



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details

Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 159344436	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 163115278
Business name (Company name):	Murad Apparels Limited (মুরাদ এ্যাপারেলস লিমিটেড।)		
Site name:	Murad Apparels Limited (মুরাদ এ্যাপারেলস লিমিটেড।)		
Site address: <i>(Please include full address)</i>	South Gouripur, Ashulia, Savar, Dhaka-1341. (সাউথ গৌড়ীপুর, আশুলিয়া, সাভার, ঢাকা-১৩৪১)	Country:	Bangladesh
Site contact and job title:	Md. Amran Hossain, Manager (HR & Compliance)		
Site phone:	+8801720676892, +8801681518854	Site e-mail:	amran.murad@gmail.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	March 25, 2020		

Audit Company Name & Logo:

Eurocert Inspection Services Pvt. Ltd.



Report Owner (payer):

(If paid for by the customer of the site please remove for Sedex upload)

Murad Apparels Limited

Audit Conducted By

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: A.S.M Junnun, Senior Social Auditor

Team auditor: Samima Sultana, Senior Auditor, SM. Ferdous Islam, Social Auditor & Md. Imrul Kabir, Social Auditor

Interviewers: A.S.M Junnun, Senior Social Auditor and Samima Sultana, Senior Auditor.

Report writer: A.S.M Junnun, Senior Social Auditor

Report reviewer: Md. Anower Khaled, Senior Auditor

Date of declaration: March 25, 2020.

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	No observation & good example were found in this section.
0B Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	5	0	0	NC: 1. The eye wash point was not found proper functional into the finishing section located at the ground floor of the building no # 1. 2. The insufficient first aid kits were found into the first aid box into the production floor. 3. Aisles marking was found erased into the finishing section located into the ground floor of the production building no # 1. 4. Emergency floor evacuation plan was found miss match with the actual lay out of the

									sewing section located at the 1st floor of the production building no # 1. 5. Noted during factory visit that - (a) Approximately 30% sewing machines' eye guard, needle guard were found displaced. (b) 3 out of 12 button hole machine pulley covers were found missing into the finishing section located at the ground floor of the production building no. # 1. (c) Snap button machine operators were not used eye protector. (d) 01 out of 01 spot lifter did not use respiratory mask & hand gloves during spot lifting at the finishing section.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	1	GE: 1. The factory provides attendance bonus to the workers.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No non conformity, observation & good

									example were found in this section.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	No non conformity, observation & good example were found in this section.
10B2	<u>Environment 2-Pillar</u>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1	0	0	NC: 1. The wastage area was not found segregated as per the types and hazards.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not Applicable as this a 2-pillar audit.
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not Applicable as this a 2-pillar audit.

General observations and summary of the site:

Site Summary:

The site was established in 2014 and produced manufactured by all kinds of Woven items. The business is owned by MD. Abdul Hannan, who had a Garments Factory in Bangladesh. The factory has been managed by Md. Amran Hossain, Manager (HR & Compliance) since 2014. It consists of four (04) buildings & one (01) shed, office building and warehouse on site. The 2-pillar audit was performed over 1 day by 4 auditors and included interviews and records inspection of 52 workers. Workers interviewed were including both male and female. All workers were favourable towards the company. They enjoyed the work and stated it was a friendly environment. Payment system was always accurate and paid on time. Also, they stated that they felt comfortable in approaching with any concerns they had. There were several non-compliances found in the audit as per the table, specific examples include in Safety and Hygienic Conditions as well as in Environment 2 Pillar.

**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:	Murad Apparels Limited
B: Site name:	Murad Apparels Limited
C: GPS location: (if available)	<p>GPS Address: South Gouripur, Ashulia, Savar, Dhaka- 1341. Latitude: 23.884003 (23°53'14.8"N) Longitude: 90.322470 (90°19'32.0"E)</p>
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 No: 0020228 issued by Ashulia Union Porishad, Savar, Dhaka, Bangladesh which is valid till June 30, 2020.</p> <p>Factory License No: 17270/Dhaka issued by Bangladesh Government, which is valid till June 30, 2020.</p> <p>Fire License No: DD/Dhaka/24721/2014, issued by Bangladesh Fire Service & Civil Defence Authority which is valid till June 30, 2020.</p> <p>TIN Certificate Number: 137281627193</p> <p>Certificate of Incorporation No: C-29682(970)/95</p>
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	<p>Product: Final product is all types of Woven Garments. Activities: Garments Manufacture (All types of Woven Garments) – Cutting, Sewing, Finishing.</p>
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Murad Apparels Limited is 100% Export Oriented Woven Garments factory. The factory is located South Gouripur, Ashulia, Savar, Dhaka- 1341. The factory has started its operation from June, 2014. The factory comprises of total 200,000.00 square feet land area and 96,259.00 square feet for production area. Total production capacity is 500,000 pieces per month. Currently 1210 employees are working in this facility including 45 Non-Production Employees. Among them 424 are male and 786 are female. All employees are Bangladeshi by birth. In general, the employees of garments division work for 6 days in a week (Saturday to Thursday). Friday is weekly holiday. The normal working hour is from 08:00 am to 05:00 pm including one hour lunch break from 01:00 pm to 02:00 pm.</p> <p>Security Shift: The security guards are performing their job in three shifts. There are three shifts as follows:</p> <p>Shift A (The security guard) starts from 6.00 am to 2.00 pm with one-hour break.</p> <p>Shift B (The security guard) starts from 2.00 pm to 10.00 pm with one-hour break.</p> <p>Shift C (The security guard) starts from 10.00 pm to 06.00 am with one-hour break.</p> <p>No dormitory was provided by the factory. Employees and workers' wages are calculated and paid on monthly rated basis.</p>

Details floor Descriptions are given below:
Factory has four (04) buildings and one (01) shed exist which are given below.

