Corrected
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
2 Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	01/00			Non-Compliance: 1. Worker Participation Committee missing. Current Status: Corrected

3	<u>Safety and Hygienic Conditions</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	17/01			<u>Non-Compliance:</u> <ol style="list-style-type: none"> 1. All area is not included in fire license. Current Status: Corrected 2. Worker Safety Committee missing. Current Status: Corrected 3. Half-yearly accidents reports did not submit to the inspector. Current Status: Corrected 4. Interconnected addressable fire detection system missing. Current Status: Not Corrected 5. Required test is not conduct in drinking water test. Current Status: Corrected 6. Facility did not have any permanent doctor and medical assistant. Current Status: Corrected 7. Lack of medical equipment. Current Status: Corrected 8. Childcare room found non-functional. Current Status: Corrected 9. No canteen in the facility. Current Status: Corrected
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									<p>10. Facility did not take machine layout plan approval. Current Status: Corrected</p> <p>11. Approved construction building plan not include all sections. Current Status: Corrected</p> <p>12. Did not take testimonial of health assessment. Current Status: Corrected</p> <p>13. Designated apron did not provide to firefighter, first aider and rescuer. Current Status: Corrected</p> <p>14. Facility did not install Public Address (PA) system. Current Status: Corrected</p> <p>15. Fire doors were not installed. Current Status: Corrected</p> <p>16. Water pressure low at hose reel. Current Status: Corrected</p> <p>17. Eye wash station was not found. Current Status: Corrected</p>
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
5	Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	04/00		01	Non-Compliance:

									<ol style="list-style-type: none"> 1. Facility could not provide time card. Current Status: Corrected 2. Did not provide annual leave benefit. Current Status: Corrected 3. Pay slip were not provided. Current Status: Corrected 4. Stamp deduction shown in salary sheet. Current Status: Corrected <p>Good Practice:</p> <ol style="list-style-type: none"> 5. Facility management provides attendance bonus to all employees as per company policy
6	Working Hours	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	05/00			<p>Non-Compliance:</p> <ol style="list-style-type: none"> 1. Working hour approval not taken. Current Status: Corrected 2. Inconsistency found in time card and salary sheet. Current Status: Corrected 3. Facility could not provide time card. Current Status: Corrected 4. Violation in daily and weekly working hours were observed. Current Status: Corrected 5. Consecutive working days found.

									Current Status: Corrected
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01/00			Non-Compliance: 1. Air emission and Noise level assessment test missing. Current Status: Corrected
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
General observations and summary of the site:									
<ul style="list-style-type: none"> The product manufactured at this site is all kind of Knit items. Overall responsibility for meeting the standards is taken by Mr. Momtaz Ahmed-Executive Director. Total 438 employees are working in the facility including 49 non-production employees. There is no piece rated employee and all are fixed rated employees. Out of 438 employees, 250 are female employees and 188 are male employees. All the employees are local (Bangladeshi). Site has completed SAQ. The youngest worker on site was 20-year-old. Facility does not have any Worker Participation committee and safety committee. There is no union and collective bargaining at this factory. It also not mandatory by Local Law. 									

- There is evidence of both male and female in management and among supervisor.
 - Site has peak season from June to November for production.
 - Site uses no sub-contractors.
 - Facility has all permanent employees.
 - Generally, the facility operates in one general shift starting from 8:00 am to 5:00 pm with 1-hour lunch break in starting from 1:00 pm to 2:00pm. But There are two shifts in knitting Section. The shift is starts from 8:00am to 5:00 pm with 1-hour lunch break in starting from 1:00 pm to 2:00pm and 8:00pm to 5:00 am with 1-hour lunch break in starting from 1:00 am to 2:00am.
 - Friday is the facility weekly holiday.
 - Standard working hours on site was in average 208 hours/month with 1 day off in every 7-day-period.
 - Legal minimum pays (BDT 8000.00) was paid to all employees and facility provides minimum wage as per Bangladesh Government Gazette dated 24th January 2019.
 - Correct Overtime hours were paid; Employees were paid 200% of minimum hourly wage for Overtime.
 - Employee's wages are calculated monthly. The payment method of the salary is Cash Pay within 7 working days of following month and the payment cycle is 1-30/31.
 - Audit scope is 01 year (from May 2018 to April 2019).
 - Audit sample is 26 according to the man power of the facility.
 - 26 Records to show wages and hours were taken from April 2019 (Current paid month), October 2018 (peak month), May 2018 (off-peak month).
 - 26 employees were selected for interview including 15 female and 11 male employees; they were interviewed as 4 groups of 5 including some mixed groups and 06 employees were interviewed individually.
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- A total 469 of employees are currently working in the facility (187 male employees and 282 female employees.)
10 workers were selected for interview session. They were interviewed as 1 group of 4 and the balances of 06 workers were interviewed individually.
10 Records to show wages and hours were taken from May 2019 and June 2019.
 - Overall responsibility for meeting the standards is taken by Mr. Md. Abu Syed Komol – Production Director.

**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:	Toufiq Denim and Knit Wear Ltd.	
B: Site name:	Toufiq Denim and Knit Wear Ltd.	
C: GPS location: (if available)	GPS Address: Talbag, Savar, Dhaka	Latitude: 23.858334 Longitude: 90.266670
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Trade License: Trade License No: 003072 Issued by Savar Municipality which is valid till 30th June 2019.</p> <p>Trade License: Trade License No: 003072 Issued by Savar Municipality which is valid till 30th June 2020.</p> <p>Fire License: DD/ Dhaka/ 26856/2017 Issued by Fire Service and Civil Défense Department which is valid up to 30 June 2019.</p> <p>Fire License: DD/ Dhaka/ 26856/2017 Issued by Fire Service and Civil Défense Department which is valid up to 30 June 2020.</p> <p>Factory license: License no 20447/Dhaka, E category, issued by Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30th June 2019.</p> <p>Factory license: License no 20447/Dhaka, F category, issued by Chief Inspector General of Industries (Govt. Of the People's Republic of Bangladesh), which is valid till 30th June 2020.</p>	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	All kinds of knit items.	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Toufiq Denim and Knit Wear Ltd. is located at Talbag, Savar, Dhaka. The facility has started its operation in 2017. Total land area of the facility premises 6400 square feet, production area is 40000 square feet and warehouse area is 4500 square feet.</p> <p>Total 469 employees are working in the facility including 94 non-production employees. Out of 469 employees, 282 are female employees and 187 are male employees.</p>	

	<p>The facility premises consist of total 01 building and 02 sheds, Buildings are made of concrete and steel. Details description provided as below.</p> <p>Details description provided of the site below</p> <table border="1"> <thead> <tr> <th>Production Building /Shed</th><th>Description</th><th>Remark, If Any</th></tr> </thead> <tbody> <tr> <td colspan="3">Building 1(6 Storied Building)</td></tr> <tr> <td>Ground Floor</td><td>Yarn store, Fabric Store, Knitting Machine</td><td>None</td></tr> <tr> <td>1st Floor</td><td>Finishing section, Inspection room, office</td><td>None</td></tr> <tr> <td>2nd Floor</td><td>Sewing Section</td><td>None</td></tr> <tr> <td>3rd Floor</td><td>Sewing Section and Child care</td><td>None</td></tr> <tr> <td>4th Floor</td><td>Cutting Section</td><td>None</td></tr> <tr> <td>5th Floor</td><td>Office Area, Finished Goods Area, Dining, Idle machine</td><td>None</td></tr> <tr> <td>Roof top</td><td>Office & vacant</td><td>None</td></tr> <tr> <td colspan="3">Shed 02</td></tr> <tr> <td>Shed-1</td><td>Generator Room, Boiler</td><td>None</td></tr> <tr> <td>Shed-2</td><td>Compressor room</td><td>None</td></tr> </tbody> </table> <p>Visible structural integrity issues (large cracks) observed?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Please give details: No such cracks were found during audit.</p> <p>Does the site have a structural engineer evaluation?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please give details: Site have a structural engineer evaluation.</p>	Production Building /Shed	Description	Remark, If Any	Building 1(6 Storied Building)			Ground Floor	Yarn store, Fabric Store, Knitting Machine	None	1 st Floor	Finishing section, Inspection room, office	None	2 nd Floor	Sewing Section	None	3 rd Floor	Sewing Section and Child care	None	4 th Floor	Cutting Section	None	5 th Floor	Office Area, Finished Goods Area, Dining, Idle machine	None	Roof top	Office & vacant	None	Shed 02			Shed-1	Generator Room, Boiler	None	Shed-2	Compressor room	None
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Shed-2	Compressor room	None																																			
G: Site function:	<p><input type="checkbox"/> Agent</p> <p><input type="checkbox"/> Factory Processing/Manufacturer</p> <p><input type="checkbox"/> Finished Product Supplier</p> <p><input type="checkbox"/> Grower</p> <p><input type="checkbox"/> Homeworker</p> <p><input type="checkbox"/> Labour Provider</p> <p><input type="checkbox"/> Pack House</p> <p><input type="checkbox"/> Primary Producer</p> <p><input type="checkbox"/> Service Provider</p> <p><input type="checkbox"/> Sub-Contractor</p>																																				
H: Month(s) of peak season: (if applicable)	Peak Month is from June to November																																				

<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Product manufactured: All kinds of Knit items.</p> <p>Main production process: Knitting-Cutting- Sewing-Ironing-Finishing- Packing</p> <p>Monthly production capacity: 600000 pieces per month.</p> <p>Machines used: Generator, Boiler, Compressor, Metal Detector Machine, Thread Sucker, Finishing Machine, Knitting Machine, Sewing machines, plain machine, Overlock machine, Bartack machine, Snub button, needle detector, vacuum iron table, fabric inspection,</p> <p>Chemical used: Diesel, spot remover, spot lifter, powder</p>
<p>J: What form of worker representation / union is there on site?</p>	<p><input type="checkbox"/> Union (name)</p> <p><input type="checkbox"/> Worker Committee</p> <p><input type="checkbox"/> Other (specify)</p> <p><input checked="" type="checkbox"/> None</p> <p>The facility does not have any participation committee.</p>
<p>K: Is there any night production work at the site?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Generally, the facility operates in one general shift starting from 8:00 am to 5:00 pm with 1-hour lunch break in starting from 1:00 pm to 2:00pm. But There are two shifts in knitting Section. The shift is starts from 8:00am to 5:00 pm with 1-hour lunch break in starting from 1:00 pm to 2:00pm and 8:00pm to 5:00 am with 1-hour lunch break in starting from 1:00 am to 2:00am.</p>
<p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If yes approx. % of workers in on site accommodation</p>
<p>M: Are there any off site provided worker accommodation buildings</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If Yes approx. % of workers</p>
<p>N: Were all site provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If No, please give details: Not applicable</p>

