Sedex Members Ethical Trade Audit Report

Version 6.1

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC1070289	Sedex Site Reference: *(only available on Sedex System)*	ZS421587671
Business name (Company name):	Norquest Brands		
Site name:	NORQUEST BRANDS - 02		
Site address:	Block-E, 4th Floor 401, 5th Floor 501, Sharanam Smart Space, Opp. Anupam Cinema, Ashima Complex, Khokhra, Ahmedabad 380026 IN	Country:	IN
Site contact and job title:	Ms. Jayshri Patadiya / HR Manager		
Site phone:	09377732800	Site e-mail:	compliance@norquestbrands.com
SMETA Audit Pillars:	☑ Labour Standards ☑ Health and Safety (plus Environment 2-Pillar)	☑ Environment 4-pillar ☑ Business Ethics	
Date of Audit:	2024-04-26		

Audit Company Name:
Intertek India

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

Auditor Team			
Lead Auditor:	Mala Biredar	APSCA Number:	21700385
Additional Auditors:	Bina Patel		21700669
Date of declaration:	2024-04-26		

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

Site Representation	
Full Name:	Ms. Jayshri Patadiya
Title:	HR Manager
Date of declaration:	2024-04-26
Comments: *Any exceptions to this must be recorded here (e.g. different sample size):* *Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).* *The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives*	
None	

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non–Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation	0.B.3		1	0	0	NC - ZAF600465624
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1	§1 §2	2	0	0	NC - ZAF600465622 NC - ZAF600465625
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided	8.7	§3	1	0	0	NC - ZAF600465623
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2–pillar			0	0	0	
10B4 - Environment 4–pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	According to Section 7A (2b) of The Factories Act, 1948, Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
§2	In accordance with factories rule 1948, 13. Ventilation and temperature.—(1) Effective and suitable provision shall be made in ever factory for securing and maintaining in every workroom— (a) adequate ventilation by the circulation of fresh air.

§3	According to Schedule I-B of the Model Standing Orders on additional items applicable to all industries: (1) SERVICE RECORD: Matters relating to service card, token tickets, certification of service, change of residential address of workers and record of age. (i) Service Card.- Every industrial establishment shall maintain a service card in respect of each workman in the form appended to these orders, wherein particulars of that workman shall be recorded with the knowledge of that workman and duly attested by an officer authorised in this behalf together with date. (ii) Certification of service.- (a) Every workman shall be entitled to a service certificate, pacifying the nature of work (designation) and the period of employment (indicating the days, months, years), at the time of discharge, termination, retirement or resignation from service;

Site Details

<table>
<tr><th colspan="4">Site Details</th></tr>
<tr><td>Company Name</td><td colspan="3">Norquest Brands</td></tr>
<tr><td>Site Name</td><td colspan="3">NORQUEST BRANDS - 02</td></tr>
<tr><td rowspan="2">GPS location
(if available)</td><td>GPS Address:</td><td colspan="2">Not available</td></tr>
<tr><td>Coordinates:</td><td colspan="2">Not available</td></tr>
<tr><td>Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections</td><td colspan="3">The factory license obtained dated 01-09-2022 , no 49725 valid till 31/12/2027</td></tr>
<tr><td>Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc</td><td colspan="3">Manufacturing of Cotton fabric bags</td></tr>
<tr><td>Site description:
(Include size, location, and age of site. Also, include structure and number of buildings)</td><td colspan="3">Factory is located at Block-E, 4th Floor 401, 5th Floor 501, Sharanam Smart Space, Opp. Anupam Cinema, Ashima Complex, Khokhra, Ahmedabad 380026 IN in commercial building at 4th and 05th floor. There were a total 93 employees are employed by the facility. The facility area is 994 square ft and built-up area is about 1347 square fts with total 1 concrete building since August 2022. Facility is operating in shared building & from Ground floor to Third floor which are occupied by other units. Thers is common staircases and common passenger lift for all units. Facility having total 64 sewing machines in production lines, among of those 50 were working and 14 were ideal on the day of audit due to less orders. Floor wise details as below specific to facility:</td></tr>
<tr><td rowspan="4">Structure and number of buildings</td><td>Building Name:</td><td colspan="2">Building 1</td></tr>
<tr><td>Floor</td><td>Description</td><td>Remark</td></tr>
<tr><td>4th</td><td>Stitching, Cutting, Checking, RM store</td><td>None</td></tr>
<tr><td>5th</td><td>Checking, Pressing, Packing, Lunch area, Finished goods storage</td><td>None</td></tr>
<tr><td>Visible structural integrity issues (large cracks) observed?</td><td colspan="3">☐ Yes ☑ No
Please give details:
No cracks were observed.</td></tr>
<tr><td>Does the site have a structural engineer evaluation?</td><td colspan="3">☑ Yes ☐ No
Please give details:
Facility has obtained structure stability certificate Form 1 A dtd. 27.10.2023 Valid till 5 years.</td></tr>
</table>

Site function	☐ Agent ☑ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack house ☐ Primary Producer ☐ Service Provider ☐ Sub-contractor
Months of peak season	Select a month to Select a month
Process overview	Raw Material storage - Cutting- Stitching- Pressing- Packing-Dispatch.
What form of worker representation is there on site?	☐ Union ☑ Worker Committee ☑ Other ☐ None
Please give details:	Grievance Committee
Is there any night production work at the site?	☐ Yes ☑ No
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No Please give details: Not applicable, Facility has not provided accommodation internally or externally

Audit Parameters			
Time in and time out	Day 1		
	In	09:50	
	Out	17:30	
Audit type:	PERIODIC		
Was the audit announced?	ANNOUNCED		
Was the Sedex SAQ available for review?	No		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Ms. Jayshri Patadiya / HR Manager		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No union present in the facility . It is not required by law.		
Reason for absence during the audit	No union present in the facility . It is not required by law.		
Reason for absence at the closing meeting	No union present in the facility . It is not required by law. It was observed during document review and interaction with management that SAQ was filled 100% by the facility and auditors have verified, however there was a technical glitch on SEDEX portal of facility, they were not able to submit on the portal, thus observation not raised.		

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	25	0	0	0	0	0	0	25
Worker numbers – female	68	0	0	0	0	0	0	68
Total	93	0	0	0	0	0	0	93
Number of Workers interviewed – male	2	0	0	0	0	0	0	2
Number of Workers interviewed – female	8	0	0	0	0	0	0	8
Total – interviewed sample size	10	0	0	0	0	0	0	10

Nationalities Structure		
Nationality of Management	Indian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Indian	approx %: 100%
Was this list completed during peak season?	☐ Yes ☑ No Please give details: Facility has constant production, No such peak season.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	Nil

Worker Interview Summary	
Were workers aware of the audit?	☑ Yes ☐ No
Were workers aware of the code?	☐ Yes ☑ No
Number of group interviews:	1 group of 4 employees
Number of individual interviews:	Male: 2 Female: 4
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.	☑ Yes ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes ☐ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Timey wage payment. Safe & hygiene work environment
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	Attitude towards working hours was favourable. Workers were free to leave their workplace after their shift, no overtime work reported either from the records or interviews.
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

Attitude of workers:
10 employees were selected for interview. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management
Attitude of worker's committee/union reps:
Based on the interaction with grievance committee members, it was noted that committee representatives are not discriminated, and grievances stated by the workers were effectively solved by the facility management. They were allowed to conduct regular meetings. Also, worker interviews confirmed that meetings were conducted during working hours only. Further no negative comments were received.
Attitude of managers:
The facility management showed a positive attitude to this audit during the whole process. Facility team was very proactive & showed active participation in the audit. All documentation requested for review was provided timely.

0A - Universal Rights covering UNGP [Summary of Findings]
0A: Compliance Requirements 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights 0.A.3 Businesses shall identify their stakeholders and salient issues. 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights. 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation. 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Facility has established policy on human rights covering UNGP principles and is endorsed by the Top management. Policy also includes transparent system of confidential reporting for concerns related to human rights. 2. Facility has designated Ms. Jayashree Patadiya - HR Manager-Compliance and Regulatory responsible for implementing standards on human rights. 3. No human rights violation was observed in the facility. Same also confirmed from worker interviews. 4. Facility has identified its stakeholders & their salient issues. Also, facility has evaluated direct, indirect & adverse impact on human rights through its stakeholders & its process. 5. Facility provided training on human rights. Last training on was provided on 30.03.2024 at all the departments covering 29 employees. 6. Further, facility has communicated ETI base code to its stake holders like labour contractors & suppliers. 7. Facility has not provided refresher training to employees, also 30 % employees were not aware about the ETI code requirements. ETI base code training to employees was provided during their joining i.e. in the year of 2022. Please refer NC
Evidence examined:
•Human rights policy & procedure. •Communication records of ETI base code & code of conduct to contractors & suppliers. •ETI training record. •Interaction with Management and Interview with employees.
Any other comments:
None

Policy statement that expresses commitment to respect human rights?	☑ Yes ☐ No Please give details: Facility policy expresses commitment to respect human rights

Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: All the policies are communicated during induction and posted on notice board.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	☑ Yes ☐ No Please give details: Facility has designated Ms. Jayashree Patadiya - HR Manager
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☑ Yes ☐ No Please give details: Facility has provided following grievance mechanism for confidential reporting and anonymously without fear of retaliation. 1.Works & Safety committee representatives 2.Grievance Committee representatives 3.Suggestion / complaint Box
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes ☐ No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☑ Yes ☐ No Please give details: Facility has documented data privacy policy which ensures all employees, supplier and customer information remains confidential
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 0.0% This year 0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	0.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 15.0% This year 15.0%

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	16.0%
Are accidents recorded?	☑ Yes ☐ No Please give details: Facility has maintained accident register in the prescribed format of Form 29. However, no accidents occurred till date.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Ms. Jayashree Patadia– HR Manager is responsible for implementation of all the social compliance activities in the facility. 2. Based on interaction with the facility management, it was understood that the facility management has communicated ETI Base code requirements to all the employees. 3. Facility has not provided refresher training on ETI base code & other social policies in batches. Last training was provided on 2022 during joining, 30% of sampled workers were not aware about the ETI base code. Please refer NC. 4. Further facility has communicated ETI base code to its stake holders like labour contractors & suppliers. 5. Facility has also displayed ETI base code in local language in its premises. 6. The audited facility is operating in the Industrial area & land on which they are operating has been obtained by the facility on lease basis. Lease deed agreement between facility management & government authority verified on the day of audit. 6. Facility has conducted Internal audit to verify the effectiveness of social compliances on 10 to 12 July 2023.
Evidence examined:
•Facility Policy and Procedures- Company code of conduct, land rights policy, data privacy policy •Training materials used stipulates complying with elements of ETI Base Code. •Factory license •Building stability certificate dated 27/10/2023 •Employees' training records showed the facility conducted training for employees about the social compliances & ETI base code.
Any other comments:
None

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No Please give details: The Facility has not been subject to any fines in last 12 months
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: Facility has maintained policy and procedure to reduce the risk of forced labour, Child labour, discrimination, harassment & abuse.