Building no (01) (3 storied buildings)	Descriptions	Remark, If any
Ground floor	Accessories store, Bonded warehouse, packing area, finishing section, Cutting section, Boiler room & C-TPAT area.	N/A
1st floor	Sewing Section, Sample section & Office area.	N/A
2 nd floor	Murad Fashion Limited	N/A
Roof Top	100% vacant	N/A

Building no (02) (3 storied building)	Descriptions	Remark, If any
Ground floor	Fabric Store	N/A
1st floor	Fabric Store	N/A
2 nd floor	Finished Cartoon Area	N/A
Roof Top	100% vacant	N/A

Utility Building (1)	Descriptions	Remark, If any
N/A	Generator room.	N/A

Utility Building (2)	Descriptions	Remark, If any
N/A	Fire pump house.	N/A

Utility Building (3)	Descriptions	Remark, If any
N/A	Security room	N/A

Shed no (01) (2 storied)	Descriptions	Remark, If any
Ground floor	Doctors room, Child care room, Conference room, Office room, Prayer room	N/A
1st Floor	Dining room, Workers Dining & Canteen	N/A

	<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: There are no visible cracks or damages found in the factory building. Moreover, as per provided engineer evaluation plan report, the factory building found structurally safe.</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: The factory has already evaluated their site by the Accord.</p>
<p>G: Site function:</p>	<p><input type="checkbox"/> Agent</p> <p><input checked="" 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>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Same all around the year reported by factory management.</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Main products manufactured by the factory: All kinds of woven garments.</p> <p>Facility's production capacity: 5,00,000 pieces/monthly</p> <p>Main production processes: Cutting, Sewing and Finishing.</p> <p>Main equipment used: Plain Machine, Kanshi Machine, Two Needle Machine, Over Lock Machine, Feed of the Arm, Button Hole Stitch, Button Lock Stitch, Bar tack Machine, Blind Stitch Machine, Snap Button Machine, Eyelet Hole Machine, Cutting Machine, sing Machine, Making Machine, Blower Machine, Steam Boiler, Steam Iron, Vacuum Table for Iron, Thread Sucking Machine, Fabric Checking Machine, Pic/Saddle Stitch, Fabric Inspection Table, Electronic Time Record Machine, Snap Pull Test Machine, Light Box, Metal Detector, Auto Carton Bailing Machine, Vertical Trimmer Machine.</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 checked="" type="checkbox"/> Other (Participation Committee)</p> <p><input type="checkbox"/> None</p>
<p>K: Is there any night production work</p>	<p><input type="checkbox"/> Yes</p>

at the site?	<input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
N: Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, please give details: As factory does not provide any accommodation facilities to the workers.

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:40 am Day 1 Time out: 06:50 pm	Day 2 Time in: N/A Day 2 Time out: N/A	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	4 Auditors in 1 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 If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 04 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		
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		
G: Who signed and agreed CAPR (Name and job title)	Md. Amran Hossain, Manager (HR & Compliance)		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	April 04, 2019		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Not Applicable (As workers representative was present during meeting).		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	In Bangladesh, there is no obligation to join trade union and freedom of association and collective bargaining. However, factory management has formed a Participation Committee (PC) as parallel means of trade Union as per 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 or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	424	0	0	0	0	0	0	424
Worker numbers – female	786	0	0	0	0	0	0	786
Total	1210	0	0	0	0	0	0	1210
Number of Workers interviewed – male	20	0	0	0	0	0	0	20
Number of Workers interviewed – female	32	0	0	0	0	0	0	32
Total – interviewed sample size	52	0	0	0	0	0	0	52



A: Nationality of Management	Bangladeshi	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: ___ Bangladeshi ___</p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 ___ Bangladeshi ___</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: _____% workers on piece rate</p> <p>D1: _____% hourly paid workers</p> <p>D2: ___100___% salaried workers</p> <p>Payment cycle:</p> <p>D3: _____% daily paid</p> <p>D4: _____% weekly paid</p> <p>D5: ___100___% monthly paid</p> <p>D6: _____% other</p> <p>D7: If other, please give details</p>	



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: <i>(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)</i>	32 (8 Groups of 4)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 8 D2: Female: 12
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No worker complained anything during the Interview.
I: What did the workers like the most about working at this site?	In interview session workers explained that they got monthly payment on time, correct overtime payment, more than minimum wages, festival bonus and paid leave Whenever they needed. The working environment is comfortable and safe. No evidence of harassment/ discrimination/ forced labour was seen, every worker was Treated equally. Periodically, safety & awareness trainings were provided to the Workers.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Workers expressed that they sometimes wanted to work extra, to earn more money. All workers said that overtime working is voluntary and the

	overtime hours were acceptable.
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(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</i>	
<p>The auditors selected workers randomly from different section, religion and gender for interview. The workers were fearless and active during the interview process. They were satisfied with their wages, payment system and work place environment. Individual and group interview were conducted in a private place without the presence of any representative from the management. Total 52 employees selected for the interview. Among 20 employees were selected for individual interview and total 32 employees 8 Groups of 4 workers were selected for the group interview, all the interviews were favourable with the management. The workers showed a cooperative attitude during the interview process.</p> <p>Based on the workers interview, workers expressed their positive attitude to management and workplace. All workers said that they were satisfied with working condition and the wage in the factory.</p> <p>The information of interviewed workers as follows:</p> <ol style="list-style-type: none"> 1. For child labour issues, all interviewed workers said that the factory checked their ID cards to verify their ages and kept their ID copies during recruitment. No child labour was identified during the audit. 2. The employees could resign at their option and should notice the factory in advance in 60 days. All interviewees said that they can leave factory freely after work -off during the lunch break. 3. For discrimination issues, they said they could obtain the job based on their working experiences and abilities, the female workers or male workers" wages were calculated at the same rate if they engaged for the same work. All interviewees confirmed that no discrimination occurred in the factory. 4. For discipline practice issues, the interviewees said they would be warned if they broke the factory rules. 5. For safety and health issues, the workers were satisfied with the working condition and the factory regularly provided safety training like PPE training, first aid training, firefighting training etc. to the workers. The new employed workers would be trained before they engaged their work. Fire drills were conducted periodically per year, the last external fire drill was conducted on March 03, 2020 and internal fire drill was conducted on February 25, 2020. 6. For working hour's issues, all interviewed worker said that they normally worked 6 days per week and 8 hours per day. All interviewees said that they occasionally overtime worked 2 hours on Week days and 8 hours on per day. Friday is their working holiday. 7. For wages issues, all interviewees said that their wages were calculated by monthly and the wages were paid by cash first seven days of the month. Paid annual leave, festival leave and statutory holiday wage was available for them. 8. For freedom of association issue, all interviewees said they elected 01 employee representatives by themselves. 9. For Regular Employment issue, all interviewees said that the factory had signed contracts with them and kept the copies. 10. For Living Wages and Benefits all interviewees said that factory provides the minimum wages as per the local law and they were aware their rights factory also provides the festival bonus as per the law. 	
N: Attitude of worker's committee/union reps: <i>(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</i>	
Participation committee representative was comfortable with management, workplace and interview	