Audit Parameters			
A: Time in and time out	Day 1 Time in: 08:32 hrs Day 1 Time out: 21:50 hrs Day 1 Time in: 09:00 hrs Day 1 Time out: 17:30 hrs	Day 2 Time in: N/A Day 2 Time out: N/A Day 2 Time in: N/A Day 2 Time out: N/A	Day 3 Time in: N/A Day 3 Time out: N/A Day 2 Time in: N/A Day 2 Time out: N/A
B: Number of auditor days used:	02 Man-days (02 auditors in one day) 01 Man-days (01 auditor in one day)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define <input type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input checked="" type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: 0 weeks <input type="checkbox"/> Unannounced <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: 0 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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 Yes , please capture detail in appropriate audit by clause <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Momtaz Ahmed-Executive Director Mr. Md. Abu Syed Komol – Production Director		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
I: Previous audit date:	None 21 May 2019
J: Previous audit type:	None Full Initial (2 pillar)
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There is no trade union at this facility and it is not mandated by law.		

Worker Analysis

“ The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national and where they do not intend to remain permanently 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	188 187	0	0	0	0	0	0	188 187
Worker numbers – female	250 282	0	0	0	0	0	0	250 282
Total	438 469	0	0	0	0	0	0	438 469
Number of Workers interviewed – male	11 04	0	0	0	0	0	0	11 04
Number of Workers interviewed – female	15 06	0	0	0	0	0	0	15 06
Total – interviewed sample size	26 10	0	0	0	0	0	0	26 10

A: Nationality of Management	Bangladeshi
B: Nationality of workers <i>Please add more rows as applicable</i>	Countries: Bangladeshi Country 1: _____ Country 2: _____ Country 3: _____
C: For the majority nationality of workers:	Nationality 1 approx % total workforce ___100%___ Nationality 2 approx % total workforce _____ Nationality 3 approx % total workforce _____
D: Worker remuneration (management information)	_____% workers on piece rate _____% hourly paid workers ___100% salaried workers Payment cycle: _____% daily paid

	<p>_____ % weekly paid</p> <p>_____ 100% monthly paid</p> <p>_____ % other</p> <p>If other, please give details</p>
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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)	4 groups of 5 1 group of 4	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 2 Male: 2	Female: 4 Female: 4
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<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?	None	
I: What did the workers like the most about working at this site?	Overtime is fully voluntary, Wages are paid on time, working condition is hygienic, Benefits are provided more than law requirement and management are very supportive and well behaved.	
J: Any additional comment(s) regarding interviews:	No	
K: Attitude of workers to hours worked:	Favourable and fully voluntary	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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

The employees were generally positive about their work place; they got on well with workers and managers. They found management team positive and approachable.

The employees were assured of confidentiality and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. The facility management treated them with respect.

Employees can complain directly to their welfare officer, compliance responsible person or line manager and also felt free to give their general concerns to their management representative.

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

There is no working committee in the facility, but a worker was present in the meeting.

O: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

The facility management showed a positive attitude to this audit and during the whole audit process Mr. Md. Abu Syed Komol – Production Director along with their team was present through the audit process and co-operated the whole audit. Facility management respected clients' requirement and allowed auditors to take photographs of all production process, best practices and also non-conformities. They also provided photocopy of required documents and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions. The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and also have a Health & Safety committee to take care of health and safety concerns.

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to NC-table\)](#)

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:

- The responsible person for implementation and monitoring is Mr. Momtaz Ahmed-Executive Director The facility has policy and procedures for human rights.
- The facility communicates this code of conduct to the employees through notice board and orientation training.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

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

Details:

- Facility code of conduct.
- All policies of facility.
- Management, employee training / meeting records
- The responsible person for implementation and monitoring is Mr. Md. Abu Syed Komol – Production Director. The facility has policy and procedures for human rights.

Any other comments: None

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details (mainly applicable for the parent company): The facility has a social compliance policy which is a commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Momtaz Ahmed Job title: Executive Director Name: Mr. Md. Abu Syed Komol Job title: Production Director
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an independent compliance team for reporting and dealing with human rights impact without fear and it is a completely transparent system.
D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility uses software for keeping privacy of workers information. Moreover, facility has an IT policy for data safety.

Findings	
<p> Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> </p> <p> Description of observation: None observed </p> <p> Local law or ETI/Additional elements / customer specific requirement: Not applicable </p> <p> Comments: None </p>	<p> Objective evidence observed: </p> <p> None observed </p>

Good examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:
None observed

Measuring Workplace Impact

Workplace Impact		
Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	Last year: May-17 to April-18 : 5% Last year: July-17 to June-18 5%	This year: May-18 to April-19: 5% This year: July-18 to June-19 : 5%
Current % quarterly (90 days) turnover: Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	February-19 to April-19: 3% April-19 to June-19: 3%	
Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year: May-17 to April-18: 3% Last year: July-17 to June-18: 3%	This year: May-18 to April-19: 2% This year: July-18 to June-19: 2%
Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	February-18 to April-18: 4% April-18 to June-18: 4%	February-19 to April-19: 5% April-19 to June-19: 5%
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All the injuries are recorded in an injury register. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: All the injuries are recorded in an injury register.	

Annual Number of work-related accidents and injuries per 100 workers: [Number of work related accidents and injuries * 100) / Number of total workers]	Last year: May-17 to April-18: 2% Last year: July-17 to June-18: 2%	This year: May-18 to April-19: 3% This year: July-18 to June-19: 3%
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]	February-18 to April-18: 2% April-18 to June-18: 2%	February-19 to April-19: 3% April-19 to June-19: 3%
Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	Last year: May-17 to April-18: 2% Last year: July-17 to June-18: 2%	This year: May-18 to April-19: 1.5% This year: July-18 to June-19: 1.5%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	0% 0%	0% 0%
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	5% 0%	5% 0%

0B: Management system and Code Implementation

[\(click here to return to NC Table\)](#)

- 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:

- Responsibility for meeting the legal and client code requirements is taken by Md. Mr. Momtaz Ahmed-Executive Director
- The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- The ETI based code was posted on-site for employee's review.
- The facility had set up policy and pointed one staff to update labour law requirements.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- Social compliance policy statement appropriate for the nature of the facility's operation and aligned with the company's vision and an integral part of the company's strategy.
- Facility conducts periodic assessments of its social compliance system to identify improvement opportunities.
- The facility conducts orientation training for all new employees and last orientation training was conducted on 10/05/2019 with 12 participants.

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

Details:

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- Meeting records.
- Internal audit records
- Management, employee training / meeting records
- Responsibility for meeting the legal and client code requirements is taken by Mr. Md. Abu Syed Komol – Production Director

- The facility conducts orientation training for all new employees and last orientation training was conducted on 15/06/2019 with 15 participants

Any other comments: None

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The site has not been subject to any fines/prosecutions for non-compliance to any regulations in the last 12 months.
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 Please give details: It was noted through documentation review that facility has policies and procedures for forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility provides training on forced labour, child labour, discrimination, harassment & abuse on monthly basis to the management level employees. Moreover, no forced labour, child labour, discrimination, harassment & abuse was found during facility tour and employee interview.
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 Please describe: Managers were provided training for forced labour, child labour, discrimination, harassment & abuse on Mid-level Management training. Last training occurred on 1/04/2019. Last Mid-level Management training occurred on 15/07/2019.
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 Please describe: Training records were found including picture and attendance sheet.
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 Please describe: Facility has no such certifications.

G: Is there a Human Resources manager/department? If Yes, please detail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is 01 members team in Human Resources department which is headed by Mr. Momtaz Ahmed-Executive Director .
H: Is there a senior person /manager responsible for implementation of the code	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Momtaz Ahmed-Executive Director Please give details: Mr. Md. Abu Syed Komol – Production Director
I: Is there a policy to ensure all worker information is confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an IT security policy which ensures worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an effective key control procedure to keep the information confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility conduct risk assessment.
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 Details: The facility has an internal system to raise the issue found in risk assessment and to implement the way of reducing it.
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 Details: Facility has a supplier selection policy which ensures labour standard of its own supplier.
Land rights	
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 Details: The facility has all the required licenses and permissions as per legal requirements.
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 Details: the facility has anti-corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.

P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility has ownership of the building maintaining all legal procedure and no expansion was conducted.
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility maintaining all legal procedure and specific land acquisition were considered to avoid or minimize adverse impacts.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Not applicable

Non-compliance:

1. Description of non-compliance:

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

Mismatch in factory license category:

Based on factory license review and management interview, it was noted that facility has taken factory license of category "E" where facility need to obtain the license of category "F" as the total manpower of the facility was found 438 on the audit day.

Local law and/or ETI requirement

Management system and Code Implementation 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

Bangladesh Labour Rules-2015, Schedule-7 (1):

Schedule 7(1)- Factory, Industrial Establishment, Commercial Institution, Commercial Bank & Insurance Company, Shop & Contracting Establishment License Fee & License Renewal Fee.

For Factory:

Category	Maximum Number of Workers or Employees Employable in Any Day of the Year	License (Taka)	Fee	License Renewal Fee (Taka)
a	5-30	500		300

Objective evidence observed:

(where relevant please add photo numbers)

1. factory license review and management interview

b	31-50	1000	700
c	51-100	1500	1000
d	101-200	2500	1800
e	201-300	3000	2200
f	301-500	5000	3500
g	501-750	6000	4800
h	751-1000	8000	5000
i	1001-2000	10000	7000
j	2001-3000	12000	8400
k	3001-5000	15000	10000
l	l 5001- Above	18000	12000

Recommended corrective action:

It is recommended to facility management should form a Worker Participation Committee as per Bangladesh local law.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

[Partial Follow up Audit was conducted on 16 July 2019:](#)

Corrective action taken

Based on factory license review and management interview, it was noted that facility has taken factory license of category "F" as the total manpower of the facility was found 469 on the audit day.