If Yes, is there evidence (an indication) of effective implementation? Please give details.	These policies are displayed at notice board and communicated to all employees. From worker interviews it was noted that awareness on social policies & ETI Base Code was not good enough. NC raised
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: The managers and workers confirmed that they have received training on forced and child labour, discrimination, harassment & abuse through regular meetings.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☑ Yes ☐ No Please give details: Training records including interaction with management / employees shows and confirms that training given to all managers and workers was effective. Introductory training record for new employees.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	☐ Yes ☑ No Please give details: No such certification obtained
Is there a Human Resources manager/department?	☑ Yes ☐ No Ms. Jayashree Patadia– HR Manager
Is there a senior person /manager responsible for implementation of the code?	☑ Yes ☐ No Please give details: Mr. Parikh Sood - Director
Is there a policy to ensure all worker information is confidential?	☑ Yes ☐ No Please give details: Facility have a data privacy policy to ensure all worker information remain confidential.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes ☐ No Please give details: Facility has a procedure to ensure that confidential information remain confidential and share on need basis only
Are risk assessments conducted to evaluate policy and procedure effectiveness?	☑ Yes ☐ No Please give details: Facility has established potential risk analysis system with necessary corrective actions to reduce these evaluated risks. Last risk assessment conducted on 01.09.2023.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: Yes. Facility has a process to address issues found when conducting risk assessments during periodic management meetings.

Does the facility have a policy/code which require labour standards of its own suppliers?	☑ Yes ☐ No Please give details: Facility has documented social policies on labour standards for its own employees & suppliers too.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☑ Yes ☐ No Please give details: Facility has valid sales deed agreement no: 14014 dtd.04.1.2021 verified on the day of the audit.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☑ Yes ☐ No Please give details: Facility has taken legal opinion before purchase. All the original purchase papers were available.
Does the site have a written policy and procedures specific to land rights?	☑ Yes ☐ No Please give details: Facility has documented policy on land rights.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	☑ Yes ☐ No Please give details: Facility has valid sales deed agreement no: 14014 dtd.04.1.2021 verified on the day of the audit.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☑ Yes ☐ No Please give details: Facility had obtained building space in rural area after legal compliant formalities which does not have any adverse effect.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	☐ Yes ☑ No Please give details: There was no evidence of illegal appropriation of land for facility building or expansion of footprint.

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	CLOSED
Reference	ZAF600465624
Clause	0B - Management Systems and code Implementation
Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees
Subcategory	Site's Awareness of Code/Legal Requirements
New or carried over?	☑ New ☐ Carried Over
Resolved by audit	ZAA600061477
Root cause	☑ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
ETI code	0.B.3 - Suppliers are expected to communicate this Code to all employees.
Explanation to the non compliance	It was noted from the document review and management discussion that facility has not provided refresher training to employees, also 30 % employees were not aware about the ETI code requirements. ETI base code training to employees was provided during their joining i.e. in the year of 2022.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	It is recommended to the facility to ensure that ETI base code training is provided on regular basis.
Additional comments	We have given refresher training to all workers regarding ETI Base code. Verified

1 - Freely chosen Employment [Summary of Findings]
1: Compliance Requirements 1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.Facility has a policy which prohibits forced labour, and this was available for review. 2.There was a formalized application procedure which states that workers must present their identity cards for proof of age but only copies must be kept in the personnel files and the originals were given back to the workers. 3.The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. 4.The factory did not require any payment for work tools, PPE, Identity card, trainings, etc. 5.The factory did not use prison labour.
Evidence examined:
•Policy & procedures – No bonded/force labour policy •Personnel files including application forms & appointment letters for available sampled employees. •Time records. •Management interaction & employee interview.
Any other comments:
None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No Please give details: Facility has documented social policies like forced labour, bonded labour. No such evidences observed on the day of audit
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable Please give details: Not applicable

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☑ No Please give details: There is no evidence of any restrictions on workers' freedoms to leave the site at the end of the work day.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☑ Yes ☐ No ☐ Not Applicable Please give details: Facility has documented social policies like forced labour, bonded labour. No such types of employees are noticed in supply chain.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes ☐ No Please give details: Facility has policy not to employ forced / trafficked labour. Facility has implemented system like suggestion box, work committee and grievance committee to identify and resolve issues related to forced/trafficked labour

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.Facility encourages and respects all employees' rights to join union freely. 2.Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision. 3.The facility does not restrict employees on organizing trade unions and has an open approach to get associated with trade unions and their organizational activities without management interference. 4.Facility does not have any union. 5.Facility has also formed effective grievance committee consist of 6 members where workers can raise grievance through committee members. 6.Facility has installed suggestion box at accessible location where employees can share their concerns anonymously. Log of suggestion box is checked regularly. 7.There was no evidence of suppression of employees' rights. 8. Recent Grievance committee meetings held dated 11.03.2024
Evidence examined:
•Facility policy on freedom of association •Interaction with committee representatives. •Interaction with Management and Interview with employees
Any other comments:
None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	☐ Union ☑ Worker Committee ☑ Other ☐ None
Other details:	Grievance committee
Is it a legal requirement to have a union?	☐ Yes ☑ No
Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	☑ Yes ☐ No Please give details: Facility has formed grievance committee and has made agreement NGO for Anti sexual harassment committee as there were female employees.
Is there evidence of free elections?	☐ Yes ☑ No

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☑ Yes ☐ No Please give details: Based on the employees interaction, it was observed that, grievance committee representatives are free to carry out their functions and meetings on periodic basis and the records for the same were maintained.
Name of union and union representative, if applicable:	Not applicable as facility does not have any union.
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Facility has formed grievance committee. Meetings are held quarterly.
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes ☐ No Please give details: Workers found aware of their representatives. No legal requirement of representatives election.
Were worker representatives freely elected?	☐ Yes ☑ No
Date of last election:	null
Do workers know what topics can be raised with their representatives?	☐ Yes ☑ No
Were worker representatives/union representatives interviewed?	☑ Yes ☐ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The Grievance committee will meet quarterly and the topic discussed in recent grievance committee meetings held dated 11/03/24 shows no pending grievance and suggestion from workers
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

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

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

1. General Health and Safety management •Ms. Jayashree Patadia- HR Manager is responsible for Health & Safety aspects for the site. •Potable water was freely available in all areas. Last test was conducted on 25/11/2023 by external laboratories. •Adequate & clean toilets were always available to the workers all the time. •Ventilation, temperature, and lighting were adequate for the production processes •The facility including its workstations, storage areas, utilities were generally neat and clean & found safe. •Facility does regular pest control through recognized pest control agency Complete Pest Control Services. Rodent boxes & fly catcher are installed at relevant locations. •Facility has formed works & safety committee that includes health and safety issues wherein regularly meetings are conducted. Last meetings conducted was on 04/03/24. 2. Fire Safety •Facility has installed self-battery back-up emergency lights at the Staircase between third and fourth floor to ground floor. •Secondary stairways are not provided to the 4th and 5th floor wherein total 79 employees are working at both floors. •Adequate firefighting equipment installed such as 15 Fire extinguishers, 6 fire alarm call points, 05 visual fire alarm, 01Fire alarm control panels, 04 Fire buckets were provided in the facility. •Evacuation map was posted in the factory. •Mock drills were organized and recorded every 02 months. Last mock drill was done on 18.03.2024 •Firefighting training was provided by db Enterprises to 20 key employees on 18/01/2024 •Monthly checking of fire-fighting equipment like fire extinguisher, hose reels, etc. were done by the facility safety In charge. Last inspection report verified of dated 16/04/2024 3. Machine & Electrical safety •All machines and electrical equipment's were maintained in good conditions. •There were competent mechanic & electricians at the site to do the electrical work. •Rubber matt were placed below the electrical panels and stitching machines. •Emergencies stop buttons were available at all the machines. •Machines or motors having pulley guards were found guarded. •Needle guards were available to all stitching machines. •No imminent safety concern observed. 4. Medical services •Facility has provided well equipped with adequate supplies 3 no. of first aid box. •Facility had trained 10 employees from Indian Red cross society on 26/11/2022. Certificates valid for 02 years. •Annual medical examination of all the employees were carried out through Govt. approved medical officer. Last medical examination was carried out in September upon hiring of new employees. Copies of health test reports were also verified. •As per the accident register no accidents occurred till date. 5. Chemical safety •No Chemical used by the facility in activities. 6.Personal Safety • PPE register & log of issue receipt was maintained by the facility. However employees working in loading unloading area found not using safety shoes, please refer NC. • Training on personnel hygiene and use of appropriate PPE's provided on 16/03/2024
Evidence examined:

•Health and Safety Policy •Fire NOC application •Stability Certificate •Industrial accident records – Updated till March 2024 •First aid training provisional certificates •Drinking Water Test report •Mock Drill records •Firefighting training record •List of fire-fighting equipment's & monthly inspection reports. •List of machineries. •Electrical inspection report •PPE register. •Training records – emergency preparedness plan, PPE, policies, health & safety, etc. •Interaction with Management and Interview with employees.
Any other comments:
None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☑ Yes ☐ No Please give details: Facility had established general health & safety policy and procedures that are fit for purpose and are communicated to workers during trainings
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: Facility includes this policy during every training.
Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☑ No Please give details: No structural additions without required permits and/or inspections, facility has obtained approved building & machinery layout plan from Chief Inspector of Factories as required by law.
Are visitors to the site informed on H&S and provided with personal protective equipment?	☑ Yes ☐ No Please give details: Facility has procedure of briefing Health & Safety instructions to visitors & has also displayed visitor safety instructions
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	☑ Yes ☐ No Please give details: No inhouse medical room and it is not a legal requirement for the factory. First aid boxes provided by the facility
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☑ Yes ☐ No Please give details: Facility had trained 10 employees from St. John's Ambulance dtd. 26/11/22, valid for 3 years.

Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☑ No Please give details: No transport facility is provided to workers
Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☑ No Please give details: Not applicable as facility does not provide accommodation to its employees
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☑ Yes ☐ No Please give details: Factory has conducted H&S risk assessments on 1.09.2023
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☑ Yes ☐ No Please give details: Facility has obtained legally required pollution consent.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☑ Yes ☐ No Please give details: Based on interaction with facility management that the facility does not use any banned chemicals and meet all the environmental standards based on customer requirement.

Non-Compliance	Evidence
[Back to findings summary]	 Employees found not wearing safety shoes.jpg

Non-Compliance	
Status	CLOSED
Reference	ZAF600465622
Clause	3 - Working Conditions are Safe and Hygienic
Issue Title	276 - Workers are not issued with appropriate Personal Protective Equipment (PPE)
Subcategory	Personal Protective Equipment/Clothing
New or carried over?	☑ New ☐ Carried Over
Resolved by audit	ZAA600061477
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	According to Section 7A (2b) of The Factories Act, 1948, Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
Explanation to the non compliance	It was noted from site tour that 05 employees working in packing , loading and unloading found not wearing safety shoes.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	It is recommended to the facility to provide safety shoes to all employees working in packing , loading and unloading
Additional comments	We have immediately provided safety shoes to employees who work in the packing, loading and unloading area.