process. During opening meeting 01 (One) Participation committee representative Antora, Vice President and Operator (Sewing Section) was present and auditors clearly explained her about the audit, audit process, necessity of audit and audit criteria in local language. In the period of interview with workers committee representative discussed her feelings to the auditors without any hesitation and confusion.

O: Attitude of managers:

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

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 had recently implemented a Health & Safety committee to take care of health and safety concerns. Not all parts of the code were implemented; please see relevant section of report. Managers responsible for implementing legal and code standards included the Md. Amran Hossain, Manager (HR & Compliance).

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current systems:

The factory had 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.

2. The factory had designated person Md. Amran Hossain, Manager (HR & Compliance) who is responsible for implementing the standards concerning human rights.

3. The factory had identified their stakeholders and salient issues.

4. The factory had identified and measures their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

5. The factory had identified an adverse impact on human rights within any of their stakeholders; they shall address these issues and enable effective remediation.

6. The factory had a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

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

Details:

1. Human right policy and communication records of human right with employee review

2. Management and workers' interview

3. Factory tour

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: (mainly applicable for the parent company): According to recruitment policy, minimum wage policy, working hour policy and health and safety policy the facility is committed to comply all rules and regulations required by National Constitution and International regulations on human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has a designated person responsible for implementing standards concerning Human Rights Md. Amran Hossain, Manager (HR & Compliance).</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter such as grievance mechanism/ grievance lodging system (grievance box placed in confidential place i.e. wash room). Also they have an open door policy as an alternative grievance lodging system. The facility provides training to the workers, managers, supervisor periodically for increasing the effectiveness of this system.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The business demonstrates effective data privacy procedures for workers' information, which is implemented by the HR department. The facility establishes physical access control, computer access control for maintaining effective data privacy for the workers information. The manager of this department is responsible for this.</p>

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: __2.5__ %	A2: This year __2.2__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	0.59%	
C: 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	C1: Last year: __4.5__ %	C2: This year __4.3__ %
D: 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	4.1%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: Injury and accidents records are kept in register which are named as injury register and accident register respectively. Those registers are maintained by medical personnel.	
F: Annual Number of work-related accidents and injuries per 100 workers: [(Number of work-related accidents and injuries * 100) / Number of total works rs]	F1: Last year: 3.24% Number: 23	F2: This year: 0.92% Number: 5
G: Quarterly (90 days) number of work-related accidents and injuries per 100 workers: [(Number of work-related accidents and injuries * 100) / Number of total workers]	2.31%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work-related injuries * 100) / Number of total workers]	H1: Last year: 1.5%	H2: This year: 1.38%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __85__% workers	I2: 12 months __91__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers
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0B: Management system and Code Implementation

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

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with
- 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.4 Suppliers are expected to communicate this Code to all employees.
- 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current systems:

1. The factory had tried to implement and maintain system for delivering compliance to this code.
2. The factory had operated legally in premises with the correct business licenses to have systems to ensure that all relevant land rights have been complied with the code.
3. The factory had appointed a senior member Md. Amran Hossain, Manager (HR & Compliance) who is responsible for compliance with the code.
4. The factory has communicated this code to their Workers.
5. The facility has posted the ETI code latest version (Version: ETI/V1/04/18) in the production floor and other easily visible area
6. The factory has communicated this code to their all suppliers.

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

Details:

1. Social accountability Policy and Procedure
2. Social accountability assessment Report
3. Management and workers interview
4. Factory tour

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?

- Yes
- No

A1: Please give details: In the last 12 months, the factory had no any fines/prosecutions for non-compliance to any regulations.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

- Yes
- No

B1: Please give details: For effective implementation of the policies and procedures,

	<p>the facility developed forced labour, child labour, discrimination and harassment & abuse policies and procedures to reduce the risks. For proper implementation and maintain the effectiveness of these policies, the facility provides training to the workers, managers and supervisors in all departments of the factory.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Yes, the factory had established relevant procedures about reduce the risk of forced labour, child labour, discrimination, harassment & abuse. The facility posted the policies i.e. forced labour, child labour, discrimination and harassment & abuse on the notice boards. Also, the facility provides awareness training to the workers, manager and supervisors of all departments of the factory in this regard and keeps all training records, photographs, videos as evidences. And all workers had known it.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, legal rights, discrimination, harassment & abuse from the factory.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse, fire drill, fire fighter, first aid, PPE, mid-level management from the factory and they preserved training records, photographs as evidences.</p>
<p>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).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility has an internationally recognized management system certification like BSCI, WRAP, ISO 9001-2015.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: The facility has an independent officer Md. Amran Hossain, Manager (HR & Compliance) is responsible for this department.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Md. Amran Hossain, Manager (HR & Compliance) is responsible for</p>

	implementation of the Code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: There is a policy to ensure all workers information is confidential. Human resource department are responsible for these and they are maintaining all workers information confidential by physical access control and computer access control.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: There is an effective procedure to ensure all workers information is confidential. Human resource department are responsible for these and they are maintaining all workers information confidential by physical access control and computer access control.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessments conducted per year to evaluate policy and procedure effectiveness.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The factory had a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The factory had a policy/code which required labour standards of its own suppliers.
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 N1: Please give details: The site has all required land right licenses such as trade licence, factory licence, incorporation certificate, export and import certification, approved factory (machine) lay out plan by Chief Labour Inspector, approved building plan by authorized govt. body & competent engineer etc. Also, the owner of the facility registered the land through sub-registry office from seller party in all legal process.
O: Does the site have systems in place to conduct	<input checked="" type="checkbox"/> Yes

legal due diligence to recognize and apply national laws and practices relating to land title?	<input type="checkbox"/> No O1: Please give details: The site have systems in place to conduct legal due diligence to recognize and apply 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The facility has written policy on land rights, however it is not included any due diligence the company will undertake to obtain free, prior and informed consent.
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 Q1: Please give details: The factory has evidence that facility site compensated the owner/ lessor for the land prior to the facility being built or expanded.
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 R1: Please give details: The Facility demonstrates alternatives to a 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 S1: Please give details: Not applicable.