2. Description of non-compliance:

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

Leave Book is not provided:

Based on document review and management interview it was noted through that the facility management does not provide 'Leave Book' to the employees.

Local law and/or ETI requirement

Management system and Code Implementation 0.B.1:

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

Bangladesh Labour Rules, 2015, Rule 108 (1):

108) **Leave Book:** 1) The Owner or the Manager shall provide a Leave Book to each worker in accordance with Form-9.

Recommended corrective action:

It is recommended that the facility management should provide 'Leave Book' to the employees as per rules.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

1. factory
license review
and
management
interview

2. document
review and
management
interview

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on document review and management interview it was noted through that the facility management provide 'Leave Book' to the employees.

2.document review and management interview

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:
None observed

Good Examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:
None observed

1: Freely Chosen Employment

[\(Click here to return to NC-table\)](#)

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:

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

- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labour.
- The above was confirmed in management and employee interview.

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

Details:

- Facility policy and procedure
- Sample employee personal files.
- Service book
- Employee hand book

Any other comments: None

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Facility has a policy mentioning Workers are free to terminate employment from the facility.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there is a published 'modern day slavery statement.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: <input checked="" type="checkbox"/> Not applicable Yearly production turn over 8.4 million USD
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Not Applicable

H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details and category of workers affected: Facility has established forced labour and bonded labour policy; even though they have no such type of labour <input checked="" type="checkbox"/> Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: Not Applicable The facility has policy on forced/trafficked labour to raises awareness among employees. The facility communicates it through notice board on production floor. Overtime is totally voluntary. Employees can leave their workplace freely after their respective jobs.

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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

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

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:

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union and participation committee in the facility

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

Details: Found form documents review, management and worker interview

- Participation Committee formed by election on 04 July 2019.
- Regular Participation Committee meeting is held last held on 06 July 2019.
- Meeting minutes are posted in notice board and recorded in a register.
- There are 6 members from worker's side and 6 from management side with a total of total 12 members.
- PC members are not treated less favourably than other workers.
- PC members are allowed to carry out their duties within working hours without affecting their pay.

Any other comments: None

A: What form of worker representation/union is there on site?

- ☐ Union (name)
☐ Worker Committee
☐ Other (specify)
☒ None

B: Is it a legal requirement to have a union?

- ☐ Yes
☒ No

C: Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input 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 Describe: Facility has an effective grievance handling procedure. Workers can submit their grievance verbally or in written through welfare officer or complaint box. Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: The facility does not have any participation committee. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: Facility has a policy regarding Freedom of Association.	
F: Name of union and union representative, if applicable:	Not applicable	Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees?	The facility does not have any participation committee. Participation committee; A participation committee of 12 members in place with 6 worker level members elected by the workers to represent each section of the facility.	Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The facility does not have any participation committee.
I: Were worker representatives freely elected?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The facility does not have any participation committee. Date of last election: 04 July 2019

J: Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The facility does not have any participation committee.
K: Were worker representatives/union representatives interviewed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please state how many: 00 <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 2 (1 male and 1 female).	
L: State any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	The facility does not have any participation committee. PC meeting held on once in every two months. Last meeting held on 06 July 2019 and meeting topics covered were: 1. Discussion about PC members responsibilities 2. Others Meeting minutes were recorded in register.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
N: If Yes what percentage by trade Union/worker representation	____% workers covered by Union CBA Not applicable	____% workers covered by worker rep CBA Not applicable
O: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable	

Non-compliance:	
<p>1. Description of non-compliance:</p> <div> <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: </div> <p><u>Worker Participation Committee missing:</u></p> <p>Based on management interview, worker interview and facility visit, it was noted that the facility management has not any Worker Participation Committee in the facility.</p> <p>Note that the facility has total 438 employees.</p> <p><u>Local law and/or ETI requirement</u></p> <p><u>Freedom of Association: ETI Base Code 2.1:</u></p> <p>Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p><u>Bangladesh Labour Law 2006, Section-205 (1):</u></p> <p>205. Participation Committee. - (1) The employer of every establishment in which fifty or more workers are employed shall, in the manner prescribed by rules, constitute a Participation Committee in his establishment.</p> <p><u>Recommended corrective action:</u></p> <p>It is recommended to facility management should form a Worker Participation Committee as per Bangladesh local law.</p> <p>Action by: Mr. Momtaz Ahmed-Executive Director</p> <p>Timeframe: 60 days</p> <p>Verification Method: Follow-up</p> <p><u>Partial Follow up Audit was conducted on 16 July 2019:</u></p> <p>Corrective action taken</p> <p>Based on management interview, worker interview and facility visit, it was noted that the facility management has Worker Participation Committee in the facility.</p>	<p>Objective evidence observed:</p> <p>(where relevant please add photo numbers)</p> <ol style="list-style-type: none"> Management interview, worker interview and facility visit <ol style="list-style-type: none"> Management interview, worker interview and facility visit

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed:

	None observed
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3: Working Conditions are Safe and Hygienic

[\(Click here to return to NC-table\)](#)

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

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. General Health and Safety management

- Mr. Momtaz Ahmed-Executive Director looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and Last test done on 13/05/2019 by icddr,b.
- Sufficient clean toilets segregated (14 for female and 27 for male) by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- There is no safety committee in the facility.
- Potable water was freely available in all areas and last test was done on 18 June 2019 by icddr, b.
- Mr. Md. Abu Syed Komol – Production Director looks after Health & Safety issues for the site.

2. Fire Safety

- There are 02 or more exit in each room.
- Assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up-to-date. Facility checked all fire equipment monthly schedules wise.
- The facility management posted the evacuation plans on every production floors/shed with local language.
- Facility has a firefighting team of 24 members and all are trained by the facility.
- Facility has a firefighting team of 85 members among them 40 from FSCD and 45 internal.

Fire drill Information:

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Day	10/03/2019	2 Min 45 sec	441	Senior Safety Officer

Fire drill Information:

Last fire drill	Date	Time took	Employee was present	Fire drill monitored by
Day	19/05/2019	1 Min 30 sec	476	Warehouse Inspector

Total fire equipment's were mentioned in below:

Fire Equipment Name		Total	Fire Equipment Name	Total
Fire Extinguisher	CO ₂	37	Gong bell	00
	ABC	69	Fire water drum	12
	Foam	00	Fire Water Bucket	00
	DCP	00	Stretcher	04
Hand Gloves		16	Fog light	05
Helmet		12	Exit light	12
Gas Mask		16	Shovel	28
Lock Cutter		04	Fire Blanket	18
Ear plug		22	Hose reel	12

3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 02 electricians who check and do inspection, roster wise for whole facility.
- Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
-

4. Chemical safety

- Facility does not use any hazardous chemical for their production process.
- Material Safety Data Sheets and labelling were found available for all chemicals.

5. Medical services

- There were 07 first aid boxes with sufficient kits in the full facility.
- There were 20 internal first aid certified responders.
- Facility has no appointed Doctor but 01 Nurse who are available all the time. They also arranged monthly first aid training with first aider.
- In the medical room they have more than 02 beds segregated for male and female.
- Facility has 01 appointed Doctor, 01 nurse and 01 assistant.

6. Dormitory

- Facility didn't provide dormitory facilities to any employees.

Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
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Orientation Training to factory rules	10/0519	12	HR Manager	As required
Fire Fighting Training (Internal)	05/05/2019	19	Compliance Officer	Monthly
First Aid Training	20/05/2019	20	Doctor	Monthly
Mid-level management Training	01/04/2019	16	Director Executive	As required
Health and Safety training	10/05/2019	06	Doctor	Monthly

Facility provide bellow training to employees:

Training Type	Last Date of training	Participant	Trainer Designation	Frequency of training
Orientation Training to factory rules	05/06/19	15	HR Manager	As required
Fire Fighting Training (Internal)	18/06/2019	60	Fire safety Officer	Monthly
Fire Fighting Training (external)	16/06/19	45	Warehouse Inspector	As required
First Aid Training	18/05/2019	45	Doctor	Every two month
Mid-level management Training	15/07/2019	10	HR Manager	Monthly
Health and Safety training	15/7/2019	15	HR Manager	Monthly

(Name) Inspection record	Last inspection date	Done by (designation)	Frequency of inspection
DB/SDB/MDB	12 July 2019	Electrician	Weekly
Compressor maintenance	15 July 2019	Mechanic	Weekly
Boiler maintenance	23 July 2019	Boiler operator	Weekly
Generator Maintenance	12 July 2019	Generator Operator	Weekly

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

Details:

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

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

Any other comments: None.

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The facility has general health & safety and Occupational health & safety policy and procedures which are fit for purposes and these policies are communicated through orientation training.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: The facility provide workers manual to the workers where all the policies and applicable govt. law are included.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Details: No additional structures were found with building construction approval.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Details: All the visitors to the site are informed on H&S and provided with personal protective equipment where necessary.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has medical facility for the employees. Equipment's are provided as per legal requirements.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>Please give details: The facility has 01 Nurse for medical treatment of the employees.</p> <p>Please give details: The facility has 01 Doctor, 01 Nurse and 01 assistant for medical treatment of the employees.</p>
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?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Please give details: Facility did not provide transport to the employees</p>
H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details: The facility provides personal storage space for all the employees and they are fit for purposes.</p>
I: Are H&S Risk assessments conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details: The facility conduct risk assessment and there people are in control to reduce identified risk.</p>
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please describe:</p> <p>The facility management has conducted noise and air quality assessment as required by law.</p>
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please describe: The facility meets all legal obligations on environmental requirements including required permits for use and disposal of natural resources like gas, water etc.</p>

Non-compliance:

1. Description of non-compliance:

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

All area is not included in fire license:

Based from facility fire license review and management interview it was noted that the facility has total floor area 39500 square feet, but the facility has 10080 square feet permission from fire service & Civil Defense.

-Ground floor, 3rd floor, 4th floor and 5th floor of the facility building which is used for knitting section, fabric store, sewing section, cutting section and office area where were not included in the facility fire license.