	Verified	

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	CLOSED
Reference	ZAF600465625
Clause	3 - Working Conditions are Safe and Hygienic
Issue Title	256 - No / inadequate ventilation systems
Subcategory	Building/Site Maintenance
New or carried over?	☑ New ☐ Carried Over
Resolved by audit	ZAA600061477
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with factories rule 1948, 13. Ventilation and temperature.—(1) Effective and suitable provision shall be made in ever factory for securing and maintaining in every workroom— (a) adequate ventilation by the circulation of fresh air.
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
Explanation to the non compliance	It was noted from site tour that facility has not provided ventilation in Male toilet in 5th floor , Female toilets in 4th and 5th floor.
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	It is recommended to the facility to ensure that proper ventilation is provided in washroom
Additional comments	We have installed Exhaust fans for ventilation in Male toilet on the 05th floor and female toilets on the 4th and 5th floor. Verified

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Facility has displayed "No Child labour" board outside the Main Gate. 2. Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported. 3. Based on review of facility recruitment policy, employee's ID for age proof such as Pan Card or Aadhar card was checked by HR department prior to hiring. 4. Based on the policy review, the minimum hiring age of the facility is 18 years old. 5. The age of youngest worker found in the facility through audit process is 20 years. 6. 10 out of 10 sampled employee's personnel files were reviewed to check the copy of age proof documents.
Evidence examined:
•No child labour and child labour remediation Policy. •Age Proof records of 10 out of 10 selected samples. •Interaction with Management and Interview with employees.
Any other comments:
No

Legal age of employment:	15
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No Please give details: No Child labour hired by the facility

5 - Living Wages are Paid [Summary of Findings]
5: Compliance Requirements 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.The facility has declared no peak or lean season and has confirmed consistent production throughout the year. 2.10 employees were selected for interview. Out of which 06 employee was interviewed individually and remaining 04 employees were interviewed in 01 groups with 04 employees 3.All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found meeting the government notified minimum wages in the region. Workers were aware of the code & company social policies. 4.10 records to verify wages and working hours section were taken for 03 sampled months from the period of June 2023 to March 2024 .(Last audit was conducted on 05/05/2023) 5.The legal minimum wages applicable in Gujarat State under Zone-I with effect from 01.10.2023 to 31.03.2024 is as follows – Unskilled Labour: INR INR 12298.00 per month, Semi-Skilled Labour: INR 12558.00 per month & Skilled Labour: INR 12870.00 per month. 6.Legal minimum wages are paid to all the sampled employees; INR 14,280.00 per month was lowest paid to helper / sweeper (unskilled category) & INR 14,580.00 per month was lowest paid to tailor (skilled category) in March 2024 (most recent paid month) from the sampled employees. 7.No deductions other than legal requirement were identified in the sampled wage records. Same also confirmed from worker interviews. 8.Employees' wages are calculated on monthly basis & paid through bank transfers only on or before 7th of every month. 9.Statutory benefits like provident fund, leave with wages were paid to all the eligible employees. Employee state insurance is not applicable in this region however, facility has covered their employees under alternate insurance scheme of workmen's compensation policy. 10.Leave with wages is paid as per the factory act, 1948 i.e., one leave entitled for every 20 days worked to all employees. Facility allows leave enjoyment to all the eligible employees after following the leave application procedure. Further, facility also, extend 06 casual leave & 6 sick leave to all employees. 11.Wage slips were provided to all the employees. Verified sampled wage slips sampled employees & confirmed from worker interviews too. 12.Based on employee's interview and record review all the employees received appointment letter with written and understandable information about their employment conditions in respect to wages. 13.No inconsistency was noted between the provide records and production records and worker interviews. 14.From sampled months March 2024 (most recent paid month) , November 2023 (Random month) & August 2023 (Random month), no overtime work was done by the sampled employees.
Evidence examined:

•Wages and benefits policy •10 payroll records for March 2024 (most recent paid month), 10 payroll records for November 2023 (Random month) & 10 payroll records were reviewed for August 2023 (Random month). •All attendance records pertained to the corresponding 10 payroll records were reviewed. •Leave records were maintained as per the legal requirement. •Social security benefit like Provident Fund was extended to all the eligible employees. •Employment contracts for all employees (to examine agreed wage rates) •Pay slips of all reviewed corresponding payroll records. •List of National and Festival Holidays. •Minimum wages notification. •Bank statements of salary paid (of sampled months) & last bonus paid. •Interaction with management and Employees.
Any other comments:
None

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 473 Per Week: 2838 Per Month: 12298	Actual Per Day: 476 Per Week: 2856 Per Month: 14280	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
Wages Analysis:			
Were accurate records shown at the first request?	☑ Yes ☐ No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 payroll records for March 2024 (most recent paid month), 10 payroll records for November 2023 (Random month) & 10 payroll records were reviewed for August 2023 (Random month).		
Are there different legal minimum wage grades? If Yes, please specify all.	☑ Yes ☐ No The legal minimum wages applicable in Gujarat State under Zone-I with effect from 01.10.2023 to 31.03.2024 is as follows – Unskilled Labour: INR INR 12298.00 per month, Semi-Skilled Labour: INR 12558.00 per month & Skilled Labour: INR 12870.00 per month.		

If there are different legal minimum grades, are all workers graded and paid correctly?	☑ Yes ☐ No ☐ Not Applicable Please give details:
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☐ Meet ☑ Above
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Legal minimum wages are paid to all the sampled employees; INR 14,280.00 per month was lowest paid to helper / sweeper (unskilled category) & INR 14,580.00 per month was lowest paid to tailor (skilled category) in March 2024 (most recent paid month) from the sampled employees
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage
Bonus Scheme found: Please specify details:	Bonus Scheme found:Company has policy of bonus to be paid at the rate of 8.33 % on the minimum wages to all the company Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	Provident fund & Profession Tax
Have these deductions been made?	☑ Yes ☐ No
Please list all deductions that have been made.	1. Provident fund (12% on minimum wage) 2. Profession Tax (INR 200 only if gross wage more than 12,000)
Please list all deductions that have not been made.	None
Were appropriate records available to verify hours of work and wages?	☑ Yes ☐ No
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☑ Yes ☐ No Please give details: Confirmed form time records & worker interviews.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☑ No Please give details:
If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation ☐ Other – please give details:

Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☑ Yes ☐ No Please give details: Gujarat state government revise the minimum wages two times in a year (in the month of April & in the month of October) and the same will be paid to the employees accordingly.
Are workers paid in a timely manner in line with local law?	☑ Yes ☐ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes ☐ No Please give details: It was confirmed through verification of records and employee interaction that equal rates are being paid for equal work.
How are workers paid:	☐ Cash ☐ Cheque ☑ Bank Transfer ☐ Other

6 - Working Hours are not Excessive [Summary of Findings]
6: Compliance Requirements 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met: 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.Facility works 06 days a week in one general shift. General shift – 09:30 am to 06:00 pm, Lunch Break 30 minutes & 2 tea breaks for 15 minutes each including security staff. 2.Weekly off: Sunday for all departments. 3.All the employees are provided with one day off in every week / seven-day period. 4.Facility has installed biometric machine to record In Out time / attendance of all the employees. 5.Standard working hours are within the legal limits i.e., 08 hours duty. Worker's interview confirmed that Overtime was voluntary. No overtime hours were observed in the sampled employees records in sampled months. 6.Working hours of employee includes the break timings & as well as any trainings / committee meetings conducted in the facility. 7.10 payroll records for March 2024 (most recent paid month), 10 payroll records for November 2023 (Random month) & 10 payroll records were reviewed for August 2023 (Random month). 8. Based on review of time records, the working hours analysis is summarized as follows: Average working hours is 17.44 per week and maximum working hours 24 hours per week for the month of March 2024. No overtime performed Average working hours is 14.11 per week and maximum working hours including overtime is 34 hours per week for the month of November 2023 Average working hours is 19.05 per week and maximum working hours including overtime is 27 hours per week for the month of August 2023
Evidence examined:
•Working hours policy. •In / Out time records for 10 selected samples for each of 03 sampled payroll months. •List of holidays •Interaction with management and Employees.
Any other comments:
None

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Biometric time keeping system

Is sample size same as in wages section?	☑ Yes ☐ No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes ☐ No
Are there any other types of contracts/employment agreements used?	☐ Yes ☑ No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	☐ Yes ☑ No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)
Is this allowed by local law?	☑ Yes ☐ No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	☐ Yes ☑ No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	No overtime hours worked by any of the sampled employee in any of the sampled month.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: No overtime hours worked by any of the sampled employee in any of the sampled month.
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	☑ Yes ☐ No ☐ Conflicting Information Please give details: Confirmed from worker interviews & record review.
Overtime premium	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	☐ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium Please give details: No overtime hours worked by any of the sampled employee in any of the sampled month.
Is overtime paid at a premium?	☐ Yes ☑ No
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.	☐ No ☐ Consolidated pay ☐ Collective Bargaining agreements ☑ Other
Please give details	No overtime hours observed in the sampled employees sampled month time records. However, as per policy facility will pay 200% of ordinary rate of wages as per the law.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☑ Other reasons (please specify)
Please give details	No overtime hours observed in the sampled employees sampled month time records. However, as per policy facility will pay 200% of ordinary rate of wages as per the law.
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	No overtime hours observed in the sampled employees sampled month time records. However, as per policy facility will pay 200% of ordinary rate of wages as per the law.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☑ Yes ☐ No

7 - No Discrimination is Practiced [Summary of Findings]
7: Compliance Requirements 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
It was noted from review of wage records and employees' interview that, 1. Based on review of wage records and employee's interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement. 2. Mr. Jayashree Patadia – HR Manager is responsible for the investigation and disposal of discrimination case. 3. Based on wage records review, the facility provides the same pay for employees doing same work of similar nature.
Evidence examined:
Personal File Details: Anti-discrimination policy Training records The hiring and termination procedure, leave application records
Any other comments:
None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 30.0%	Female: 70.0%	
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
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?	☐ Hiring ☐ Promotion	☐ Compensation ☐ Termination or retirement	☐ Access to training ☑ No evidence of discrimination found
Please give details	Not applicable		
Professional Development			
What type of training and development are available for workers?	Facility conducts various trainings on ETI base code, Health & Safety, social policies, material handling, which develop the employee's skill.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes ☐ No		

8 - Regular Employment Is Provided [Summary of Findings]
8: Compliance Requirements 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment. Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements. 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation. 8.5 Employment agencies must only supply workers registered with them. 8.6 Workers pay no recruitment fee at any stage of the recruitment process. 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Based on record review and worker interviews appointment letters were issued to all 10 out of 10 sampled employees. 2. Employment terms & conditions in the appointment letters found to be as per the legal requirement. 3. Based on interaction with the facility management, it was noted all the employees are hired directly only; No temporary workers, part time workers, seasonal workers & casual workers were engaged. 4. Facility has no migrant workers. 5. Based on interaction with employees, no recruitment fees are required at any stage of the recruitment. 6. Facility is paying benefits to the employees which they are legally entitled to.
Evidence examined:
•Facility hiring policy. •Appointment letters with terms and conditions for 10 out of 10 selected samples. •Salary and other benefit records. •Interaction with management and Employees.
Any other comments:
None

Responsible Recruitment	
All Workers	
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	☑ Terms & Conditions presented ☑ Understood by workers ☑ Same as actual conditions
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No

Migrant Workers	
Type of work undertaken by migrant workers:	Not applicable as no migrant workers hired by the facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	☐ Yes ☑ No Please give details: Not applicable as no migrant workers hired by the facility.
Is there any observation on this finding?	No, Not applicable as no migrant workers hired by the facility.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	☐ Yes ☑ No
Non-employee workers	
Recruitment Fees	
Are there any fees?	☐ Yes ☑ No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	No agency workers hired by facility.
Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☑ No
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No
Is there a legal contract agreement with all agencies?	☐ Yes ☐ No Please give details: No agency workers hired by facility.
Does the site have a system for checking labour standards of agencies?	☐ Yes ☑ No Please give details: No agency workers hired by facility.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	☐ Yes ☑ No Please give details: No Contract workers hired by facility.
Do all contractor workers understand their terms of employment?	☐ Yes ☑ No Please give details: No Contract workers hired by facility.

Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	CLOSED
Reference	ZAF600465623
Clause	8 - Regular Employment Is Provided
Issue Title	525 - Inadequate contracts in place, i.e. missing critical elements such job description, wages (regular and overtime), hours of work (including overtime), notice period etc.
Subcategory	Terms of Employment/Engagement
New or carried over?	☑ New ☐ Carried Over
Resolved by audit	ZAA600061477
Root cause	☐ Training ☑ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	According to Schedule I-B of the Model Standing Orders on additional items applicable to all industries: (1) SERVICE RECORD: Matters relating to service card, token tickets, certification of service, change of residential address of workers and record of age. (i) Service Card.- Every industrial establishment shall maintain a service card in respect of each workman in the form appended to these orders, wherein particulars of that workman shall be recorded with the knowledge of that workman and duly attested by an officer authorised in this behalf together with date. (ii) Certification of service.- (a) Every workman shall be entitled to a service certificate, pacifying the nature of work (designation) and the period of employment (indicating the days, months, years), at the time of discharge, termination, retirement or resignation from service;
ETI code	8.7 - Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.
Explanation to the non compliance	It was noted from review of records of 10 sampled employees , facility has not mentioned any clause regarding notice period in the employment contract for the employees who want to resign from the facility.
Follow up method	☐ Follow up audit ☑ Desktop audit

Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other	
Actions	It recommended to the facility to ensure that to mention clause regarding notice period in the employment contract for the employees who want to resign from the facility.	
Additional comments	We have updated the employment contract regarding notice period for our employees. Verified	

8A - Sub–Contracting and Homeworking [Summary of Findings]
8A: Compliance Requirements 8.A.1 There should be no sub–contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
•Facility does not carry any sub-contracting processes or engage any home workers.
Evidence examined:
•Inward / Outward material records, Invoices. •Interaction with management & employee interview
Any other comments:
None

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

9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]
9: Compliance Requirements 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Facility has formed prevention of sexual harassment committee (POSH for female employees) for reporting any issues. 2. Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility. 3. Meetings were held every months . In the of sexual harassment committee. Last meeting was conducted on 03.01.2024. External member Ms. Kashmira Upadhyay (Prabhat Education Charitable Trust) is appointed in the committee as required under law. 4. From committee minutes of meeting no complaints were raised by the workers. Also, verified log register of suggestion & complaint box.
Evidence examined:
•Facility policy on sexual harassment prevention at workplace. •Minutes of meeting of works committee & prevention of sexual harassment committee. •Interaction with management and Employees.
Any other comments:
None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☑ Yes ☐ No Please give details: Facility has open door policy, works committee for any complaints/suggestions. Also, facility has formed Prevention of sexual harassment committee for female employees to report any grievances & complaints.
If yes, are workers aware of these channels and have access? Please give details.	Yes, workers are aware of these channels & committee representatives, confirmed from worker interviews. Facility has also displayed committee members list in the facility premises
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	1.Reporting directly to committee representative 2.Suggestion / complaint box 3.Open door policy
Which of the following groups is there a grievance mechanism in place for?	☑ Worker ☑ Communities ☑ Suppliers ☐ Other
Please provide grievance mechanism details	Facility has effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Committee, meetings etc. Suppliers & business partners are communicated with ETI base code

Are there any open disputes?	☐ Yes ☑ No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☑ Yes ☐ No Please give details:
Is there a published and transparent disciplinary procedure?	☑ Yes ☐ No Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes ☐ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

10A - Entitlement to Work and Immigration [Summary of Findings]
10A: Compliance Requirements 10.A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Based on the review of employee attendance records and employee's interview, the facility has not employed any contract workers, migrant workers, foreign nationals, etc. 2. Based on the review of employee personal files, all the employees are holding the legal rights to work
Evidence examined:
•Hiring procedure. •10 out of 10 sampled employee's personnel files. •Interaction with Management and Employees.
Any other comments:
None

10B4 - Environment 4–Pillar [Summary of Findings]
10B4: Compliance Requirements 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details). 10.B4.7 Businesses shall make continuous improvements in their environmental performance. 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10.B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance. 10B4: Guidance for Observations 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations. Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Ms. Jayashree Patadia – HR Manager is responsible for all environmental related issues. 2. Factory is aware of the legal environmental requirements. 3. Factory has conducted necessary ambient air, noise level, at regular intervals & results were within limits. 4. The last ambient air, noise level test was conducted on 25.11.2023 through Prism Test and measure. 5. The land on which facility is operating is industrial area & does not have any adverse impact on environment in terms of land acquisition. 6. Facility does not produce any hazardous waste like Sludge, used oil etc
Evidence examined:
•Facility environmental policy. •Ambient air quality, noise level monitoring test report. •Environmental risk assessment report. •Waste disposal records. •List of chemicals & MSDS. •Interaction with management and Employees.
Any other comments:
Please note : SAQ was 100% completed by the Facility and it was verified by auditors, however due to technical glitch on Sedex Portal of facility, they were not able to submit the SAQ, thus Observation not raised.

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Ms. Jayashree Patadia – HR Manager
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: Facility has carried out environmental impact risk assessment dated 01.09.2023
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	☐ Yes ☑ No Please give details: No such certification obtained by the facility
Does the site have an Environmental policy?	☑ Yes ☐ No
If yes, is it publicly available?	☑ Yes ☐ No
If yes, does it address the key impacts from their operations and their commitment to improvement?	☑ Yes ☐ No Please give details: Facility has carried out risk assessment dated 01.09.2023
Does the site have a Biodiversity policy?	☑ Yes ☐ No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	☐ Yes ☑ No Please give details: Not applicable
Have all legally required permits been shown?	☑ Yes ☐ No Please give details: Not applicable as fall under exemption category as per Gujarat Pollution Control Board
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☐ Yes ☐ No ☑ Not Applicable Please give details: No hazardous chemical used by the facility
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☑ Yes ☐ No Please give details: Facility has system for managing client's requirements
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☐ Yes ☑ No Please give details: Facility has planned & has targets in place for reduction of electricity 5%.

Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☑ Yes ☐ No Please give details: Facility is exempted for consent to operate, thus waste recycling is not applicable, however facility only generate chindi waste from the cutting and stitching process, which they have sold to vendor for reprocess. Records of sell maintained.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	☑ Yes ☐ No Please give details: Facility monitors water consumption on monthly basis. Similarly, energy meters are installed & monitoring of consumption is documented.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☐ Yes ☑ No Please give details: Not applicable	
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	62259	22270
Renewable Energy Usage: Kw/hrs	9635	2700
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Municipality AMC	Municipality AMC
Water Volume Used	2555	517
Water Discharged	Dain to AMC	Drain to AMC
Water Volume Discharged	2427	490
Water Volume Recycled	0	0
Total waste produced	23900 kgs	5500 kgs
Total hazardous waste produced	0	0
Waste to recycling	0	0
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	4500000	1125000

10C - Business Ethics – 4-Pillar Audit [Summary of Findings]
10C: Compliance Requirements 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements. 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice, 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area. 10C: Guidance for Observations 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.Ms. Jayashree Patadia – HR Manager is responsible for compliance related to business ethic section. 2.The SAQ was completed by the site. 3.Facility has documented policy on Business ethics and anti-corruption. 4.The facility follows requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 5.Facility has effective mechanism of whistle blowing on reporting unethical practices to the management. 6.Based on audit process and review of records, it was noted that the facility has not been recently subject to any fines/prosecutions for non-compliance to Business Ethics regulations. Hence there is no sustainable corrective actions implementation required. 7.The facility has communicated business ethics policy to its suppliers & labour contractors 01.04.2024
Evidence examined:
•Policy on business ethics, anti-bribery, etc. •Confidential reporting policy and procedure. •Interaction with management and Employees.
Any other comments:
None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	☑ Internal Policy ☑ Policy for third parties including suppliers Please give details: Policy is documented and displayed.
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☑ Yes ☐ No Please give details: Policy is documented, and it has communicated in internal training. Verified training record dated 22.12.2023
Is the policy updated on a regular (as needed) basis?	☑ Yes ☐ No Please give details: Regular review of policy is done by Management. Last review was done on 01.03.2024
Does the site require third parties including suppliers to complete their own business ethics training	☑ Yes ☐ No Please give details: The facility has communicated business ethics policy to its suppliers & labour contractors. Verified ethics policy communication to suppliers on 01.04.2024

Attachments

 Personal belonging storage area.jpg	 Pressing section.jpg
 Material storage area.jpg	 Material storage area _ Mezannine.jpg
 No child labour board dsiplayed.jpg	 Name of the facility.jpg

 Overview of the building.jpg	 Packing material store.jpg
 Manual Call point.jpg	 Manual Call point in first floor.jpg
 Idle sewing machine marked.jpg	 Gender based toilet marked.jpg

 Head protection spunge provided for stoarge area wherein height is less.jpg	 Goods Lift.jpg
 Fire Extinguishers with working instructions.jpg	 Lunch Room.jpg
 Hand wash facility.jpg	 Fire alarm call point with alarm.jpg

Evacuation Map displayed.jpg


Finished goods area.jpg

Emergency Light.jpg


ETI base code.jpg


Employees found not wearing safety shoes.jpg

First aid box.jpg

 Cutting section.jpg	 Drinking water area.jpg
 Creche area.jpg	 Clean Urinal.jpg
 Clean Toilet.jpg	 Aisle marked ground floor.jpg

 Checking section.jpg	 Alarm Panel.jpg
 Drinking water point.jpg	 Electrical Panel.jpg
 Air Cooler provided in first floor.jpg	 Sewing section Ground floor.jpg

 Suggestion Box.jpg	 Shift timing dsiplayed.jpg
 Abstract displayed.jpg	 Sewing section.jpg
CAPR_ZAA600061477_Signed.pdf	

For more information visit: Sedexglobal.com

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

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

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

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

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

Click here for Auditors:

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

SMETA®

Sedex Members Ethical Trade Audit

Sedex Members Ethical Trade Audit Report

Version 7

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
   - 0: Enabling accurate Assessment
   - 1: Employment is Freely Chosen
   - 1.A: Responsible Recruitment & Entitlement to Work
   - 2: Freedom of Association and Right to Collective Bargaining are Respected
   - 4: Child Labour Shall Not be Used
   - 5: Legal Wages are Paid
   - 5.A: Living Wages are Paid
   - 6: Working Hours are Not Excessive
   - 7: No Discrimination is Practiced
   - 8: Regular Employment is Provided
   - 8.A: Sub-contracting and Homeworkers are Used Responsibly
   - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
   - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
   - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
   - As 2-pillar
2. Health & Safety Code Area
   - As 2-pillar
3. Environment Code Area:
   - 10.A: Environment 2-Pillar
   - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
   - 10.C: Business Ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC1070289	**Auditor company name**	Intertek India
Date of audit	2024-11-30	**Audit conducted by**	Sedex member
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Site details

Sedex site reference	ZS1045699	**Site name**	NORQUEST BRANDS PRIVATE LIMITED
Business name	Norquest Brands	**Site address**	380008 A/ 1-4, MOHAN ESTATE OPP. ANUPAM THEATER, KHOKHRA, AHMEDABAD, IN
Site phone	09377732800	**Site email**	compliance@norquestbrands.com

Audit parameters

Time in and out	Day 1	
	In	09:30
	Out	16:30
Audit type	Periodic	
Was the audit announced?	Semi announced	
Was the Sedex SAQ available for review?	No	
Who signed and agreed CAPR?	Ms Jayshri Patadiya / HR Manager	
Any conflicting information SAQ/Pre-Audit Info	No	
Is further information available?	No	

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No Union on site		
Reason for absence during the audit	No Union on site		
Reason for absence at the closing meeting	No Union on site		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. 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.		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	None		
Lead auditor	Mala Biredar	**APSCA Number**	21700385
Additional auditor	Vinod Vasantrao Gajare	**APSCA Number**	32200385
	Mrinmayee Mayekar	**APSCA Number**	32200998
Date of declaration	2024-11-30		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Ms Jayshri Patadiya
Title	HR Manager
Date of declaration	2024-11-30

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	§1	NC ZAF600734764
	3.K Ensure that all premises are safe and hav...	§2	NC ZAF600734765