Non-compliance:

<p>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</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>
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Observation:

<p>Description of observation: None Observed</p>	<p>Objective evidence observed:</p>
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<p>Local law or ETI requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Not Applicable</p>
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<p>Good Examples observed:</p>	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective evidence observed: Not Applicable</p>

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. The factory does not hold main copy of any legal document of the workers during recruitment. The factory maintains only copies of all hiring documents such application, ID proof, birth certificate, school certificates etc.
2. The workers are free to leave the work place if workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.
3. The facility has displayed overtime policy stating that over time work is voluntary.

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

Details:

1. Factory Policy and Procedure
2. workers' Personnel files
3. Resignation records
4. Employee handbook
5. Management and workers interview
6. Factory tour

Any other comments: None

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>C: Is there any evidence of retention of wages /deposits</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details and category of workers affected:</p>
<p>D: Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding:</p>

<p>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.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe finding: No such kind of statement was published.</p> <p><input type="checkbox"/> Not applicable</p>
<p>G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please describe finding: No such kind of statement was published.</p>
<p>H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please give details and category of workers affected: The site understands the risks of forced/ trafficked/ bonded labour in its supply chain and there is an internal supplier monitoring system in place. However, no forced/ trafficked/ bonded labour has been identified through internal audit.</p> <p><input type="checkbox"/> Not applicable</p>
<p>I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe finding: The site have taken steps to protect their workers form the risk of force / trafficked labour. They developed policy and procedure. They provide training to the workers, manager and supervisors for the awareness. However, no forced/ trafficked/ bonded labour has been identified through internal audit.</p>

Non-compliance:

<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:</p> <p>None Observed</p> <p>Local law and/or ETI requirement</p> <p>Not Applicable</p> <p>Recommended corrective action:</p> <p>Not Applicable</p>	<p>Objective evidence observed:</p> <p>Not Applicable</p>
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Observation:

<p>Description of observation:</p> <p>None Observed</p>	<p>Objective evidence observed:</p>
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<p>Local law or ETI requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Not Applicable</p>
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<p>Good Examples observed:</p>	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective evidence observed: Not Applicable</p>

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. The factory has established a Participation Committee (PC) which is parallel means of trade union. But factory yet no established the Participation Committee selection process instead of election process.
- 2. As per the local law and the company policy factory arrange Participation Committee (PC) meeting munities in every two months and relevant documents are preserved by the factory. Workers can raise their concerns through workers' representatives, telephone, complain box, meeting and their team leader or above.
- 3. Verified and confirmed through records review and interview process that the facility does not discriminate any of the workers such as workers representatives also.
- 4. Factory has a policy where is no restriction imposed to the workers formation of trade union.

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

Details:

- 1. Management interview
- 2. Worker interview
- 3. Complain box register
- 4. PC formation and meeting records
- 5. Grievance handling procedure and records

Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<p><input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Participation Committee) <input type="checkbox"/> None</p>
<p>B: Is it a legal requirement to have a union?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

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 D1: Please give details: Health & Safety Committee and Grievance committee. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The supplier provides adequate facilities to allow the committee to conduct related business.	
F: Name of union and union representative, if applicable:	Not Applicable, as Participation Committee is the parallel means of trade union	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation Committee (PC) has formed as a parallel means.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes, all workers are well aware about their representative as they are elected by themselves.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: November 29, 2018.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Yes, the workers know the topics which can be raised by their representative as the topics are circulated among the workers by PA system and notice board.	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 01 PC (Participation Member) Antora, Vice President (PC) & Operator (Sewing section).	
L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The Participation Committee has been elected on November 29, 2018. The last meeting was held on February 05, 2020 and it took an hour for the meeting. The topics covered in the meeting are as follows: - Discussion about the previous meeting agenda. - Discussion about the how to use of PPE. - Discussion about the awareness of corona virus. - Discussion about the emergency situation.	

M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N/A, as there is no trade union in the factory.	
If Yes , what percentage by trade Union/worker representation	M1: ___% workers covered by Union CBA	M2: ___% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A, as there is no trade union in the factory.	

Non-compliance:	
<p>1. Description of non-compliance: 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</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective evidence observed: Not Applicable</p>

3: Working Conditions are Safe and Hygienic

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

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

ETI

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current systems:

1. The factory established a health and safety policy, and a health and safety committee were formed in the factory.
2. Md. Amran Hossain, Manager (HR & Compliance) was the representative of health and safety system.
3. Check records of firefighting equipment's were available on site; it was identified that all firefighting equipment's were checked by safety guards monthly.
4. Fire drill records with photos showed that the factory conducted fire drill in the factory. The latest external fire drill was conducted at March 03, 2020 and internal fire drill was conducted at February 25, 2020.
5. There was only two electricians in the factory. The certificate was provided by the factory for review during the audit.
6. The factory had provided the fire license and structure safety certificate of factory buildings for review which were approved by the concern authority.
7. There were at least three exit points for the building into the factory.
8. Adequate toilet was provided the segregated male and female workers in the factory as per the law.
9. Firefighting facilities were well equipped in the factory as per specification of Bangladesh Fire Services & Civil Defence Authority.
10. Based on observation on site, the lighting was acceptable at each floor.
11. Based on site observation, potable pure drinking water was provided for workers at production area and drinking water has tested periodically form the concern authority.
12. Based on observation on site, the all factory buildings were secure.