-Shed 1 and Shed 2 of the facility which is used for Boiler, Generator and Compressor was not included in fire license.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Fire Prevention and Extinguishing Act 2003, Section-4(1):

Anyone who wants to use a construction or place to be used as a warehouse or workshop then he has to take fire license under this act.

Recommended corrective action:

It is recommended that facility management should arrange all the area coverage of fire license as a step of fire prevention and fire protection.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based from facility fire license review and management interview it was noted that the facility has total floor area 39500 square feet, and facility has 39500 square feet permission from fire service & Civil Defense authority.

2. Description of non-compliance:

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

Worker Safety Committee missing:

Objective evidence observed:

(where relevant please add photo numbers)

1. Facility fire license review and management interview

1.Facility fire license review and management interview

Based on management interview, worker interview and facility visit, it was noted that the facility management has not any Worker Safety Committee in the facility.

Note that the facility has total 438 employees.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labour Rules 2015, Section-81(1):

81) **Formation of Safety Committee and other issues:** 1) As per Section 90 (a), the Owners of the institute where 50 or more workers are employed or were employed in a certain period of time in the year shall form Safety Committee. However, Safety Committee must be formed within 6 (six) months of the application of this code in the present factories/institutes or within 9 (nine) months of the application of this Code in the newly established factories/institutes. In addition, as per Section 183 if the institutes of a business group remain scattered in more than one sub-district/upazila or if the Owners work

Recommended corrective action:

It is recommended to facility management should form a Safety Committee as per Bangladesh local law.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

[Partial Follow up Audit was conducted on 16 July 2019:](#)

Corrective action taken

Based on management interview, worker interview and facility visit, it was noted that the facility management has Worker Safety Committee in the facility.

3. Description of non-compliance:

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

Half-yearly accidents reports did not submit to the inspector:

Based on it was noted that facility management did not submit half-yearly accidents reports to the inspector as per local legislation.

Local law and/or ETI requirement

Working condition are safe and hygienic 3.2:

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

2. management interview, worker interview and facility visit

2. management interview, worker interview and facility visit

3. management interview and injury register review

Bangladesh Labour rules 2015, Section 73(1):

73) **Register of the accidents and Report of half-yearly accidents:** 1) Authority of every institute shall preserve the record of each accident or mishap in the Register in accordance with Form-28. The authority would also accurately record the steps taken by the institute in relevant Register.

Recommended corrective action:

It is recommended that facility should submit half-yearly accidents report to the labor inspector.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on management interview and injury register review it was noted that facility management submitted half-yearly accidents reports to the inspector as per local legislation.

4. Description of non-compliance:

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

Interconnected addressable fire detection system missing:

Based on facility visit and management interview It was noted that facility did not install interconnected addressable fire detection system (e.g. smoke/heat detectors) with fire alarm control panel.

Note that facility installed manual fire call point throughout the facility.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh National Building Code 2006, Part 4, Section 4.4:

The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants.

Recommended corrective action:

It is recommended that facility should install interconnected addressable fire detection system (e.g. smoke/heat detectors) with fire alarm control panel covering all area.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

3.management
interview and
injury register
review

4. management
interview,
worker interview
and working
hour approval
review

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Partially Corrective action taken

Based on facility visit and management interview It was noted that facility's interconnected addressable fire detection system (e.g. smoke/heat detectors) with fire alarm control panel is work in progress.

Note that facility installed manual fire call point throughout the facility.

5. Description of non-compliance:

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

Required test is not conduct in drinking water test:

Based on from management interview and drinking water test report review, it was noted that the facility management conducted drinking water test report in 09 May 2019 from icddr,b but did not conduct Arsenic and Iron test as per local law.

Local law and/or ETI requirement
Working condition are safe and hygienic 3.2:

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

Bangladesh Labor Rules 2015, 50(5):

50. **Drinking water:**(5) In case of the underground water or supplied in other way or tube well water, the owner should procure and preserve the certificate from public health engineering department of the government or any other organization approved by the government whether the water is free from arsenic and germs and drinkable or not at least once a year if directed by the inspector.

Recommended corrective action:

It is recommended that the facility management should arsenic and iron from any approved government organization.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on from management interview and drinking water test report review, it was noted that the facility management conducted drinking water test report in 09 May 2019 from icddr, b and conducted Arsenic and Iron test on 18 June 2019 as per local law.

4.management interview, worker interview and working hour approval review

5. facility visit and management interview

5.facility visit and management interview

6. Description of non-compliance:

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

Facility did not have any permanent doctor and medical assistant:

Based on facility visit and management interview it was noted that the facility did not have any permanent doctor and medical assistant in the medical room as per rules. Besides there is no washing facility with the medical room

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labour law 2006, law-89(5)

89. First-aid appliances-(5) In every establishment wherein three hundred or more workers are employed, there shall be provided and maintained an ambulance room or dispensary of the prescribed size containing the prescribed equipment or similar facilities, in the charge of such medical and nursing staff as may be prescribed.

Bangladesh Labour Rules-2015, 77 (1):

77) Treatment Room/Unit: 1) At least one registered Physician shall be in each Treatment Unit of the institute or factory with the facility of dispensary. Additionally, at least one trained compounder or medical assistant, nurse and subordinate employee shall be employed for helping him/her, provided that at least two registered Physicians shall be recruited in case of an institute where more than three thousand employees/workers work and necessary number of medical assistant and nurse shall be recruited for helping the Doctors.

Recommended corrective action:

It is recommended that facility should recruit a permanent doctor and a medical assistant as per rule.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on facility visit and management interview it was noted that the facility has appointed permanent doctor and medical assistant in the medical room as per rules. Besides there is washing facility with the medical room.

6. management interview and drinking water test report review

6.management interview and drinking water test report review

7. Description of non-compliance:

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

Lack of medical equipment:

Based on facility visit and management interview it was noted that there was not required medical equipment in the medical room as per local legislation.

Besides, the facility did not have any washing facility with the medical room.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labor Rules, 2015, Rule 77 (5):

77) **Treatment Room/Unit:** 5) The medical room shall be used for primary aid and the comforts of patients. It must have at least following furniture and equipment's:

- a) 1 coated pot of hot and cold water;
- b) 1 table measuring 1.85 X 1.10 meters with smooth surface;
- c) Arrangement of disinfecting equipment's;
- d) 2 beds for lying, 2 stretchers and 1-wheel chair;
- e) 2 buckets or pots with closely-fitted lids;
- f) 1 kettle for boiling water and Spirit stove or any other appropriate arrangement;
- g) 12 wooden 'choti' of general type, measuring 91.44 cm X 10.16 cm X 0.63cm;
- h) 12 wooden 'choti' of general type, measuring 35.56 cm X 7.62 cm X 0.63 cm;
- i) 6 wooden 'choti' of general type, measuring 25.40 cm X 5.08 cm X 0.63 cm;
- j) 6 woolen blankets;
- k) 1 pair of artery forceps;
- l) 2 middle sized sponges;
- m) 6 hand towels;
- n) 4 trays;
- o) 4 carbolic soap;
- p) 2 glass pots;
- q) 2 thermometers and several hypodermic syringes;
- r) Gas measurement tools and tea spoons;
- s) Eyewash station;
- t) 1 bottle of 1:20 carbolic lotion;
- u) 3 chairs;
- v) 1 curtain;
- w) 1 electric hand torch;
- x) One primary aid box or almirah as per Section 76(1);
- y) Adequate supply of serum that is preventive of Tetanus and
- z) Instruments for stopping bleeding, for example- Turnicate.

Recommended corrective action:

It is recommended that facility should arrange medical equipment's as per legal legislation.

7. facility visit and management interview

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on facility visit and management interview it was noted that there was well medical equipment in the medical room as per local legislation.

Besides, the facility has washing facility with the medical room.

8. Description of non-compliance:

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

Childcare room found non-functional:

Based on from the facility visit and management interview It was noted that Childcare room found non-functional though currently 250-person female employees working in the facility.

Besides there is no designated child care attendee and washing facility with the child care room.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labour Law 2006. (94):

94. Rooms for children- (1) In every establishment, wherein more than forty women workers are ordinarily employed, there shall be provided and maintained a suitable room or rooms for the use of children under the age of six years of such women.

(2) Such rooms shall provide adequate accommodation, be adequately lighted and ventilated and maintained in a clean and sanitary condition and shall be under the charge of women trained or experienced in the care of children and infants.

(3) Such rooms shall be conveniently accessible to the mothers of the children accommodated therein and so far as is reasonably practicable it shall not be situated in close proximity to any part of the factory where obnoxious fumes, dust or odious are given off or in which excessively noisy processes are carried on.

(4) Such rooms shall be soundly constructed and all the walls and roof shall be of suitable heat resisting materials and shall be water proof.

(5) The height of such rooms shall not be less than 360 centimetre from the floor to the lowest part of the roof and there shall be not less than 600 centimetre of floor area for each child to be accommodated.

7.facility visit and management interview

8. facility visit and management interview

(6) Effective and suitable provisions part of such rooms for securing and ventilation by the circulation of fresh air.

(7) Such rooms shall be adequately furnished and equipped and in particular there shall be one suitable cot or cradle with the necessary bedding for each child, at least one chair or equivalent seating accommodation for the use of each mother while she is feeding or attending to her child and a sufficient supply of suitable toys for the older children.

(8) A suitable fenced and shady open-air play-ground shall be provided for the older children: Provided that the Chief Inspector may, by an order in writing, exempt any factory from compliance with this sub-section if he is satisfied that there is not sufficient space available for the provision of such a play-ground.

Recommended corrective action:

It is recommended that facility should keep child care room functional as per legal requirements.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

[Partial Follow up Audit was conducted on 16 July 2019:](#)

Corrective action taken

Based on from the facility visit and management interview It was noted that Childcare room found functional.

Besides there is designated child care attendee and washing facility with the child care room.

9. Description of non-compliance:

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

No canteen in the facility:

Based from documents review, management and employees interview it was noted that the there is no canteen in the facility where light food will be served.