Local law issues

§1	In accordance with Factories Act, 1948. Section 7A: General duties of the occupier - (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.(2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include - (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health; (b) the arrangement in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances; (c) the provision of such information, instruction, training and supervisions as are necessary to ensure the health and safety of all workers at work;
§2	In accordance with The Factories Act 1948, section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include - a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	✓	✓	✓	ⓘ
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	✓
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓
10.C. Business ethics	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

Site details

Company and site details

Sedex company reference	ZC1070289	
Sedex site reference	ZS1045699	
Company name	Norquest Brands	
Business ownership type	GOODS	
Site name	NORQUEST BRANDS PRIVATE LIMITED	
Site name in local language		
GPS location	**GPS address**	A/1-4, Mohan Estate, Opp. Anupam Cinema ,Khokhra, Ahmedabad, India
	Coordinates	Not available
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Ms Jayashri Patadiya
	Job title	HR Manager
	Phone number	09377732800
	Email	compliance@norquestbrands.com
Applicable business and other legally required business license numbers and documents	Factory License No. 28775, Approved manpower 250, Approved Electrical Power 100 HP (Valid Up to 31.12.2026)	

Site activities

Site function	Factory Processing/Manufacturer

Site activities

Site activities	**Primary**	Manufacture of luggage, handbags and the like, saddlery and harness
	Secondary	
	Other	
Product type	Manufacturing of Cotton Bags	
Process overview	(Raw Material (Cotton Fabric)- Cutting-Inspection - Stitching-Inspection-ironing Inspection Finishing-Packing Dispatch)	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	$4000m^2$	
Building 1	**Last construction works on site**	2003
	If building is shared, provide details	Not applicable
	Number of floors	3
	Description of floor activities	Ground floor - Store (Fabric + Accessories), Cutting, Inspection and Stitching machines storage area. First floor - Stitching and In Line Inspection area Second floor - Stitching, Pressing, and Final Inspection Periphery - Security, Parking, Lunch room, Creche, Toilets, waste storage area and Electrical Panel room
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	

Site scope

Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable No worker transport provided

Work patterns

Approximate workers on site per month (% of peak)	**January**	90-95%	**February**	90-95%
	March	90-95%	**April**	90-95%
	May	90-95%	**June**	95-100%
	July	95-100%	**August**	75-90%
	September	90-95%	**October**	90-95%
	November	75-90%	**December**	90-95%
Is there any night or back shift work at the site?	No			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	Yes Site is located in industrial estate and has no negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community

Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes Site has conducted Human Rights Impact Assessment on 01/01/2024.

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	15	*(15.3%)*	83	*(84.7%)*	-	-	98	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	15	*(15.3%)*	83	*(84.7%)*	-	-	98	*(100%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	0	-	0	-	-	-	0	(0%)
International migrant workers	0	-	0	-	-	-	0	(0%)
Total migrant workers	0	-	0	-	-	-	0	(0%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	No migrant employees.

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	15	(15.3%)	83	(84.7%)	-	-	98	(100%)
15 - 17 years old	0	-	0	-	-	-	0	(0%)
Under 15 years old	0	-	0	-	-	-	0	(0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Indian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	15%	83%	-	98%

Workers by remuneration type

	Men		Women		Other		Total	
Workers paid per unit (piece rate)	0	-	0	-	-	-	0	(0%)
Workers paid based on a mix of 'piece work' and hourly rate	0	-	0	-	-	-	0	(0%)
Workers paid hourly / daily rate	0	-	0	-	-	-	0	(0%)
Salaried workers	15	(15.3%)	83	(84.7%)	-	-	98	(100%)

* % of total workforce

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	15	(15.3%)	83	(84.7%)	-	-	98	(100%)
Other	0	-	0	-	-	-	0	(0%)

* % of total workforce

If other payment cycle entered, please provide details	No other payment cycle.

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	2	(66.7%)	1	(33.3%)	-	-	3
Supervisors or team leaders	4	(80%)	1	(20%)	-	-	5
Administrative staff	1	(50%)	1	(50%)	-	-	2

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	4 group of 5 employees.
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes
Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) None / no negative comments reported.
What did the workers like the most about working at this site?	Job security Freedom of movement Grievance mechanisms Pay
Additional comments	Workers are satisfied with the working hours and there is no overtime hours practice. Workers are free to leave facility after the working hours.
Attitude of workers' committee/union representatives	Workers of grievance committee found positive.
Attitude of managers	The facility management showed a positive attitude towards this audit during the whole audit process. At the end of the audit, all the non-compliances were accepted by the facility and further the facility management stated that they will take corrective actions on the non- compliances noted during the audit.

Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	1	15	-	16

Workers interviewed by group/individual

Workers interviewed individually	5	5	-	10

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	-
Last full calendar year (2023)	-	-	-	-
Previous full calendar year (2022)	-	-	-	-

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	-	-	-	-
Last full calendar year (2023)	-	-	-	-
Previous full calendar year (2022)	-	-	-	-

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?	Yes Facility has maintained accident register.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total

Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	6.0%	18.0%	-	24.0%
Last full calendar year (2023)	6.0%	18.0%	-	24.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -The facility has allowed the auditor to conduct and complete the audit without any obstruction to requested documents, interviewees and the facility itself (including outbuildings and accommodation). -Facility has shown authentic & accurate records. Facility has extended complete transparency towards to audit process. -Facility did not engaged in any of the audit integrity issue like bribes or threatening to the auditor, nor in any way induce the auditor to be dishonest. -Facility provided accurate site description and Sedex site profile declared prior to or during the audit through SAQ. -Facility has documented human rights policy endorsed by the Ms. Jayashri Patadiya - HR Manager. -Facility has designated Ms. Jayashri Patadiya - HR Manager. responsible for implementing standards on human rights. -No human rights violation was observed in the facility. Same also confirmed from worker interviews. -Facility has identified its stakeholders & their salient issues. Also, facility has evaluated direct, indirect & adverse impact on human rights through its stakeholders & its process. -Facility provides regular trainings to all the employees in batches / groups on ETI base code & social policies covering human rights. -Facility has communicated ETI base code & social policies to its stake holders like suppliers & customers. Evidence Examined: -Policy & procedures on Anti-bribery, Anti-corruption & Human rights. -Appointment letter of Ms. Jayashri Patadiya - HR Manager. as responsible person for overall social compliance. -ETI base code / social policies training record dated 18th to 20th November 2024 to all the employees. -ETI base code / social policies communication records of suppliers & customer dated 08.07.2024. -Management interaction & worker interviews.

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that no forced, bonded, involuntary or prison labour is employed at site & its supply chain. -Facility has a policy which prohibits forced labour, and this was available for review. -There was a formalised application procedure & recruitment policy which states that workers must present their identity cards for proof of age but only copies to be kept in the personnel files and the originals were given back to the workers. -The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. No bonds signed by any of the sampled workers. -The factory did not require any payment for work tools, PPE, Identity card, trainings, etc. -No loan schemes are functional in the facility. Same confirmed from worker interviews. No wage retention observed from audit process. -Facility has installed CCTV however not or the purpose of controlling or intimidating workers. -There is no evidence of forced, bonded, involuntary or prison labour in the factory. Evidences Examined: -Facility policy on no forced labour & no bonded labour. -Personnel files including application forms & appointment letters for 26 out of 26 sampled employees. -Wage records & bank statements. -Full & Final Settlement & resignation records. -Time records. -Management interaction & worker interviews.

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure compliance with this code. -Based on the review of employee attendance records and employee's interview, the facility has not employed any national migrant workers, foreign nationals, etc. -Based on the review of employee personal files, all the employees are holding the legal rights to work in country. -Facility has a system to review original identity documents of all the employees prior to recruitment to confirm its nationality. Facility maintains copy of the verified identity document in the employees personal files. -As per facility hiring policy, employees not need to pay any recruitment fees and related costs. Evidence Examined: -Policy & procedure on hiring & recruitment. -26 out of 26sampled employee's personnel files. -Management interaction & Worker interviews.

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
Were recruitment fees or costs identified during worker interviews?	No Workers do not pay any recruitment fees or costs

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that 'Freedom of Association & Right to Collective Bargaining' is respected by the management. -Facility encourages and respects all employees' rights to join union freely & legally. Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision. -No labour union exists in the facility as legally not mandatory. However, facility has formed works committee with equal representatives of 06 members (01 staff and 05 workmen) from staff & workmen. Meeting is held every two months. Verified minutes of meeting. Facility displays notice of committee meetings on notice board. -Worker representatives are appointed in committee through appropriate election procedure amongst all the employees inline with the legal requirement. -All the committee meetings are conducted during regular work hours. -Facility also has open door policy wherein any employee can directly approach the management & raise his concern. -Facility has installed suggestion boxes at accessible location where employees can share their concerns anonymously. -There was no evidence of suppression of employees' rights. -Facility has displayed list of works committee members at the notice board. Evidence examined: -Policy & procedures on freedom of association. -Minutes of meeting of works committee record dated 18.11.2024 -Works committee elected representative election record dated 05.06.2023. -Log register of suggestion box & complaint box. -Management interaction & worker interviews.

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Not Applicable
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements however gaps were identified in this area.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	§1	NC ZAF600734764
	3.K Ensure that all premises are safe and hav...	§2	NC ZAF600734765

Systems and evidence examined to validate this code section	1. Ms. Jayashri Patadiya - HR Manager is responsible to ensure a healthy and safe work environment in the facility. 2. The facility has established General health and safety policy, occupational health and safety policy and emergency evacuation procedure. 3. Facility has provided 03 First Aid Boxes throughout the facility along with In house in-house trained 14 first aiders. 4. Facility has established Hazard and Identification Risk Assessment for all processes was reviewed on dated 02-01-2024. 5. Facility has provided training to 14 employees in rendering first aid treatment dated 29-08-2024. through M/s Indian Red cross society and certificates of training valid for 1 year from date of training imparted. 6. Facility has provided clean and potable drinking water to all the employees free of cost. Latest test was conducted through Prism test and measure pvt ltd on 26/07/2024. 7. Facility has provided accessible and functional fire-fighting equipment (35 fire extinguishers, 6 Manual call points with 6 Hooters and 1 Visual Fire Alarm, 8 Emergency Lights, 4 Hydrant Valves with 4 Hose Reels, Sprinklers – 5 and 6 Smoke Detectors. Further based on the review of fire extinguishers, fire alarms, Hydrants, Hoses and Emergency lights service records, facility conducts inspection for firefighting equipment monthly basis externally. Last inspection was conducted dated 16/10/2024 from M/s Fire Depot agency. 8. Facility has conducted Health and Safety and periodic firefighting training for all employees in separate batches. Last trainings were done on 24-06-2024. Total participants were range between 60 in each training including staff and workers. 9. Facility has provided appropriate and relevant personal protective equipment like, hand gloves, respiratory masks, Safety Belts, Head Caps, Aprons and safety shoes at free of cost to the employees. 10. Facility has conducted mock drills once in two months covering all the employees working in day shifts. Last drill was conducted on 24-06-2024 with 60 employees. 11. Facility has formed Health and Safety committee which consists of 05 members (1 from management and 4 workmen). Meeting is held once in three months. Last committee meeting was conducted on 18-11-2024. The topics covered were general health and safety issues 12. Facility has obtained Approved Plan on dated 16/09/2023 and stability certificate on dated 27-10-2023 . 12. All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards. Chemical safety 13. No Chemical is used in the facility except machine oil. Machine safety 1. Written procedures found established by facility to operate a machinery 2. Required Personal Protective Equipment's are provided to employees operating machineries 3. Danger signages are marked and identified on the machineries 4. Emergency buttons are marked on all machineries 5. Safety guards were provided to all machineries 6. Standard operating procedure and machine safety trainings were provided to all employees at regular intervals 7. Hazard and Risk analysis has been performed by facility for all machineries and utilities. 8. Facility has preventive and break down maintenance. Last maintenance conducted on 01-11-2024. 9. Facility has conducted testing of Pressure vessels and Goods lift from competent agency MM machinery pvt ltd on dated 25-06-2024. Evidence Examined: 1. Factory Plan Layout no – Amended Approved Building Layout plan with Plan # DISH/F-PLN/3923 dated 16/09/2023 2. Stability Certificate dated 27-10-2023 3. Minor Injury records – Updated till November 2024. 4. First Aid Training records 5. Firefighting Training records Mock drill records.