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

Details:

1. Health and safety policy
2. Training records and certificates
3. Fire equipment maintenance records
4. Fire drill records

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>Please give details: The factory has general Health & Safety and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Health & Safety policies were covered in employee's manual.</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>Please give details: There was no such structural addition in the premises. Floor layout as same as approved layout plan from concern authority.</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>Please give details: Shortened safety instruction is written in back side of visitors' ID card as well as visitors were given relevant personal protective equipment before getting entry of the place.</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 provides medical facility to all workers and management. Factory provides a room for medical facility.</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 appoints a Medical Officer Dr. Mst. Shahzadi certified by Bangladesh Medical and Dental Council Registration No. A 55795. He provides medical services to all workers and management staff this factory. There was one Medical Assistant Soheli Akhter for helping the Medical Officer.</p>
<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>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Facility does not provide transport facility to the workers.</p>

<p>H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not applicable, Facility does not provide storage space for workers in their living space.</p>
<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>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: A complete and proper risk assessment including evaluating the arrangements for workers doing overtime has been done by Health & Safety officer in collaboration with Industrial Engineering department. They assess risk periodically and conduct internal audit to control/reduce identified risk.</p>
<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory ensures all requirements on environment as per law.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility management maintain chemical inventory list to avoid banned chemicals as well as procurement department is highly trained on regarding this issue. All other environmental issues taken care as per country legal requirements.</p>

Non-compliance:

1. Description of non-compliance:

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

Noted during factory visit that the eye wash point was not found proper functional into the finishing section located at the ground floor of the building no # 1.

Local law and/or ETI requirement

In accordance with Bangladesh labour Law 2006, section 78 (2):

Where in any establishment the plant or machinery used in a process is not so constructed as to withstand the probable pressure which is produced in the case of such explosion, all practicable measures shall be taken to restrict the spread and effects of the explosion by the provision of chokes, baffles, vents or any other effective apparatus in the plant or machinery.

Recommended corrective action:

It is recommended that the factory should established proper functional eye wash point.

Objective evidence observed:

1. Noted during factory visit
(NC Photo no. 01)

2. Description of non-compliance:

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

Noted during factory visit that the insufficient first aid kits were found into the first aid box into the production floor.

Local law and/or ETI requirement:

In accordance with Bangladesh Labour Rules 2015, Section 76 (2):

If the number of workers/employees is not more than 10 in the concerned institute, department, section and floor where mechanical power is used or if the number of workers/employees is not more than 50 in the workplace where mechanical power is not used, the following equipment's must be each cupboard or almirah of those workplaces.

And

In accordance with ETI Base Code 3.1:

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

Recommended corrective action:

It is recommended that the factory should provide sufficient first aid kits into the all first aid box.

3. Description of non-compliance:

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

Noted during factory visit that aisles marking was found erased into the finishing section located into the ground floor of the production building no # 1.

Local law and/or ETI requirement:

In accordance with Bangladesh Labor Law 2006, Section 62 (6):

A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.

Recommended corrective action:

It is recommended that the factory should redraw the aisles marking into the ground floor of the production building no # 1.

4. Description of non-compliance:

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

Noted during factory visit that emergency floor evacuation plan was found miss

2. Noted during the factory visit
(NC Photo Number: 2)

3. Noted during the factory visit
(NC Photo Number: 3)

4. Noted during the factory visit
(NC Photo Number: 4)

match with the actual lay out of the sewing section located at the 1st floor of the production building no # 1.

Local law and/or ETI requirement:

In accordance with Bangladesh Labour rules 2015 section 55 (8):

The arrangement should be made to show evacuation plan of exit in one or more places easily visible in each floor of each floor of the factory.

Recommended corrective action:

It is recommended that the factory should post the actual emergency floor evacuation plan into the sewing section located at the 1st floor of the production building no # 1.

5. Description of non-compliance:

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

Noted during the factory tour that:

- (a) Approximately 30% sewing machines' eye guard, needle guard were found displaced.
- (b) 3 out of 12 button hole machine pulley covers were found missing into the finishing section located at the ground floor of the production building no. # 1.
- (c) Snap button machine operators were not used eye protector.
- (d) 01 out of 01 spot lifter did not use respiratory mask & hand gloves during spot lifting at the finishing section.

Local law and/or ETI requirement:

In accordance with Bangladesh Labor Law 2006, Section 67 & 78A (1,2,3):

After the commencement of this Act, in every power-driven machinery installed in an establishment

- (a) every set screw, belt or key, or any revolving shaft, spindle wheel or pinion shall be so sunk, encased or otherwise effectively guarded so as to prevent danger;
- (b) all spur, worm and other toothed gearing, which does not require frequent adjustment while in motion, shall be completely encased, unless it is so situated as to be safe if it were completely encased.

and

- (1) No authority shall engage any worker in work without providing him with personal safety equipment's and ensuring uses thereof and a record book shall be maintained in this behalf by the employer in the prescribed manner.
- (2) If any personal safety equipment is supplied but not used, the worker concerned shall be liable.
- (3) Every worker shall be made aware of the hazards of work through training in order to ensure the protection and safety of his professional health in the place of work.

Recommended corrective action:

It is recommended that the factory should provide proper PPE training and

5. Noted during the factory visit (NC Photo Number: 4,5 & 6)

increase proper monitoring to the all workers.

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. The factory had established policy and procedure on prohibiting of child labour.
- 2. Based on recruiting instruction review, all applicants should write register sheets during recruiting, and all information identified in the register sheets should be verified. And HR staff should interview with applicants and check ID cards to verify ages.
- 3. Sampling basis 52 employees' personal files has taken for reviewed that the factory kept valid and sufficient age information such as copies of ID card, education certificate or other documents with employment history. And personal files showed that no child labour and young worker was identified in the factory.
- 4. Based on observation on site and workers interview, no child labour and young worker was identified during the audit.