Note that there are 438 employees working on the facility.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labour rules 2015, Section 87:

87) **Canteen:** 1) The Owner of the institute where more than 100 (one hundred) workers are employed shall arrange a canteen for the workers, facilitating adequate space for minimum 10% of total number of workers.

8. facility visit and management interview

9. facility visit and management interview

Recommended corrective action:

It is recommended that facility should keep functional canteen as per local legislation.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based from documents review, management and employees interview it was noted that the there is canteen in the facility where light food were served.

10. Description of non-compliance:

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

Facility did not take machine layout plan approval:

Based on building plan review and management interview it was noted through that facility did not taken machine layout plan approval of ground floor, 3rd floor, 4th floor, 5th floor, shed 1 and shed 2 from Chief Inspector of Factories.

Local law and/or ETI requirement
Working condition are safe and hygienic 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.

Bangladesh Labour Rules 2015, Rule-353 (4):

353. Approval of factory's layout plan and extension lay-out plan:-- (4) Without written permission of the inspector general, no change in any approved layout plan may be brought.

Recommended corrective action:

It is recommended that the facility should update their approved layout plan as it is showing in existing floor.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on building plan review and management interview it was noted through that facility taken machine layout plan approval of ground floor, 3rd floor, 4th floor, 5th floor, shed 1 and shed 2 from Chief Inspector of Factories.

9.facility visit and management interview

10. documents review, management and employees' interview

10.documents review, management and employees' interview

11. Description of non-compliance:

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

Approved construction building plan not include all sections:

Based from approved building plan review and management interview it was noted that shed 1 and shed 2 is not include in the approved construction building plan by concern authority.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Building Construction Act 1952, section (3):

Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alternation to any building, or excavate or re-excavate any tank within the area to which this Act applies; and such sanction shall be subject to such terms and conditions as the Authorized Officer may think fit to impose

Recommended corrective action:

It is recommended that facility management should arrange all building construction approval plan of the facility from concern authority.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based from approved building plan review and management interview it was noted that shed 1 and shed 2 is included in the approved construction building plan by concern authority.

12. Description of non-compliance:

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

Did not take testimonial of health assessment:

Based on the document review and management interview It was noted that facility did not take testimonial of health assessment and ability for 02 out of 02 electrician, 01 out of 01 generator operator and 01 out of 01 boiler operator. Moreover, facility yet not received physical fitness certificate (i.e. hearing test report) for 02 out of 02 electrician, 01 out of 01 generator operator and 01 out of 01 boiler operator.

11. Building plan review and management interview

11. Building plan review and management interview

12. approved building plan review and management interview

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labour Rules 2015, Rule 68(23, 27):

68) Hazardous activities:

23. Working in electrical wiring or electricity conductive lines;

27. Manufacturing environment where the sound level is more than 80 decibels;

Recommended corrective action:

It is recommended that the facility should done all the employees health check-up who are engaged in hazardous condition and take testimonial of health assessment and ability for them.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019

Corrective action taken

Based on the document review and management interview It was noted that facility took testimonial of health assessment and ability for 02 out of 02 electrician, 01 out of 01 generator operator and 01 out of 01 boiler operator. Moreover, facility received physical fitness certificate (i.e. hearing test report) for 02 out of 02 electrician, 01 out of 01 generator operator and 01 out of 01 boiler operator.

13. Description of non-compliance:

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

Designated apron did not provide to firefighter, first aider and rescuer:

Based on the facility visit and management interview, it was noted that facility did not provide designated apron to any firefighter, first aider and rescuer of the facility.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

12. approved building plan review and management interview

13. document review and management interview

Bangladesh Labour Rules 2015, Rule 55 (11):

55. Fire extinguisher and water supply:

The members of firefighting team, rescue team and first aid team must wear the prescribed uniform while conducting their respective operations and the dress code shall be as follows:

- a) Firefighting team: Yellow colored apron, in rear of which 'FIRE' shall be written in red color.
- b) Rescue team: Yellow colored apron, in rear of which 'RESCUE' shall be written in red color.
- c) First aid team: White colored apron, in rear of which 'FIRST AID' shall be written in red color.

Recommended corrective action:

It is recommended that facility should provide designated apron to firefighter, first aider and rescuer.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

[Partial Follow up Audit was conducted on 16 July 2019:](#)

[Corrective action taken](#)

[Based on the facility visit and management interview, it was noted that facility provided designated apron to any firefighter, first aider and rescuer of the facility.](#)

14. Description of non-compliance:

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

Facility did not install Public Address (PA) system:

Based on facility visit, fire license review and management interview It was noted that, facility did not install Public Address (PA) system in the finished goods area, dining area of 5th floor of main facility building of the facility.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh National Building Code 2006 section-D (18):

All buildings above 26 m in height shall have a command station on the entrance lobby with suitable public address (PA) system having communication to all floors as well as facilities to receive messages from all floors.

Recommended corrective action:

It is recommended that the facility should install Public Address (PA) system in the mentioned area.

13.document
review and
management
interview

14. facility visit and
management
interview

Action by: Mr. Momtaz Ahmed-Executive Director
Timeframe: 30 days
Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on facility visit, fire license review and management interview It was noted that, facility installed Public Address (PA) system in the finished goods area, dining area of 5th floor of main facility building of the facility.

15. Description of non-compliance:

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

Fire doors were not installed:

Based on facility visit it was noted that fire doors (03 out of 03) were not installed in Knitting section of ground floor of the facility.

Note that the facility has sliding door on the mentioned area.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh National Building Code 2006, Part:4, 3.7.6.

All exits access to corridor shall have a fire resistance of 1 hour or more.

Door assemblies opening on to the exit access corridors shall be fire doors having a fire resistance rating of at least of 20 minutes.

Facility Fire License condition 4:

Bangladesh National Building Code and Fire Prevention and Fire Control act 2003 should be followed for the management and control of all fire safety.

Recommended corrective action:

It is recommended that facility should install fire doors in required areas.

Action by: Mr. Momtaz Ahmed-Executive Director
Timeframe: 30 days
Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on facility visit it was noted that fire doors (03 out of 03) were installed in Knitting section of ground floor of the facility.

14.facility visit and management interview

15. facility visit, fire license review and management interview

15.facility visit, fire license review and management interview

16. Description of non-compliance:

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

Water pressure low at hose reel:

Based on facility visit It was noted that water pressure of randomly checked hose reel found low during the check of Hose Reel water pressure.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Facility Fire License condition 4:

Bangladesh National Building Code and Fire Prevention and Fire Control act 2003 should be followed for the management and control of all fire safety.

Recommended corrective action:

It is recommended that facility should ensure hose reel coverage with adequate water pressure in hose outlets.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

[Partial Follow up Audit was conducted on 16 July 2019:](#)

[Corrective action taken](#)

[Based on facility visit It was noted that water pressure of randomly checked hose reel found satisfactory during the check of Hose Reel water pressure.](#)

17. Description of non-compliance:

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

Eye wash station was not found:

Based on facility visit it was noted that eye wash station was not found at spot removing room at 1st floor of main facility building.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Recommended corrective action:

16. facility visit

16.facility visit

17. facility visit

It is recommended that the facility should maintain eye wash station for the mentioned area.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on facility visit it was noted that eye wash station was found at spot removing room at 1st floor of main facility building.

17.facility visit

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed:

	None observed
--	---------------

4: Child Labour Shall Not Be Used

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

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:

- The facility has established a practice that they will never employ and use any child labour.
- The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctors.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.
- There was no child or young employee observed in the facility.

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

Details:

- Recruitment policy.
- Policy on No-Child labour.
- Personal file including Birth certificate, primary/secondary education certificate, National ID card, etc. of sample employees.
- Age verification documents.

Any other comments: None

A: Legal age of employment:	18 year
B: Age of youngest worker found:	20 year
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)	0%

E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details: Not applicable
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Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: None	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None observed

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

5: Living Wages are Paid

[\(Click here to return to NC-table\)](#)

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

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:

- The facility is providing local legal minimum wage BDT 8000/month for all the employees.
- Time keeping system is manual.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Benefits of paid, maternity benefit to appropriate workers.
- All social insurance payments were passed on to the relevant authorities in a timely manner.
- All employees were paid on 07 working days of each month through Cash pay.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- There are some good practices by the facility; see below GE section
- Salary sheet and time card review April 2019 (Current paid month), May 2018 (off-peak), October 2018 (peak),
- [Salary sheet and time card review June 2019 \(Current paid month\) and May 2019 \(off-peak\)](#)

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

Details:

- Salary sheet review
- Overtime payment record review
- Payslip review
- Attendance register review
- Production record review
- Maintenance register review
- Maternity benefit register review
- Leave record review
- Final settlement record review

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Facility could not provide time card:

Based on salary sheet, time card review and management interview It was noted that auditor could not verify time card and salary sheet of the sampled employees as facility could not provide time card of 26 out of 26 sample employees for the month of May 2018 (off-peak month). Note that the facility has provide time card for rest of the sample month October 2018(Peak month) & April 2018 (Currently Paid month).

Local law and/or ETI requirement

Living Wages are Paid ETI base code 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.

Bangladesh labour law 2006, Section 100:

100. Daily working hours- No adult worker shall be required or allowed to work in an establishment for more than eight hours in any day. Provided that, subject to the provisions of section 108 an adult worker may work in an establishment for more than nine hours, but not exceeding ten hours in any day.

Recommended corrective action:

It is recommended that facility should ensure all required document during audit.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on salary sheet, time card review and management interview It was noted that auditor could verify time card and salary sheet of the sampled employees as facility provided time card of 10 out of 10 sample employees for the month of May 2019 (off-peak month).

Note that the facility has provide time card for rest of the sample month June 2019(Currently Paid month).

2. Description of non-compliance:

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

Did not provide annual leave benefit:

Objective evidence observed:

(where relevant please add photo numbers)

1. salary sheet, time card review and management interview

1.salary sheet, time card review and management interview

Based on document review and management representatives interview it was noted that facility management did not provide annual leave benefit as well the encashment of to the un availed annual leave to the employees as per rules.

Local law and/or ETI requirement

Living Wages are Paid ETI base code 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.

Bangladesh Labor Rule 2015, Rule-107 (2):

107) **Annual leave with wage facility:**2) Any worker can have cash money against the unspent Earned leave.