7. Drinking Water Test report
8. Interaction with Management and Interview with employees.
9. Health and safety policy
10. Health and safety manual
11. Hazard Identification and Risk Analysis (HIRA)
12. Health and safety committee minutes
13. Fire Fighting systems maintenance records
14. Pressure vessels and Goods lift inspection record

Findings: non-compliances

ZAF600734764 | Non-compliance | Due 2025-01-12

Code area
3 Working conditions are safe and hygienic

Workplace requirement
3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Issue title
278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Description
It was noted from site tour that employees (10) working on sewing machine in second first floor , found not wearing face mask , further employees(04) sitting next to overlock machine operators found not wearing face mask.

Corrective and preventative actions
It is recommended to the facility to ensure that employees are wearing appropriate mask

Local law reference
In accordance with Factories Act, 1948. Section 7A: General duties of the occupier - (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.(2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include - (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health; (b) the arrangement in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances; (c) the provision of such information, instruction, training and supervisions as are necessary to ensure the health and safety of all workers at work;

Status
Closed (2025-01-06)*

Time given to resolve
30 days

Verification method
Desktop audit

Area of non-compliance/non-conformance
Local law
Base code

Evidence

Employees around overlock operators found not wearing mask.jpg

employees found not wearing mask.jpg

* PDF generated at 16:59 (UTC) on 25 Feb 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600734765

Non-compliance

Due 2025-02-11

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.

Issue title

261 - Premises require minor repairs that may affect personal safety (e.g. missing handrails)

Description

During the site tour, it was observed that the railing on the third floor does not meet the appropriate height requirements, posing a potential fall hazard, third floor is used for storage of finished goods and other materials.

Corrective and preventative actions

It is recommended to the facility to ensure that railing is provided to handrail.

Local law reference

In accordance with The Factories Act 1948, section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include - a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

Evidence

Railing of less height.jpg

Status

Closed (2025-01-06)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

* PDF generated at 16:59 (UTC) on 25 Feb 2025. View this finding on the Sedex platform for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No structural additions in the building, hence not applicable.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that no child / underage workers are employed at site & their supply chain. -Facility has displayed "No Child Labour" board outside the Main Gate. -Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported. -Based on review of facility recruitment policy, employee's ID for age proof such as Pan Card or Aadhar card was checked by hiring team prior to hiring. -Facility has documented No Child Labour policy & as per review of policy, the minimum hiring age of the facility is 18 years old. -The age of youngest worker found in the facility through audit process is 19 years. -26 out of 26 sampled employee's personnel files were reviewed to check the copy of age proof documents. Evidence examined: -Policy on no child labour & child labour remediation. -Personal files for verification of age proof records of 26 out of 26 selected samples. -Management interaction & worker interviews.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	100%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law. -26 sampled employees were selected for interview. Out of which 20 employees were interviewed individually & remaining 06 employees were interviewed in 04 group of 05 employees in each group. -All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found meeting the government notified minimum wages in the region. -From last 12 months, 26 sampled employee's wages & working hours records were verified for randomly selected 03 sampled months i.e., October 2024, April 2024 & November 2023. -The legal minimum wages applicable in Gujarat with effect from 31/10/2024 to 31/03/2025 is Unskilled - INR 14,610 per month, Semiskilled - INR 14,910 per month and Skilled - INR 15,270 per month. -Legal minimum wages were paid to all the sampled employees; INR 14,700.00 per month was lowest paid to packing worker (unskilled category), & INR 15,300.00 per month was lowest paid to sewing operator (skilled category) in October 2024 from the sampled employees. -Wage slips were provided to all the employees. Verified sampled wage slips & confirmed from worker interviews too. -Employee provident fund benefit & employee state insurance scheme benefit is extended to all the eligible employees. Contribution remittance was deposited on time. -Employee state insurance scheme is not applicable in this region however facility has obtained valid workmen's compensation policy. -Employees' wages are calculated on monthly basis & paid through bank transfers only. -Statutory benefits like bonus & leave with wages were also provide to all the eligible employees. Bonus is calculated at 8.33 % of the minimum wages and paid during Diwali festival. Leave with wages benefit is extended to all the eligible employees as per the law i.e., 1 day for every 20 days worked. Further, 07 casual leaves are provided to all the employees. -Based on employee's interview and record review all the employees received appointment letter with written and understandable information about their employment conditions in respect to wages. -No inconsistency was noted between the provide payroll records, worker interviews, production records & broken needle records. -Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules. -From sampled months of October 2024, April 2024 & November 2023, regular hours were within the legal limits in all the sampled employees time records. Facility has worked overtime hours in only October 2024 however they were within the legal limits of 2 hours per day & 12 hours per week. -Full & final settlement records verified for 02 sampled left employee. Evidence Examined: -Wages and benefits policy. -26 sampled payroll records for October 2024 (most recent paid month), 26 sampled payroll records for April 2024 (random month) & 26 sampled payroll records were reviewed for November 2023 (random month). -All attendance records pertained to the corresponding 26 sampled payroll records were reviewed. -Employee provident fund remittance challans for 03 sampled months. -Leave with wage register for year 2023 & 2024. -Employment contracts for all 26 sampled employees (to examine agreed wage rates). -Pay slips of all reviewed corresponding payroll records. -List of national & festival holidays. -Minimum wages notification. -Bank statements of salary paid (of 3 sampled months) & bonus paid. -Management interaction & worker interviews.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	48.0
	Max hours per month	0.0
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	0.0

Actual overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	0.0
Minimum legal wage	Min per hour	0.0
	Min per day	0.0
	Min per week	0.0
	Min per month	14610.0
Actual minimum wage	Actual per hour	0.0
	Actual per day	0.0
	Actual per week	0.0
	Actual per month	14700.0
Minimum legal overtime wage	Min per hour	0.0
	Min per day	0.0
	Min per week	0.0
	Min per month	0.0
Actual minimum overtime wage	Actual per hour	122.5
	Actual per day	980.0
	Actual per week	0.0
	Actual per month	0.0

Wage analysis

Number of workers' records checked	26
Provide the date and details of the records	26 records of wages and working hours from 03 sampled months, October 2024 (Current month), November 2023 (Random month) and April 2024 (Random month) from the period of November 2023 to October 2024.
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes The legal minimum wages applicable in Gujarat with effect from 31/10/2024 to 31/03/2025 is Unskilled - INR 14,610 per month, Semiskilled - INR 14,910 per month and Skilled - INR 15,270 per month.

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100.0% of workforce earning above minimum wage
Are there any bonus schemes used?	Yes Bonus records verified for the year 2023-2024 which was paid at 8.33% of minimum wages
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law. -26 sampled employees were selected for interview. Out of which 20 employees were interviewed individually & remaining 06 employees were interviewed in 04 group of 05 employees in each group. -All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found meeting the government notified minimum wages in the region. -From last 12 months, 26 sampled employee's wages & working hours records were verified for randomly selected 03 sampled months i.e., October 2024, April 2024 & November 2024. -The legal minimum wages applicable in Gujarat with effect from 31/10/2024 to 31/03/2025 is Unskilled - INR 14,610 per month, Semiskilled - INR 14,910 per month and Skilled - INR 15,270 per month.. -Legal minimum wages were paid to all the sampled employees; INR 14,7000.00 per month was lowest paid to packing worker (unskilled category), INR 15,300.00 per month was lowest paid to sewing operator (skilled category) in October 2024 from the sampled employees. -Wage slips were provided to all the employees. Verified sampled wage slips & confirmed from worker interviews too. -Employee provident fund benefit & employee state insurance scheme benefit is extended to all the eligible employees. Contribution remittance was deposited on time. -Employee state insurance scheme is not applicable in this region however facility has obtained valid workmen's compensation policy. -Employees' wages are calculated on monthly basis & paid through bank transfers only. -Statutory benefits like bonus & leave with wages were also provide to all the eligible employees. Bonus is calculated at 8.33 % of the minimum wages and paid during Diwali festival. Leave with wages benefit is extended to all the eligible employees as per the law i.e., 1 day for every 20 days worked. Further, 07 casual leaves are provided to all the employees. -Based on employee's interview and record review all the employees received appointment letter with written and understandable information about their employment conditions in respect to wages. -No inconsistency was noted between the provide payroll records, worker interviews, production records & broken needle records. -Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules. -From sampled months of October 2024, June 2024 & January 2024, regular hours were within the legal limits in all the sampled employees time records. Facility has worked overtime hours in October 2024, however they were within the legal limits of 2 hours per day & 12 hours per week. -Full & final settlement records verified for 01 sampled left employee. Evidence Examined: -Wages and benefits policy. -26 sampled payroll records for October 2024 (most recent paid month), 26 sampled payroll records for April 2024 (random month) & 26 sampled payroll records were reviewed for November 2023 (random month). -All attendance records pertained to the corresponding 26 sampled payroll records were reviewed. -Employee provident fund remittance challans for 03 sampled months. -Leave with wage register for year 2023 & 2024. -Employment contracts for all 52 sampled employees (to examine agreed wage rates). -Pay slips of all reviewed corresponding payroll records. -List of national & festival holidays. -Minimum wages notification. -Bank statements of salary paid (of 3 sampled months) & bonus paid. -Management interaction & worker interviews.

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible for ensuring compliance with regular and overtime hours as per law. -Facility has documented policy on regular working hours & overtime. -The employees work for 6 days a week in four shifts. Permanent employees works in General shift : 09:30am to 06:00pm Lunch Break : 30 minutes (staggered) Tea Break : 15 minutes twice in a day (staggered) Security shift 1 : 08:00am to 04:00pm Security shift 1 : 04:00pm to 12:00pm Weekly Off: Sunday for general shift employees and staggered for rest of the shifts. -Sunday is weekly holiday for all the employees except security guards. Security guards are provided with staggered weekly off. All the employees are provided with one day off in every week /seven-day period. -Facility has installed biometric attendance machine to record In Out time / attendance of all the employees on daily basis. Employee themselves record In / Out time through fingerprint scan. -Standard working hours were within the legal limits i.e., 08 hours per day & 48 hours per week. Facility has worked overtime hours in all the sampled months however they were within the legal limits of 2 hours per day & 12 hours per week. Further, worker's interview confirmed that overtime if required will be on voluntary basis. -Working hours of employee also includes the break timings & as well as any trainings / committee meetings conducted in the facility. -26 sampled attendance records for October 2024 (most recent paid month) corresponding to payroll records, 26 sampled attendance records for April 2024 (random month) & 26 sampled attendance records for November 2023 (random month) corresponding to payroll records were reviewed. -Based on review of time records, the working hours analysis is summarized as follows: a) In October 2024 (Current month), the average regular working hours of 26 selected samples were 48.00 hours per week. Maximum overtime hours worked were 12 hours per week. Maximum total weekly working hours per week were 60.00 hours. b) In April 2024 (Current month), the average regular working hours of 26 selected samples were 47.07 hours per week. No weekly overtime was observed . Maximum total weekly working hours per week were 48.00 hours. c) In November 2023 (Current month), the average regular working hours of 26 selected samples were 47.15 hours per week. No weekly overtime was observed . Maximum total weekly working hours per week were 48.00 hours. Evidence Examined: -Working hours & overtime policy. -In / Out time records for 26 selected samples for each of 03 sampled payroll months of October 2024, April 2024 & November 2023. -List of national & festival holidays for year 2024 & 2023. -Production records for the months of October 2024 & January 2024. -Management interaction & worker interviews.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	No other considerations.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	60.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Facility has documented policy on anti-discrimination. -Based on review of wage records and employee’s interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement. -Mr. Virendra Kushwaha - Manager Compliance is responsible for the investigation and disposal of discrimination case. -Based on wage records review, the facility provides the same pay for employees doing same work of similar nature. -Facility avoids unfair practices during recruitment / hiring stage like conducting medical of female employees, discriminatory practices, political affiliation, etc . -Based on interaction with employees, no recruitment fees are required at any stage of the recruitment. -Facility has effective grievance mechanisms accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation. Evidence examined: -Facility anti-discrimination Policy. -Appointment letter with terms and conditions for 52 out of 52 selected samples. -Salary and other benefit records. -Grievance committee records & redressal mechanism. -Interaction with management and Employees.