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

Details:

- 1. Recruitment policies
- 2. Employees' personal files/Employment registration/roster
- 3. Management and workers interview
- 4. Factory tour

Any other comments: None

A: Legal age of employment:	18
B: Age of youngest worker found:	19 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to	<input type="checkbox"/> Yes

hazardous work assignments? (Go to clause 3 – Health and Safety)	<input checked="" type="checkbox"/> No E1: If yes, give details
---	--

Non-compliance:

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: Not Applicable	Objective evidence observed: Not Applicable
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Observation:

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

Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable
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5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The factory management provides appoint letter to all workers mentioning their salary structure, employment conditions.
2. The workers are enjoying benefits such as social insurance, casual leave, sick leave and maternity leave as per law.
3. Wages being paid within 7 working days of the next month.
4. Factory provides cash directly to the workers.
5. No illegal deduction from employees has been identified through documents reviewed and confirmed workers during the interviewed.

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

Details:

1. Document review
2. Worker interview
3. Management interview

Any other comments: None

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Objective evidence observed:

Not Applicable

Recommended corrective action:	
Not Applicable	

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

Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:
1. The factory provides attendance bonus to the workers.	Documents review, management and workers interview.

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal minimum: 8 hours per day 48 hours per week	A1: Legal minimum: 8 hours per day 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal minimum: 2 hours per day 12 hours per week	B1: Legal minimum: 2 hours per day 12 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: BDT.8000/month	C1: Legal minimum: BDT.8000/month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at</i>	Legal minimum:	D1: Legal	D2:

site, please state if possible per hr, day, week, and month)	200% of basic Wage.	minimum: 200% of basic wage	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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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
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A1: If No , why not?	Not Applicable
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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)	52 attendance records and payroll records from February 2020 (Current month) 52 attendance records and payroll records from August 2019 (Random month) 52 attendance records and payroll records from March 2019 (Initial month)
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C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If Yes, please give details: C1: If Yes, please give details: The Government has finally announced the new pay structure which was implemented from 1st January, 2019 for the workers of the Garments Industries. The Gazette Notification has been published on 24th January, 2019. There are two separate pay structures; one for the garment workers (Schedule A) and another for the staff level (Schedule B) employees.</p> <p>1. For the workers (Schedule A):</p> <table border="1"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>House rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk.10,938</td> <td>Tk.5469</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.18,257</td> </tr> <tr> <td>Grade 2</td> <td>Tk.9,044</td> <td>Tk.4522</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.15,416</td> </tr> <tr> <td>Grade 3</td> <td>Tk.5330</td> <td>Tk.2665</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9845</td> </tr> <tr> <td>Grade 4</td> <td>Tk.4998</td> <td>Tk.2499</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 9347</td> </tr> <tr> <td>Grade 5</td> <td>Tk.4683</td> <td>Tk.2342</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8875</td> </tr> <tr> <td>Grade 6</td> <td>Tk.4380</td> <td>Tk.2190</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8420</td> </tr> <tr> <td>Grade 7</td> <td>Tk.4100</td> <td>Tk.2050</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk. 8000</td> </tr> </tbody> </table>	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk.10,938	Tk.5469	Tk.600	Tk.350	Tk.900	Tk.18,257	Grade 2	Tk.9,044	Tk.4522	Tk.600	Tk.350	Tk.900	Tk.15,416	Grade 3	Tk.5330	Tk.2665	Tk.600	Tk.350	Tk.900	Tk. 9845	Grade 4	Tk.4998	Tk.2499	Tk.600	Tk.350	Tk.900	Tk. 9347	Grade 5	Tk.4683	Tk.2342	Tk.600	Tk.350	Tk.900	Tk. 8875	Grade 6	Tk.4380	Tk.2190	Tk.600	Tk.350	Tk.900	Tk. 8420	Grade 7	Tk.4100	Tk.2050	Tk.600	Tk.350	Tk.900	Tk. 8000
	Grade	Monthly basic wage	House rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage																																																			
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		2. For the Staff Level (Schedule B) Employees:				
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If No , please give details: N/A				
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Lowest actual wages found: The Government has announced the new pay structure which was implemented from 1st January, 2019 for the workers of the Garments Industries. The Gazette Notification has been published on 24th January, 2019. The minimum wage of the workers of Grade - 7 is as follows: BDT. 8,000 per month (Basic BDT. 4100, House rent 50% of the Basic which is BDT. 2050, Medical allowance BDT.				
F: Please indicate the breakdown of workforce per earnings:	F1: <u>0</u> % of workforce earning under minimum wage F2: <u>51.76</u> % of workforce earning minimum wage F3: <u>48.24</u> % of workforce earning above minimum wage					
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i>					
H: What deductions are required by law e.g. social insurance? Please state all types:	As per Bangladesh Labour Law 2006, Section 125, factory may deduct wages for unauthorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc. However, factory is deducting for unauthorized absence and revenue stamp only.					
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Absent. 2. Revenue stamp. Please describe: In this facility, the management only deducts for unauthorized absent and revenue stamp.			
		I2: Please list all deductions that have	1. N/A 2. N/A			

	not been made.	Please describe: N/A
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were any inconsistencies found? (if yes describe nature)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	L1: Please give details: No, records do not reflect all time worked. For instance, are workers asked to attend meetings before or after work but paid for their time.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as per Bangladesh "The Minimum Wage Gazette Notifications for RMG sector" that has published on 24th, November 2019 and The Minimum Wage Gazette has revised on 24th January 2019. M1: Please specify amount/time:
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: Please give details: As per law, the facility incremented workers salary after one year of job completion. The payroll department is responsible to ensure the increment of workers and verify unauthorized deduction before payment.
O: Are workers paid	<input checked="" type="checkbox"/> Yes	

<p>in a timely manner in line with local law?</p>	<p><input type="checkbox"/> No</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 P1: Please give details: HR factory rules review, payroll records review and employee's interviews" interview, it was confirmed that equal rates are being paid for equal work. All the employees were paid by hourly.</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 Q1: If other, please explain:</p>

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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

Current Systems and Evidence Examined

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

Current systems:

1. The normal working hour system of 8 hours a day, 48 hours a week was carried out in the factory.
2. The attendance records showed that workers worked overtime on Workdays and Friday is closed for their weekly holiday.
3. The factory kept and provided attendance records to the audit day for review during the audit.
4. Based on attendance records review, the all workers had enjoyed one day off per week.