However, more than the half of the Earned leave cannot be cashed out at the end of

the year. This type of cashing can be done only once in a year.

Recommended corrective action:

It is recommended that facility should encash the un availed annual leave of the employees as per rule.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

[Partial Follow up Audit was conducted on 16 July 2019:](#)

Corrective action taken

Based on document review and management representatives interview it was noted that facility management provided annual leave benefit as well the encashment of the un availed annual leave to the employees as per rules.

3. Description of non-compliance:

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

Pay slip were not provided:

Based on employee interview & document review it was noted that pay slip were not provided to the knitting operator and knitting helper of knitting section of the facility.

Local law and/or ETI requirement

Living Wages are Paid ETI base code 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.

Bangladesh Labour Rules 2015, Rule 111:

111) **Wage and keeping records of it:** 1) Every factory or institute shall preserve the records of wage payment of all of workers in order of their sequence in the

2. document review and management representatives' interview

2.document review and management representatives' interview

3. employee interview & document review

registry, as per wage time, in compliance with Form-38. The person responsible for the payment of wages can preserve the record in computer for his/her convenience. However, the signature of the workers must be taken in the printed copy along with using revenue stamp while paying the wages.

2) If any worker wants to receive the wage amount through his/her bank account, the Owner can pay the wages through bank cheque and bank transfer. The Owner shall provide the wage slip to them. In this case, the authority shall provide necessary help and support to female workers about opening of bank accounts and running the same.

3) The Owner shall give Wage Slip to each worker at the time of paying wages as per Form-38, where payable amount of wages, overtime allowance, deduction (if any) and total payable amount of wages shall be mentioned.

4) Before employing a worker in any factory or institute, the Owner must declare his/her wage amount.

5) The workers who have completed one year of service/job consecutively must be given two festival bonuses in a year.

Recommended corrective action:

It is recommended that facility should provide pay slip to all employee.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

[Partial Follow up Audit was conducted on 16 July 2019:](#)

Corrective action taken

Based on employee interview & document review it was noted that pay slip were provided to the knitting operator and knitting helper of knitting section of the facility.

4. Description of non-compliance:

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

Stamp deduction shown in salary sheet:

Based on Salary sheet review; management interview and worker interview it was noted that facility management shows stamp deduction in salary sheet but did not attach stamp with the employee's salary sheet for the month of April 2019, October 2018(peak month) and May 2018 (off-peak month).

As per management comment it was the result of their lack of monitoring and they will monitor this from now on.

Local law and/or ETI requirement

Living Wages are Paid ETI base code 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.

Bangladesh stamp act, 1899:

Acknowledgement of a debt Ten taka exceed, in one thousand taka in amount or value, written or signed by or on behalf of. A devour in order to supply

3.employee
interview &
document
review

4. Salary sheet
review;
management
interview and
worker interview

evidence of such debt in any book (other than a banker passbook) or on a separate piece of paper where such book or paper is left in the creditor's possession:

Provided that such acknowledgement does not contain any promise to pay the debt or any stipulation to pay interest or to deliver any goods or other property.

Bangladesh Labour Rules 2015, Rule 111(1):

111) **Wage and keeping records of it:** 1) Every factory or institute shall preserve the records of wage payment of all of workers in order of their sequence in the registry, as per wage time, in compliance with Form-38. The person responsible for the payment of wages can preserve the record in computer for his/her convenience. However, the signature of the workers must be taken in the printed copy along with using revenue stamp while paying the wages.

Recommended corrective action:

It is recommended that facility should attach stamp in the employee's salary sheet.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

[Partial Follow up Audit was conducted on 16 July 2019:](#)

Corrective action taken

Based on Salary sheet review; management interview and worker interview it was noted that facility management shows stamp deduction in salary sheet and facility provided attach stamp with the employee's pay slip for the month of June 2019 (current paid month) and May 2019 (off-peak month).

4.Salary sheet review;
management interview and worker interview

Observation:

Description of observation: None observed

Local law or ETI requirement: Not applicable

Comments: None

Objective evidence observed:

None observed

Good Examples observed:

Description of Good Example (GE):

- Facility management provides attendance bonus to all employees as per company policy.

Objective Evidence Observed:

Documents review, management and employees' interview

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: 08 hours per day 48 hours per week 208 hours per month	08 hours per day 48 hours per week 208 hours per month (For all sample months)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 04 hours per day 24 hours per week 104 hours per month (With legal waiver of 02 hours per day)	20 hour per week April 2019 (Currently Paid Month), 30 hour per week 138 hour per month October 2018 (peak month) May 2018 (Off-Peak month) Salary sheet and job card could not be verified as the facility management did not provide it. 48 hours/month in June 2019 (Current month) 56 hours/month in May 2018 (Off peak month)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)
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: BDT 8000.00 per month	BDT 8000.00 in the month of April 2019 (From	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

		sample employees)	(Not mandatory by Local Law)
D: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: Per hour 200% of basic hourly rate	Per hour 200% of basic hourly rate	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (Not mandatory by Local Law)

Wages analysis: (Click here to return to Key Information)																																																																
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																															
If No , why not?	Not applicable																																																															
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)	26 samples from April 2019 (Currently Paid Month), 26 samples from October 2018 (peak month) 26 samples from May 2018 (off-peak month) (could not verified) 10 samples from June 2019 (Currently Paid Month), 10 samples from May 2019 (Off peak month)																																																															
C: Are there different legal minimum wage grades? If Yes , please specify all.	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> <div> If Yes, please give details: The Government announced pay structure on 24th January 2019 for the workers of the Garments Industries. </div> <table border="1"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>10938</td> <td>5469</td> <td>900</td> <td>600</td> <td>350</td> <td>18257</td> </tr> <tr> <td>Grade 2</td> <td>9044</td> <td>5422</td> <td>900</td> <td>600</td> <td>350</td> <td>15416</td> </tr> <tr> <td>Grade 3</td> <td>5330</td> <td>2665</td> <td>900</td> <td>600</td> <td>350</td> <td>9845</td> </tr> <tr> <td>Grade 4</td> <td>4998</td> <td>2499</td> <td>900</td> <td>600</td> <td>350</td> <td>9347</td> </tr> <tr> <td>Grade 5</td> <td>4683</td> <td>2342</td> <td>900</td> <td>600</td> <td>350</td> <td>8875</td> </tr> <tr> <td>Grade 6</td> <td>4380</td> <td>2190</td> <td>900</td> <td>600</td> <td>350</td> <td>8420</td> </tr> <tr> <td>Grade 7</td> <td>4100</td> <td>2050</td> <td>900</td> <td>600</td> <td>350</td> <td>8000</td> </tr> <tr> <td>Apprentice</td> <td>2750</td> <td>1375</td> <td>900</td> <td>600</td> <td>350</td> <td>5975</td> </tr> </tbody> </table>	Grades	Basic wage (BDT)	House rent (50% basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)	Grade 1	10938	5469	900	600	350	18257	Grade 2	9044	5422	900	600	350	15416	Grade 3	5330	2665	900	600	350	9845	Grade 4	4998	2499	900	600	350	9347	Grade 5	4683	2342	900	600	350	8875	Grade 6	4380	2190	900	600	350	8420	Grade 7	4100	2050	900	600	350	8000	Apprentice	2750	1375	900	600	350	5975
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Grade 7	4100	2050	900	600	350	8000																																																										
Apprentice	2750	1375	900	600	350	5975																																																										
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </div> <div> If No, please give details: </div>																																																															

<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i></p> <p>Lowest gross salary is 8000.00 BDT In the Month of April 2019. This is minimum legal wage.</p>	
<p>F: Please indicate the breakdown of workforce per earnings:</p>		<p>___ % of workforce earning under min wage ___ 20% of workforce earning min wage ___ 80% of workforce earning above min wage</p>	
<p>F: Bonus scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i> Facility management provides attendance bonus as per company policy.</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>As per section 125 of the Bangladesh Labour Law, 2006, facility may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. As per Bangladesh Stamp Act 1899 (Amendment 2010) factory may deduct BDT 10 for Government Revenue Stamp.</p>		
<p>I: Have these deductions been made? Please list all deductions that have/have not been made.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Please list all deductions that have been made.</p>	<p>Please describe: Deduction is only made for un-authorized absent and stamp deduction which is done as per law.</p>
		<p>Please list all deductions that have not been made.</p>	<p>Deduction is only made for un-authorized absent and stamp deduction.</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <div style="margin-left: 150px;"> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence: </div>		
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility shows all real records which reflect all scenarios.		

after work but not paid for their time)	
<p>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></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please specify amount/time:</p> <p>Facility did not define living wages as it is not required by law. However, facility is providing the minimum wage as per published Government Minimum Wages on 24th January 2019.</p>
<p>If yes, what was the calculation method used.</p>	<p><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: Not applicable</p>
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There are no periodic reviews of wages.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>All employees are paid within 07 working day of the following month.</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through payroll records review and employee's interviews' interview, it was confirmed that equal rates are being paid for equal work.</p>
<p>Q: How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other If other, please explain: None</p>

6: Working Hours are not Excessive

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

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:

- Through employees' interview, overtime is voluntary.
- Time keeping system is Manual.
- All overtime is compensated at a premium rate for all employees.
- Facility remains closed on Friday.
- Salary sheet and time card review from April 2019 (Current paid month), May 2018 (off-peak), October 2018 (peak).
- Salary sheet and time card review from June 2019 (Current paid month), May 2019 (off-peak),

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

Details:

- Employees' interviews

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

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Working hour approval not taken:

Based on management interview, worker interview and working hour approval review, it was noted that the facility management did not take working hour approval from labor inspector for Knitting Section where 19 employees worked.

Note that the facility management has taken working hour approval for Cutting, Sewing, Finishing and Packing section.

Local law and/or ETI requirement

Working condition are safe and hygienic 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.

Bangladesh Labour rules 2015, Section 105:

105) **Notice of the working time of adult workers:** 1) The working hours of adult workers have to be approved by the Inspector in accordance with Form-37, 37(a) or 37 (b) in respective cases.

2) After receiving approval of the Inspector on the notice mentioned in Sub-section (1), the copy of the approved notice must be hung in an easily noticeable place so that all workers can be informed about it.