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	Indian

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager Compliance is responsible to ensure compliance with these code requirements. -Based on record review and worker interviews appointment letters were issued to all 26 out of 26 sampled employees. Employment terms & conditions in the appointment letters found to be inline with legal requirement. -Based on interaction with the facility management, it was noted all the employees are hired directly; No temporary workers, part time workers, seasonal workers, casual or contractual workers were engaged. -Facility has not employed any foreign or inter state migrant workers. -Based on interaction with employees, no recruitment fees are required at any stage of the recruitment. -Facility is paying benefits to the employees which they are legally entitled to as mentioned in their appointment letter. -Based on interaction with management, it was confirmed that facility has certified standing orders. Evidence examined: -Facility hiring policy. -Certified standing order dated 01.08.2024. -Appointment letters with terms and conditions for 26 out of 26 selected samples. -Salary and other benefit records. -Interaction with management and Employees.

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Facility has not sub-contracted any of the processes to any of the sub-contractors. -No Homeworking is practised in the facility for any of the manufacturing process/activity. Evidence Examined: -Inward / Outward material records, Invoices. -Process flow chart. -Management interaction & worker interviews.

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No Supplier does not buy products or services from suppliers that use homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No There is no concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity
Are any sub-contractors used?	No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure no harsh or inhumane treatment is practiced in facility & its supply chain. -Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility. -All employees are treated with respect and dignity. -Facility has formed legally required works committee with elected & equal representatives from workmen & staff for reporting any complaints / issues. -Facility has formed legally required grievance committee with equal representatives from workmen & staff for reporting any complaints / issues. -Facility has also formed Internal Complaints Committee / POSH committee as required by law. External member Ms. Anuradha Tomer from Prabhat Education foundation (NGO engaged in women welfare & child education) is appointed. -From all the records of committee minutes of meeting no complaints were raised by the workers till date. Also, verified log register of suggestion & complaint box. -All above committee meetings are conducted every two months. -Facility has a written disciplinary procedure that is displayed on the notice board of the facility. Further, employees were aware of the same. Evidence Examined: -Facility policy on anti harassment at workplace. -Minutes of meeting of works committee record dated 23.10.2024 & 26.08.2024. -Minutes of meeting of grievance committee record dated 22.10.2024 & 24.08.2024. -Minutes of meeting of internal complaints committee record dated 16.10.2024 & 17.08.2024. -External member Ms. Anuradha Tomer from Simbosis Shikshan Evam Samaj Seva Smiti (NGO engaged in women welfare & child education) appointment letter. -Log of suggestion box records. -Management interaction & worker interviews.

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	Facility has installed suggestion box to report any grievances, also facility has open door policy.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Ms. Jayashri Patadiya - HR Manager is responsible for all environmental related issues. Facility is aware of the legal environmental requirements. -Facility has documented policy on environment & waste management. -Facility is exempted from by Pollution department to obtain the Pollution consent. The Gujarat Pollution Control Board has published a list of categories of cottage and small-scale industries having no pollution potential vide Notification Number No: GPCB/P-I 112/352040 on dated 12 April 2016. Such industries are exempted from obtaining Consent to Establish from Pollution Board. -Facility has conducted necessary ambient air quality, workplace air quality & noise level at its premises & results were within limits. -The land on which facility is operating is industrial area & does not have any adverse impact on environment in terms of land acquisition. It is non-agricultural land. -Facility monitors environmental aspect impact based on processes carried out in its premises. -Facility did not completed the appropriate section of the SAQ till the audit day. Evidence Examined: -Noise Monitoring Test dated - Air Ambient and Workplace Noise Monitoring test dated - Environmental Policy. - Environment Aspect and Impact analysis reviewed dated - Exemption certificate for Pollution consent dated

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	Not applicable
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -Ms. Jayashri Patadiya - HR Manager is responsible for all environmental related issues. Facility is aware of the legal environmental requirements. -Facility has documented policy on environment & waste management. -Facility is exempted from by Pollution department to obtain the Pollution consent. The Gujarat Pollution Control Board has published a list of categories of cottage and small-scale industries having no pollution potential vide Notification Number No: GPCB/P-I 112/352040 on dated 12 April 2016. Such industries are exempted from obtaining Consent to Establish from Pollution Board. -Facility has conducted necessary ambient air quality, workplace air quality & noise level at its premises & results were within limits. -The land on which facility is operating is industrial area & does not have any adverse impact on environment in terms of land acquisition. It is non-agricultural land. -Facility monitors environmental aspect impact based on processes carried out in its premises. -Facility did not completed the appropriate section of the SAQ till the audit day. Evidence Examined: -Noise Monitoring Test dated - Air Ambient and Workplace Noise Monitoring test dated - Environmental Policy. - Environment Aspect and Impact analysis reviewed dated - Exemption certificate for Pollution consent dated

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Biodiversity and eco system impact management Responsible use and management of water Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes Facility has system & complies for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	53,496	51,052
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details) None	Other (provide details) None

Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	0	0
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,707	1,524
Water discharged	Drain to local discharge	Drain to local discharge
Water volume discharged (m3)	1,622	1,488
Water volume recycled (m3)	0	0
Total waste produced (mt)	26	20
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	3,170,436	3,406,493

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Facility have maintained relevant policies and procedures to ensure Workplace Requirements are met. 2.Facility have appointed manager with sufficient seniority who is responsible for implementing procedures. 3.Facility have communicated and trained employees and other workers, including managers and supervisors, on relevant policies and procedures. 4.Facility have monitored the effectiveness of procedure to meet policy and workplace requirements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Facility has policy on Business ethics and anti-corruption / anti-bribery. -The facility follows requirements of local and national laws related to bribery, corruption, or any type of fraudulent business practices. -Ms Jayshri Patadiya / HR Manager is responsible for compliances related business ethics section. -There is no current local legislation. However, it was noted from the interaction with the facility management, the facility has communicated business code of conduct to all employees through trainings. -Facility has effective mechanism of whistle blowing on confidential reporting unethical practices to the management. -Based on committee meeting records no complaints of bribery or unethical practices were noted. -Suppliers & customers are communicated with business ethics policy through email & contract agreements. -Based on audit process and review of records, it was noted that the facility has not been recently subject to any fines/prosecutions for non-compliance to Business Ethics regulations. Hence there is no sustainable corrective actions implementation required. Evidence Examined: -Policy on business ethics, anti-bribery, anti-corruption, etc. -Business ethics / ETI base code training record dated 18th to 20th Nov 2024. -Confident reporting policy and procedure. -Log of suggestion / complaint box box. -Minutes of meeting of committees like works committee, grievance committee, etc. -Interaction with management and Employees.

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	Not applicable

Attachments

Fabric store.jpg

Employees found wearing mask.jpg

Finished goods.jpg

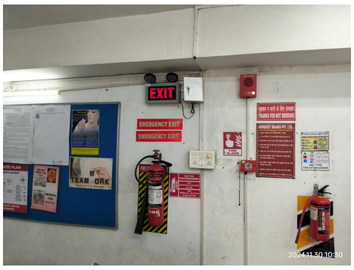
Fire Extinguishers.jpg

Evacuation Map.jpg

First aid Box.jpg

Emergency Lights.jpg

Emergency exit.jpg



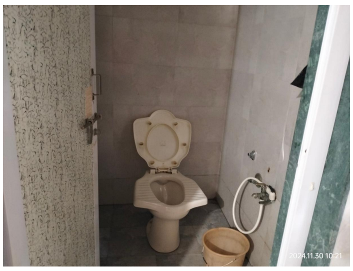
Emergency light.jpg

Drinking water point.jpg

Electrical Panel.jpg

Emergency contact displayed.jpg

Cutting section.jpg



Clean Toilets.jpg

Assembly point.jpg

Alarm Panel.jpg

Alarm.jpg

abstract displayed.jpg

Hydrant Box.jpg

Hose reel.jpg

Gender based toilet marked.jpg

punching machine.jpg

Pressing section.jpg

Pathways marked.jpg

policies displayed.jpg

Notice Board.jpg

packing section.jpg

packing material store.jpg

Needle guard provided.jpg

No child labour displayed.jpg

Name of the facility.jpg

Manual Call point.jpg

[Modular Sprinkler.jpg]

[Main Gate of the facility.jpg]

[MSDS and name displayed.jpg]

[Lunch Room.jpg]

[Information about grievance mechanism.jpg]

[Thread cutting.jpg]

[Suggestion Box.jpg]

[Sewing section.jpg]

[Sewing section (2).jpg]

[secondary containment displayed.jpg]

[Store.jpg]

[creche.jpeg]

[Signed cap.pdf]

For more information visit https://www.sedex.com

Sedex Members Ethical Trade Audit Report

Version 7

Sedex, 18 St Swithin's Lane, London, EC4N 8AD, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

← Contents   Findings →

Audit details

Site details

Sedex site reference	ZS1000083904	**Site name**	NORQUEST BRANDS - ML
Business name	Norquest Brands	**Site address**	G-301, G-401, H-301, H-401, SHARNAM METROLINKS, OPP. APPAREL PARK DEPOT, NR. NEW COTTON MILL CHAR RASTA, SUKHRAMNAGAR, AMRAIWADI AHMEDABAD IN 380026

Audit details

Sedex company reference	ZC1070289	**Auditor company name**	Intertek India
Audit company address	Intertek India Pvt Ltd., No. 501, Opp.to LRG College, Palladam Road,, Tirupur, IN, 641604		
Date of audit	2025-09-19	**Audit conducted by**	Mala Biredar
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out	Day 1		Day 2	
	In	10:00	In	10:00
	Out	18:10	Out	14:25
Audit type	Full initial			

← Contents Findings →

Was the audit announced?	Semi announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Jayshri Patadiya / HR and Compliance Manager
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No union on site		
Reason for absence during the audit	No union on site		
Reason for absence at the closing meeting	No union on site		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. 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.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	The semi announced window for this audit is from 10th September 2025 to 01 October 2025.