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

Details:

1. Employee interview
2. Payroll records
3. Job card records
4. Production records

5. Other document

Any other comments: None

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

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: For the timekeeping system factory are used electric time keeping system.				
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: N/A			
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
		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	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Through provided document review, standard or contracted standard hours did not exceed the law or 48 hours per week.			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
	Maximum number of days worked without a day off (in sample):				
	Through provided documents, it was found that workers were provided with 1 day Off in every 7 day period.				

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: Not Applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	H1: If yes, please give details: Exception for 6 months: Government has exempted section 100, 102 & 105 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. Exception for 6 months This exemption has been extended several times in last few years and latest extension was on April 05, 2018 and it will be in effect from April 17, 2018 to October18, 2018."
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 12 hours/week in February 2020 12 hours/week in August 2019 12 hours/week in March 2019	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___5.2___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on employment agreement, handbook, worker interview, the overtime in the factory was voluntary.
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	M1: Please give details of normal day overtime premium as a % of standard wages: Based on the provided attendance records and payroll records review, workers were paid 200% of normal wage rate for Weekday overtime; 200% of normal wage rate for Weekend overtime; No OT on Friday Holiday.

<p>N: Is overtime paid at a premium?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency: 100% and monthly.</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>	<input checked="" 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	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p>
		<p>Not applicable</p>
<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>	<input checked="" 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 checked="" type="checkbox"/> Other reasons (please specify)	<p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p>
		<p>Exception for 6 months: Government has exempted section 100, 102 & 105 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent. Exception for 6 months; This exemption has been extended several times in last few years and latest extension was on April 05, 2018 and it will be in effect from April 17, 2018 to October 18, 2018."</p>
<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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p>	
<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>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.
2. The factory provides the same pay to male/ female employees.
3. No complain or records found for pregnancy test.
4. There is no restriction formation of trade union in the factory.

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

Details:

1. Management interview
2. Worker interview
3. Local and national law
4. Personal files
5. Compensation records
6. Termination & retirement records
7. Training records
8. Complain register

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>98</u> % A2: Female <u>2</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	None
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details:

Professional Development

<p>A: What type of training and development are available for workers?</p>	<p>The facility has a training centre where newly recruited workers were trained up and then transferred to the production floor. However, there is an Industrial Engineering department in place who are the responsible to evaluate the efficiency of workers and trained up then who are less competent. Also trained the workers & supervisors by internal management & external stakeholders or trainers like BKMEA, GIZ & NGOs.</p>
--	---

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please give details: N/A</p>
---	--

Non-compliance:	
<p>Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None Observed</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

8: Regular Employment Is Provided

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

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

ETI

- 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

- 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
- 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
- 8.5 Employment agencies must only supply workers registered with them.
- 8.6 Workers pay no recruitment fee at any stage of the recruitment process.
- 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

- 1. The factory had documented disciplinary rules and communicates to all workers. And the disciplinary rules were fair, reasonable and they met law requirements.
- 2. Work performed was on the basis of recognized employment relationship established through national law and practice.
- 3. No homework were arranged; no apprenticeship schemes were practiced in this factory.

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

Details:

- 1. Employee Manual
- 2. Hiring and termination procedure
- 3. Labour contract
- 4. Personal files
- 5. Payroll records
- 6. Management and workers interview

Any other comments: None

Non-compliance:

Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

Responsible Recruitment

All Workers

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

- Terms & Conditions presented
- Understood by workers
- Same as actual conditions

A1: If any are unchecked, please describe finding and specific category (ies) of workers affected: Not Applicable

B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of

- Yes
- No

B1: If yes, please describe details and specific category(ies) of workers

recruitment/placement?	affected: Not Applicable
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: 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 or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i>	
A: Type of work undertaken by migrant workers:	Not applicable as there were no migrant workers into the facility.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: N/A B2: Total number of (outside of local country) recruitment agencies used: N/A
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable C2: 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 D1: If yes, number and example of roles: Not applicable

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable
B: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other B1 – If other, please give details: Not applicable
C: If any checked, give details:	Not applicable

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):	A1: 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 D1: Please give details: Not applicable
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not applicable

Contractors:

Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,

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

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

It was verified through document review, factory tour, management interview and employee interview that no sub-contracting & Home-working was used by this factory.

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

Details:

- Management interview
- Worker interview
- Production capacity plan
- Goods in/out register
- Production process of the factory
- Policies and procedures

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

<i>Process Subcontracted</i>	<i>Process 1</i>	<i>Process 2</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 3</i>	<i>Process 4</i>
<i>Name of factory</i>		
<i>Address</i>		

<i>Process Subcontracted</i>	<i>Process 5</i>	<i>Process 6</i>
<i>Name of factory</i>		
<i>Address</i>		

Details: N/A

Non-compliance:

Description of non-compliance:

NC against ETI/Additional Elements NC against Local Law NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI/Additional elements requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

Summary of sub-contracting – if applicable

Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting

Yes
 No
 A1: Please describe:

B: If sub-contractors are used, is there evidence this has been agreed with the main client?

Yes
 No
 B1: If **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 D1: 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 A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

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

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
 Additional elements:
 9.2 companies should provide access to a confidential grievance mechanism for all workers

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Grievance register, meeting minutes of workers participation committee are available for reviewing.
B: If Yes , are workers aware of these channels and have access? Please give details.	Grievance boxes are kept in every toilet in a safety & confidential place and all boxes are checked once in a month and workers' participation committee is arranging workers' meeting regularly. If any complain comes, it gets entry in the grievance register and verified by the concern officer and all these registers are available for reviewing.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Grievance box
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: The facility establishes details grievance procedures involving workers, workers representative, management, communities, suppliers and stakeholders.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>II: If yes, please give details</p>
--	--

Current Systems and Evidence Examined

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

Current systems:

- The factory management established a disciplinary procedure for workers misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Confirmed by workers interview, they were aware of the disciplinary procedure.
- The factory established a policy on Harsh Treatment. Confirmed by workers interview, there was no such negative evidence happened in the past.
- There was an internal process for grievance, which is an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination etc.). 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:

- The relevant policy on prevention of harassment and abuse.
- Internal grievance procedure documentation.
- Training records.
- Management and workers interview
- Factory visit

Any other comments: None

Non-compliance:	
<p>Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code:</p> <p>None Observed</p> <p>Local law and/or ETI requirement:</p> <p>Not Applicable</p> <p>Recommended corrective action:</p> <p>Not Applicable</p>	<p>Objective evidence observed:</p> <p>Not Applicable</p>

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

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

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

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

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current systems:

1. The factory recruited the new workers by the advertisements or the employee's recommendation.
2. All workers would be reviewed and validated the original documentation before they employed.