3) The approved notice has to be preserved and the same should be kept ready for inspection and audit purpose.

Recommended corrective action:

It is recommended that the facility should take working hour approval from the proper authority.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Objective evidence observed:

(where relevant please add photo numbers)

1. salary sheet, time card review and management interview

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on management interview, worker interview and working hour approval review, it was noted that the facility management have taken working hour approval from labor inspector for Knitting Section where 20 employees worked.

2. Description of non-compliance:

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

Inconsistency found in time card and salary sheet:

Based on salary sheet, time card review and management interview It was noted that auditor found inconsistency in time card and salary sheet of the employee e.g. according to time card of 'X' employee for the month of April 2019(Currently Paid month) and October 2018(peak month) he/she has done Over Time (OT) of 98 hours whereas salary sheet showing payment of 123 hours and facility representative could not provide any document supporting to that 2 hours of OT. Note that the facility does not provide time card of month of May 2018 (off-peak month) that's why auditor could not verify the overtime calculation.

Local law and/or ETI requirement

Working Hours are not Excessive and ETI base code 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.

Bangladesh labour law 2006, Section 108:

108. Extra allowance for overtime. - (1) Where a worker works in an establishment for more than the prescribed hours in any day or in any week under this Code, he shall, in respect of overtime work, be entitled to allowance at the rate of twice of the average of his basic wages, dearness allowance and ad-hoc or interim wages, if any.

(2) Where any worker in an establishment is paid on a piece rate basis, the employer, in consultation with the representatives of the workers, may, for the purposes of this section fix time rates as nearly as possible equivalent to the average rates of earnings of those workers, and the rates so fixed shall be deemed to be the ordinary rates of wages of those workers.

(3) The Government: may prescribe the registers to be maintained in an establishment for the purpose of securing compliance with the provisions of this section.

Recommended corrective action:

It is recommended that facility should maintain consistent documents (time card and wage sheet).

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

Partial Follow up Audit was conducted on 16 July 2019:

1.salary sheet, time card review and management interview

2. salary sheet, time card review and management interview

Corrective action taken

Based on salary sheet, time card review and management interview It was noted that auditor found consistency in time card and salary sheet of the employees for the month of June 2019 (Currently Paid month) and May 2019 (off peak month).

3. Description of non-compliance:

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

Facility could not provide time card:

Based on salary sheet, time card review and management interview it was noted that auditor could not verify time card and salary sheet of the sampled employees as facility could not provide time card of 26 out of 26 sample employees for the month of May 2018 (off-peak month).

Note that there is no inconsistency found in October 2018 (peak month) and the facility does not provide time card of month of May 2018 (off-peak month) that's why auditor could not verify the overtime calculation.

Local law and/or ETI requirement

Working Hours are not Excessive and ETI base code 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.

Bangladesh labour law 2006, Section 108:

108. Extra allowance for overtime. - (1) Where a worker works in an establishment for more than the prescribed hours in any day or in any week under this Code, he shall, in respect of overtime work, be entitled to allowance at the rate of twice of the average of his basic wages, dearness allowance and ad-hoc or interim wages, if any.

(2) Where any worker in an establishment is paid on a piece rate basis, the employer, in consultation with the representatives of the workers, may, for the purposes of this section fix time rates as nearly as possible equivalent to the average rates of earnings of those workers, and the rates so fixed shall be deemed to be the ordinary rates of wages of those workers.

(3) The Government: may prescribe the registers to be maintained in an establishment for the purpose of securing compliance with the provisions of this section.

Recommended corrective action:

It is recommended that facility should ensure all required document during audit.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

2.salary sheet,
time card
review and
management
interview

3. salary sheet,
time card
review,
employee and
management
interview

3.salary sheet,
time card
review,

Based on salary sheet, time card review and management interview it was noted that auditor verified time card and salary sheet of the sampled employees for the month of June 2019 (current paid month) and May 2019 (off-peak month).

4. Description of non-compliance:

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

Violation in daily and weekly working hours were observed:

Based on salary sheet, time card review, employee and management interview it was noted that violation in daily and weekly working hours were observed in the sample months.

a) Violation in daily working hours were as follow:

- In October 2018 (Peak month) 12 out of 26 sample employees worked from 13 hours (8 hours regular + 5 hours OT) to 22 hours (8 hours regular + 14 hours OT) in a day

b) Violation in weekly working hours were as follows

- In October 2018 (Random month) 02 out of 26 sample employees worked for 75 hours (48+27) to 78 hours (48+30) in a week.

Note that the facility does not provide time card of month of May 2018 (off-peak month) that's why auditor could not verify the overtime calculation.

Local law and/or ETI requirement

Working Hours are not Excessive and ETI base code 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.

Bangladesh Labour Law 2006, Section 100:

100. Daily working hours- No adult worker shall be required or allowed to work in an establishment for more than eight hours in any day. Provided that, subject to the provisions of section 108 an adult worker may work in an establishment for more than nine hours, but not exceeding ten hours in any day.

Bangladesh Labour Law 2006 section 102:

102. Weekly hours. - (1) No adult worker shall be required or allowed to work in an establishment for more than forty-eight hours in any week.

(2) Subject to the provisions of section 108, an adult worker may work for more than forty-eight hours in a week:

Provided that the total hours of work of an adult worker shall not exceed sixty hours in any week and on the average fifty-six hours per week in any year. Provided further that if in the opinion of the Government, the public interest or the interest of economic development so requires, it may from time to time, by notification in the official Gazette, extend the operation of any such order for

employee and management interview

4. time card, salary sheet review, employee and management interview

such further periods, not exceeding six months at any one time; as may be specified in the notification.

Recommended corrective action:

It is recommended that facility should maintain working hour within the legal limits.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

Partial Follow up Audit was conducted on 16 July 2019

Corrective action taken

Based on salary sheet, time card review, employee and management interview it was noted that no violation in daily and weekly working hours were observed in the sample months. June 2019 (current paid month) and May 2019 (off peak month).

4.time card,
salary sheet
review,
employee and
management
interview

5. Description of non-compliance:

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

Consecutive working days found:

Based on time card, salary sheet review, employee and management interview It was noted that-

a) In the month of October 2018 (Peak month) facility was open on 05 October 2018(Weekly Holiday). As a result, 02 out of 26 sampled employees worked for 11 days consecutively and 26 October 2018(Weekly Holiday). As a result, 02 out of 26 sampled employees worked for 12 days consecutively.

Note that Facility could not provide the adjusted this working day with the weekly holidays.

b) In the month of April 2019 (Currently Paid month month) facility was open on April 2019 (Currently Paid month month) (Weekly Holiday). As a result, 02 out of 26 sampled employees worked for 11 days consecutively. As a result, 02 out of 26 sampled employees worked for 12 days consecutively.

Note that Facility could not provide the adjusted this working day with the weekly holidays.

5. time card, salary
sheet review,
employee and
management
interview

Local law and/or ETI requirement

Working Hours are not Excessive and ETI base code 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.

Bangladesh Labour Law 2006, Section: 104:

104. Compensatory weekly holiday- Where, as a result of the passing of an order or the making of a rule the provisions of this Code exempting an establishment or the workers therein from the provisions of section 103, a worker is deprived of

any of the weekly holidays provided for in that section, he shall be allowed as soon as circumstances permit, compensatory holidays of equal number to the holidays so deprived of.

Recommended corrective action:

It is recommended that the facility should ensure weekly holidays complying with the legal requirement.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 60 days

Verification Method: Follow-up

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

It was noted through time card, salary sheet review, employee and management interview that consecutive days found in month of May 2019 which was adjusted with the month of June 2019 for (Eid-ul-Fitre) as per requirement.

5.time card,
salary sheet
review,
employee and
management
interview

Observation:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)

None observed

Good Examples observed:

Description of Good Example (GE): None observed

Objective evidence observed:

None observed

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: manual		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	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	If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> 0 hrs
		If "Other", Please define:	
		Not applicable	
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	If yes, please detail hours, %, types of workers affected and frequency Please give details: Not applicable	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	Please select all applicable: <input type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No If 'No', please explain: Consecutive working days found: Based on time card, salary sheet review, employee and management interview It was noted that- a) In the month of October 2018 (Peak month) facility was open on 05 October 2018(Weekly Holiday). As a result, 02 out of 26 sampled employees worked for 11		Is this allowed by local law? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

	<p>days consecutively and 26 October 2018(Weekly Holiday). As a result, 02 out of 26 sampled employees worked for 12 days consecutively.</p> <p>Note that Facility could not provide the adjusted this working day with the weekly holidays.</p> <p>b) In the month of April 2019 (Currently Paid month month) facility was open on April 2019 (Currently Paid month month) (Weekly Holiday). As a result, 02 out of 26 sampled employees worked for 11 days consecutively. As a result, 02 out of 26 sampled employees worked for 12 days consecutively.</p> <p>Note that Facility could not provide the adjusted this working day with the weekly holidays.</p> <p>Please select all applicable:</p> <p><input checked="" type="checkbox"/> 1 in 7 days</p> <p><input type="checkbox"/> 2 in 14 days</p> <p><input type="checkbox"/> No</p> <p>If 'No', please explain:</p>	<p>Is this allowed by local law?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
	<p>Maximum number of days worked without a day off (in sample):</p> <p>12 Days In month of April 2019 (Currently Paid Month) and October 2018 (Peak month)</p> <p>6 days</p>	
Standard/Contracted Hours worked		
<p>G: Were standard working hours over 48 hours per week found?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>If yes, % of workers & frequency:</p> <p>Not applicable</p>
<p>H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p>If yes, please give details:</p> <p>As per Circular from Bangladesh Labour and Employment Ministry; Facility can do 60 hours overtime in a Week with the consent of employees which is valid till 18 October 2019.</p>

Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	<p>20 hour per week April 2019 (Currently Paid Month),</p> <p>30 hour per week 138 hour per month October 2018 (peak month)</p> <p>May 2018 (Off-Peak month) Salary sheet and job card could not be verified as the facility management did not provide it.</p> <p>48 hour per month June 2019 (Currently Paid Month),</p> <p>56 hour per month May 2019 (Off peak month)</p>
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:	<p>___5___%</p>	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<p>Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</p> <p>Based on employees' interviews, employee can do overtime as per their willingness and it's not mandatory. Facility management never forces employees to do overtime.</p>
Overtime Premiums		
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	<p>Please give details of normal day overtime premium as a % of standard wages:</p> <p>200% of Standard wages.</p>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>If yes, please describe % of workers & frequency:</p> <p>Overtime payments for employees are as per legal requirement</p>

<p>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.</p>	<div data-bbox="416 219 1485 394"> <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 </div> <div data-bbox="416 394 1485 521"> Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other </div> <div data-bbox="416 521 1485 701"> Not applicable </div>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<div data-bbox="416 712 1485 898"> <input type="checkbox"/> Overtime is voluntary <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) </div> <div data-bbox="416 898 1485 994"> Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other: </div> <div data-bbox="416 994 1485 1070"> Not applicable </div>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<div data-bbox="416 1081 1485 1189"> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details: Not Applicable </div>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<div data-bbox="416 1373 1485 1447"> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </div>

7: No Discrimination is Practiced

[\(Click here to return to NC-table\)](#)

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:

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

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

Details:

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

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: ____95% Female____5%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: 0 No such women is present in this facility.
C: Is there any evidence of discrimination based on race, caste,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation

national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> access to training <input type="checkbox"/> promotion <input type="checkbox"/> termination or retirement No such evidence found.
---	--

Professional Development	
A: What type of training and development are available for workers?	Please give details Orientation Training First Aid Training Health & Safety training Electrical Safety Training

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

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

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Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

8: Regular Employment Is Provided

[\(Click here to return to NC-table\)](#)

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

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 employees were recruited by the factory directly.
- No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All employees are getting signed labour contract and ID card during their recruitment.
- Facility maintains service books for all employees.

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

Details:

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

Any other comments: None

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None 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?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions 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 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 – please give details Not applicable
D: If any checked, give details:	Not applicable

Migrant Workers: <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 and where they do not intend to remain permanently 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:	There are no migrant workers in the facility.	
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Not Applicable. Total number of (outside of local country) recruitment agencies used: Not Applicable.	
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 Please describe finding:	Observations: Not applicable
D: Are any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes number and example of roles: Not Applicable.	

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input checked="" 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 – please give details Not applicable, no fees required
C: If any checked, give details:	Not applicable, no fees required

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):	There is no agency worker in the facility. And names if available: Not Applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No

	Please give details: Not applicable, site does not use agencies.
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 Please give details: Not applicable, site does not use agencies.

Agency Workers (if applicable) <i>(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.)</i>	
A: Number of agencies used (average):	There is no agency worker in the facility. And names if available: Not Applicable
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Not applicable, site does not use agencies.
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 Please give details: Not applicable, site does not use agencies.

8A: Sub-Contracting and Homeworking:

8A: Sub-Contracting and Homeworking

[\(Click here to return to NC-table\)](#)

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

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:

- No Sub-contracting and Home-working was used by this facility.

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

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

Not applicable

Details:

- Shipment record
- Goods in and out register
- Production record
- Goods in and out gate pass / records

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

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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

D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , 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 If Yes , summarise details:		
B: Number of homeworkers	Male:	Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		
D: If through agents, number of agents			
E: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
F: How does site ensure worker hours and pay meet local laws for homeworkers?			
G: What processes are carried out by homeworkers?			
H: Do any contracts exist for homeworkers	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
I: 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

[\(Click here to return to NC-table\)](#)

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 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Facility has an open channel for reporting any violations of labour standard which is posted in the notice board. The facility has a designated channel to conduct grievance handling procedure.
B: If Yes , are workers aware of these channels and have access? Please give details.	All the workers are aware of these channels and have full access to these channels. Facility also has a grievance handling procedure posted with every complaint box.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Facility has posted hotline & provided grievance box in wash room.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other Details: Employee can place their grievance verbally or in written. Employee can also keep their identity confidential if required
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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. help lines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 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:

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Through the factory management and employees' interviews, it was noted that no physical abuse happened in the factory.
- There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

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

Details:

- Anti-Harassment policy
- Grievance box open register
- Orientation training record

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)

None observed

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

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:

- Only employees with a legal right to work shall be employed or used by the factory.
- The youngest age was 20 years old.

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

Details:

- Factory recruitment policy.
- Employees personal file.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: None observed

Local law and/or ETI requirement: Not applicable

Recommended corrective action: None

Objective evidence observed:

(where relevant please add photo numbers)

None observed

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

Good examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: None observed

10. Other issue areas 10B2: Environment 2-Pillar

[\(Click here to return to NC-table\)](#)

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.

- The facility prepared an environmental policy and procedure.
- The facility disposes all solid waste in a segregated area with proper level and identification.
- The facility also provides awareness training to all related personnel.
- Solid waste has been handover to licensee vendor as per local legislation who recycled that wastage.
- Air emission and Noise level test was conducted by the facility and all the parameter of those report was found within the acceptable limit.

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

Details:

- Environment policy
- Wastage management policy.
- Air emission and noise level test reports

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Air emission and Noise level assessment test missing:

Based on management interview and documents review it was noted through that the facility did not conduct any Air emission and Noise level assessment test of the facility from approved laboratory.

Local law and/or ETI requirement

Environment 2-pillar: ETI base code 10B2.1:

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

Bangladesh Environmental Conservation Rules 1997; Rule 12:

Objective evidence observed:

(where relevant please add photo numbers)

1. Document review and management interview

12. Determination of environmental standards. – For carrying out the purposes of clause (a) of sub-section (2) of section 20, the standards for air, water, sound, odor and other components of the environment shall be determined in accordance with the standards specified in Schedules - 2, 3, 4, 5, 6,7 and 8.

Recommended corrective action:

It is recommended that the facility should conduct any Air emission and Noise level assessment test for enter facility from approved laboratory.

Action by: Mr. Momtaz Ahmed-Executive Director

Timeframe: 30 days

Verification Method: Desktop

Partial Follow up Audit was conducted on 16 July 2019:

Corrective action taken

Based on management interview and documents review it was noted through that the facility conducted Air emission and Noise level assessment test for enter facility from approved laboratory.

1.Document review and management interview

Observation:

Description of observation: None observed

Local law or ETI/additional elements requirement: Not applicable

Comments: None

Objective evidence observed:
None observed

Good examples observed:

Description of Good Example (GE): None observed

Objective Evidence Observed:
None observed

Other Findings Outside the Scope of the Code

None observed

Community Benefits

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

None observed

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

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.

ETI Code / Additional Elements

Customer's Supplier Code equivalent

0.A. Universal Rights covering UNGP

0.A. Universal Rights covering UNGP

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.

0.B. Management Systems & Code Implementation

0.B. Management Systems & Code Implementation

0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
ETI 1. Forced Labour	ETI 1. Forced Labour
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	

<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.</p>	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
ETI 5. Living wages are paid	ETI 5. Living wages are paid
<p>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.</p> <p>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.</p> <p>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.</p>	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
<p>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.</p> <p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p>	

<p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> – 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. <p>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.</p>	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
<p>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.</p>	
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>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</p>	

<p>provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>Additional Elements: Responsible Recruitment</p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
<p>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.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
<p>Additional Elements</p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
10. Other issue areas 10B2: Environment 2-Pillar	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
<p>B.4. Compliance Requirements</p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>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.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>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).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p>B4. Guidance for Observations</p> <p>10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.</p> <p>10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
Business Practices Section	

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.










Photo Form










Non-compliance Photos:










	Nil	Nil
NC photo-1: Low Pressure of fire hose reel.	Nil	Nil











General Site Tour Photos:

		
Facility gate	Facility name	Facility building
		
Security Check Post	Stairs	Vacant roof top

		
Evacuation plan	Yarn store	Accessories store
		
Knitting section	Finished Goods Warehouse	Assembly point
		
Cutting Section	Sewing section	Iron section






		
Finishing Section	Spot removing room	Sample Section
		
Fire door	Fire Extinguisher	Fire Alarm
		
Fire equipment's	Fire hose reel	Smoke Detector

		
Public Address system	EXIT Sign	ID Card
		
Primary Aisles	No Smoking Sign	First Aid Box
		
Complaint box	Toilet Area	Dining

		
Medical room	Drinking Water Station	Child Care
		
Exhaust fan	Electricity Distribution Board	PPE Used
		
Transformer room	Compressor	Boiler
	Nil	Nil
Generator	Nil	Nil

Partial follow up audit conducted on 16 July 2019.

Corrective action taken Photo:







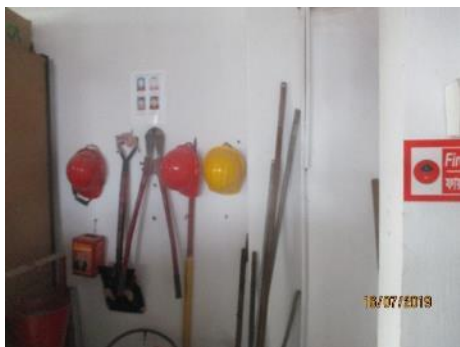





		
Wheel chair in medical room	Childcare room found non-functional	Canteen found in the facility
		Nil
Hose Reel water pressure found satisfactory	Eye wash station was not found at spot removing room	Nil

Partial follow up audit conducted on 16 July 2019.

General Site Tour Photos:

		
Facility gate	Facility name	Facility building

		
Security Check Post	Stairs	Vacant roof top
		
Evacuation plan	Yarn store	Accessories store
		
Knitting section	Finished Goods Warehouse	Assembly point
		
Cutting Section	Sewing section	Iron section

		
Finishing Section	Spot removing room	Eye Wash Station
		
Fire door	Fire Extinguisher	Fire Alarm
		
Fire equipment's	Fire hose reel	Smoke Detector
		
Public Address system	EXIT Sign	ID Card

		
Primary Aisles	First Aid Box	Canteen
		
Complaint box	Toilet Area	Dining
		
Medical room	Drinking Water Station	Child Care
		
Exhaust fan	Electricity Distribution Board	PPE Used

		
Fire Fighter	Fire Rescuer	First Aider
		
Transformer room	Compressor	Boiler
	Nil	Nil
Generator	Nil	Nil

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End of report



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

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