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

Details:

- Management interview
- Worker interview
- Employment records
- Appointment letter
- Personal file

Any other comments: None

Non-compliance:

Description of non-compliance:

NC against ETI/Additional Elements NC against Local Law NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

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

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

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

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

1. The factory management maintained all legally required environmental documents place which proved that the production of the factory was in compliance with the related environmental regulations.
2. Based on worker's interview, they were trained on environmental protection.
3. The factory established environment policy including environment emergency action procedures, relevant procedure and carried out environment management system.

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

Details:

1. All legally required environmental documents were provided for review.
2. Environmental policy
3. Renewal energy specification
4. Workers and management interview.
5. Factory tour

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

Noted during factory visit that the wastage area was not found segregated as per the types and hazards.

Local law and/or ETI requirement

In accordance with Bangladesh Labour Law 2006, Section 54 & Bangladesh Labour Rules 2015, Section 40 (2):

Effective arrangements shall be taken in every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.

& Metallic objects, wastes with terrible odor, chemical wastes and medical wastes should be removed in separate boxes every day.

Recommended corrective action:

It is recommended that the factory should segregated the wastage area as per the types and hazards.

Objective evidence observed:

1. Noted during factory visit (NC Photo No. 8)

Observation:

Description of observation:

None Observed

Local law or ETI/additional elements requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

Appendix 1

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

Not Applicable please x




Photo Form Non-Compliance Photo

<p>25 Mar 2020 12:09:54 PM Murad Apparels Limited, South Gouripur, Savar, Dhaka-13</p>	<p>Mar 25, 2020 11:49:59 AM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South Gouripur, Ashulia, Sa</p>	<p>Mar 25, 2020 12:00:00 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South Gouripur, Ashulia, Sa</p>
<p>1. The eye wash point was not found proper functional into the finishing section located at the ground floor of the building no # 1.</p>	<p>2. The insufficient first aid kits were found into the first aid box into the production floor.</p>	<p>3. Aisles marking were found erased into the finishing section located into the ground floor of the production building no # 1.</p>
<p>Mar 25, 2020 11:47:42 AM Murad Apparels Limited, South Gouripur, Ashulia, Sa</p>	<p>25 Mar 2020 12:08:45 PM Murad Apparels Limited, South Gouripur, Savar, Dhaka-13</p>	<p>Mar 25, 2020 11:57:32 AM Anwar Jang Saran Dhaka District Dhaka Division Murad Apparels Limited, South Gouripur, Ashulia, Sa</p>
<p>4. Emergency floor evacuation plan was found miss match with the actual lay out of the sewing section located at the 1st floor of the production building no # 1.</p>	<p>5. 3 out of 12 button hole machine pulley covers were found missing into the finishing section.</p>	<p>6. Snap button machine operators were not used eye protector.</p>

 <p>Mar 25, 2020 11:19:13 AM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South Gouripur, Ashulia, Sa</p>	 <p>Mar 25, 2020 12:33:48 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South Gouripur, Ashulia, Sa</p>
<p>7. Approximately 30% sewing machines' eye guard, needle guard were found displaced.</p>	<p>8. The wastage area was not found segregated as per the types and hazards.</p>


General Photo

 <p>Mar 25, 2020 12:35:17 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, S</p>	 <p>Mar 25, 2020 12:32:32 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, S</p>	 <p>Mar 25, 2020 11:46:05 AM Anwar Jang Sarak Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, S</p>
<p>Factory main gate</p>	<p>Factory overview</p>	<p>Roof Top</p>

 <p>Mar 25, 2020 12:08:21 F Murad Apparels Limited, South gouripur, Ashulia, S</p>	 <p>Mar 25, 2020 11:52:57 A Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, S</p>	 <p>Mar 25, 2020 11:58:54 A Anwar Jang Sarak Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, S</p>
<p>Cutting Section</p>	<p>Sewing Section</p>	<p>Iron section</p>

 <p>Mar 25, 2020 12:00:59 F Murad Apparels Limited, South gouripur, Ashulia, S</p>	 <p>Mar 25, 2020 12:26:11 F Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, S</p>	 <p>Mar 25, 2020 11:48:01 A Murad Apparels Limited, South gouripur, Ashulia, S</p>
<p>Finishing Section</p>	<p>Finished Goods Area</p>	<p>Fire Extinguisher</p>



 <p>Mar 25, 2020 2:31:13 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 3:11:20 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 12:23:31 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>
<p>Rescuer Team</p>	<p>First Aider Team</p>	<p>Medical Room</p>
 <p>Mar 25, 2020 12:13:36 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 11:52:50 AM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 12:12:06 PM Anwar Jang Sarak Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>
<p>Drinking Water</p>	<p>P.A System</p>	<p>Grievance Box</p>
 <p>Mar 25, 2020 12:14:04 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 12:33:03 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 12:32:51 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>
<p>Workers Dining Area</p>	<p>Generator Room</p>	<p>Sub-Station Area</p>

 <p>Mar 25, 2020 12:30:41 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 12:32:16 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>	 <p>Mar 25, 2020 12:30:50 PM Unnamed Road Dhaka District Dhaka Division Murad Apparels Limited, South gouripur, Ashulia, Sav</p>
<p>Boiler Room</p>	<p>Fire Hydrant Pump</p>	<p>Compressor Room</p>



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

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