Lead auditor	Mala Biredar	**APSCA Number**	21700385
Additional auditor	Mrinmayee Mayekar	**APSCA Number**	32200998
Date of declaration	2025-09-20		

← Contents Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Jayshri Patadiya
Title	HR and Compliance Manager
Date of declaration	2025-09-20

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601132295
	3.L Implement effective processes to manage f...	Local law	NC ZAF601132293
	3.L Implement effective processes to manage f...	Local law	NC ZAF601132294
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601132296
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601132297

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	✓	✓	ⓘ	ⓘ
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	✓
6. Working hours are not excessive	✓	✓	✓	✓
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓
10.C. Business ethics	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings Site details →

Site details

Company and site details

Sedex company reference	ZC1070289	
Sedex site reference	ZS1000083904	
Company name	Norquest Brands	
Business ownership type	GOODS	
Site name	NORQUEST BRANDS - ML	
Site name in local language		
GPS location	**GPS address**	G 301,G401,H301,H401 SHARANAM METROLINKS OPP.APPAREL PARK DEPOT,NR .NEW COTTAN MILL CHAR RASTA SUKHRAM NAGAR AMRAIWADI AHMEDABAD
	Coordinates	23.02069560336885, 72.61296596685143
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Ms Jayashri Patadiya
	Job title	HR Manager
	Phone number	09377732800
	Email	compliance@norquestbrands.com

← Management systems

Worker analysis →

Company and site details

Applicable business and other legally required business license numbers and documents	Factory License No. 58553, Approved manpower 250, Approved Electrical Power 100 HP (Valid Up to 31.12.2029) Factory Plan Layout no – Amended Approved Building Layout plan with Plan #AHD/2025/CLRA//173 dated 08/07/2025 Stability Certificate dated 03/07/2025

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Manufacture of other textiles n.e.c.
	Secondary	
	Other	
Product type	Cotton bags	
Process overview	Manufacturing of Cotton bags. The process is as follows : Cutting, Stitching, Checking, Packing. Facility has 85 single needle machine , 07 overlock mahines ,3 belt making , 3 piping machines,3 Bartack machine ,8 cutting machines and utility machines onboard.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	2464m²

← Site details

Worker analysis →

Site scope

Building 1	**Last construction works on site**	2025
	If building is shared, provide details	Yes , facility is in shared building working on third and fourth floor
	Number of floors	2
	Description of floor activities	Ground floor – NA First floor - NA Second floor – NA as there are godown area belonging to other owners Third floor – Stitching, Washroom, Lunch room, creche Mezzanine – Pressing, Checking, Packing, Finish goods Forth floor – Cutting, Washroom Mezzanine – Belt making, Fabric store, Lunch room

Is there any difference between the site scope of the audit and the Sedex site profile?	No
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No
Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No

← Site details

Worker analysis →

Worker accommodation and transport

Does the site organise worker transport to the worksite?	Not provided Not provided nor required by law.

Work patterns

Approximate workers on site per month (% of peak)	**January**	0-25%	**February**	0-25%
	March	0-25%	**April**	0-25%
	May	75-90%	**June**	90-95%
	July	90-95%	**August**	90-95%
	September	90-95%	**October**	0-25%
	November	0-25%	**December**	0-25%
Is there any night shift work at the site?	No			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No The site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes Facility has conducted Human Rights Impact Assessment

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	32	*(32.7%)*	66	*(67.3%)*	-	-	98	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	32	*(32.7%)*	66	*(67.3%)*	-	-	98	*(100%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	0	-	0	-	-	-	0	*(0%)*
International migrant workers	0	-	0	-	-	-	0	*(0%)*
Total migrant workers	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	None

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	10	*(40%)*	15	*(60%)*	-	-	25	*(25.5%)*
15 - 17 years old	0	-	0	-	-	-	0	*(0%)*
Under 15 years old	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Indian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	33%	67%	-	100%

Workers by remuneration type

	Men		Women		Other		Total	
Workers paid per unit (piece rate)	0	-	0	-	-	-	0	*(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0	-	0	-	-	-	0	*(0%)*
Workers paid hourly / daily rate	0	-	0	-	-	-	0	*(0%)*
Salaried workers	32	*(32.7%)*	66	*(67.3%)*	-	-	98	*(100%)*

* % of total workforce

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	32	(32.7%)	66	(67.3%)	-	-	98	(100%)
Other	0	-	0	-	-	-	0	(0%)

* % of total workforce

If other payment cycle entered, please provide details	None

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	2	(100%)	0	(0%)	-	-	2
Supervisors or team leaders	9	(90%)	1	(10%)	-	-	10
Administrative staff	2	(100%)	0	(0%)	-	-	2

← Worker analysis

Worker interviews →

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	4 group of 5 employees.
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis

Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) None
What did the workers like the most about working at this site?	Work atmosphere (e.g. treatment by supervisors) Work environment – comfort (e.g. temperature, noise or dust levels) Other (provide details) Location of the facility
Additional comments	None
Attitude of workers' committee/union representatives	Workers of grievance committee found positive.
Attitude of managers	The facility management showed a positive attitude towards this audit during the whole audit process. At the end of the audit, all the non-compliances were accepted by the facility and further the facility management stated that they will take corrective actions on the non- compliances noted during the audit.

Workers interviewed by type

	Total
Permanent workers	23

← Worker analysis
Measuring workplace impact →

Workers interviewed by type

Temporary or fixed-term employees	0
Agency or subcontracted workers	3
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	10	10	-	20
Workers interviewed individually	1	5	-	6

← Worker analysis

Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	12.0%	12.0%	-	24.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?	Yes Yes accidents are recorded

← Worker interviews

Code area 0 →

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Measuring workplace impact
Code area 1 →

Systems and evidence examined to validate this code section	Current Systems: -The facility has allowed the auditor to conduct and complete the audit without any obstruction to requested documents, interviewees and the facility itself (including outbuildings and accommodation). -Facility has shown authentic & accurate records. Facility has extended complete transparency towards to audit process. -Facility did not engaged in any of the audit integrity issue like bribes or threatening to the auditor, nor in any way induce the auditor to be dishonest. -Facility provided accurate site description and Sedex site profile declared prior to or during the audit through SAQ. -Facility has documented human rights policy endorsed by the Ms. Jayashri Patadiya - HR Manager. -Facility has designated Ms. Jayashri Patadiya - HR Manager. responsible for implementing standards on human rights. -No human rights violation was observed in the facility. Same also confirmed from worker interviews. -Facility has identified its stakeholders & their salient issues. Also, facility has evaluated direct, indirect & adverse impact on human rights through its stakeholders & its process. -Facility provides regular trainings to all the employees in batches / groups on ETI base code & social policies covering human rights. -Facility has communicated ETI base code & social policies to its stake holders like suppliers & customers. Evidence Examined: -Policy & procedures on Anti-bribery, Anti-corruption & Human rights. -Appointment letter of Ms. Jayashri Patadiya - HR Manager. as responsible person for overall social compliance. -ETI base code / social policies training record dated 16/07/2025 to all the employees. -ETI base code / social policies communication records of suppliers & customer dated 05.04.2025 as they have common suppliers as parent company. -Management interaction & worker interviews.

← Measuring workplace impact

Code area 1 →

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Policies & Procedures: Facility has Forced labour policy, Recruitment policy which states about forced labour, human trafficking, debt bondage/ bonded labour which meets all workplace requirements in this code area. Forced labour policy and Recruitment policy which outlines the key mechanisms in place for preventing any forced labour work, equal opportunity for work and engagement of employees. 2) Resources: Ms Jayashri Patadiya- HR Manager as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in Hiring Procedure and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 0 Code area 1.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that no forced, bonded, involuntary or prison labour is employed at site & its supply chain. -Facility has a policy which prohibits forced labour, and this was available for review. -There was a formalised application procedure & recruitment policy which states that workers must present their identity cards for proof of age but only copies to be kept in the personnel files and the originals were given back to the workers. -The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. No bonds signed by any of the sampled workers. -The factory did not require any payment for work tools, PPE, Identity card, trainings, etc. -No loan schemes are functional in the facility. Same confirmed from worker interviews. No wage retention observed from audit process. -Facility has installed CCTV however not or the purpose of controlling or intimidating workers. -There is no evidence of forced, bonded, involuntary or prison labour in the factory. Evidences Examined: -Facility policy on no forced labour & no bonded labour. -Personnel files including application forms & appointment letters for 26 out of 26 sampled employees. -Wage records & bank statements. -Full & Final Settlement & resignation records. -Time records. -Management interaction & worker interviews.

← Code area 0

Code area 1.A →

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1 Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has Social Accountability policy which states about responsible recruitment and legal right to work which meets all workplace requirements in this code area. The Hiring procedure which outlines the key mechanisms in place for responsible recruitment and equal opportunity for work meeting legal requirement. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in Hiring Procedure and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 1

Code area 2 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure compliance with this code. -Based on the review of employee attendance records and employee's interview, the facility has not employed any national migrant workers, foreign nationals, etc. -Based on the review of employee personal files, all the employees are holding the legal rights to work in country. -Facility has a system to review original identity documents of all the employees prior to recruitment to confirm its nationality. Facility maintains copy of the verified identity document in the employees personal files. -As per facility hiring policy, employees not need to pay any recruitment fees and related costs. Evidence Examined: -Policy & procedure on hiring & recruitment. -26 out of 26 sampled employee's personnel files. -Management interaction & Worker interviews.

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited and hired by licensed labour providers Workers are recruited, selected, and hired directly by our company Workers are recruited, selected and hired directly by our company and licensed labour providers
Provide business names for all labour providers and programmes used	Aaryanshi Enetrprise
How do the labour providers recruit and hire workers?	Directly
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	1
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

← Code area 1.A   Code area 2 →

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Yes
What recruitment fees and costs do workers pay during the recruitment and employment process?	Other fee or cost (Please provide details) No fees taken by employees
Were recruitment fees or costs identified during worker interviews?	No No fees taken by employees

← Code area 1.A

Code area 2 →

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Facility has Social Accountability policy which states about freedom of association and their right to collective bargaining which meets all workplace requirements in this code area. The Social Accountability policy which outlines the key mechanisms in place to prohibit, discourage or interfere with workers' rights to join a trade union of their own choosing or other form of worker representation, including worker committees. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in social policies and same is checked through the internal audits. All the records of activities being monitoring are maintained

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1.A

Code area 3 →

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that 'Freedom of Association & Right to Collective Bargaining' is respected by the management. -Facility encourages and respects all employees' rights to join union freely & legally. Facility recognizes and encourages the right to freedom of association and collective bargaining under the law provision. -No labour union exists in the facility as legally not mandatory. However, facility has formed works and grievance committee with equal representatives of 06 members (03 staff and 03 workmen) from staff & workmen. Meeting is held every three months. Verified minutes of meeting. Facility displays notice of committee meetings on notice board. -Worker representatives are appointed in committee through appropriate election procedure amongst all the employees inline with the legal requirement. -All the committee meetings are conducted during regular work hours. -Facility also has open door policy wherein any employee can directly approach the management & raise his concern. -Facility has installed suggestion boxes at accessible location where employees can share their concerns anonymously. -There was no evidence of suppression of employees' rights. -Facility has displayed list of works committee members at the notice board. Evidence examined: -Policy & procedures on freedom of association. -Minutes of meeting of works committee record dated 14.07.2025. -Works committee elected representative election record dated 14.07.2025. -Log register of suggestion box & complaint box. -Management interaction & worker interviews.

← Code area 1.A   Code area 3 →

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Yes
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Not Applicable
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← Code area 2

Code area 3 →

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Facility has Health and Safety policy which states about ensuring a safe working environment and adequate controls to prevent accidents and injury which meets all workplace requirements in this code area. The Health & Safety policy outlines the key mechanisms in place for preventing any unsafe work and prevent accidents. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by Health & Safety team for all employees. Health and Safety policy is displayed on notice board and also communicated to all employees through training, also available on company portal. However, facility need some improvement as some gaps observed during the audit process as mentioned below. 4) Monitoring: Health & Safety Team has overall responsibilities for monitoring implementation of requirements stated in Health and Safety policy and same is checked through the internal audits and safety audits. All the records of activities being monitoring are maintained. However, facility need Some improvement as some gaps observed during the audit process as pertaining to pathways, PPE and evacuation Map

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601132295
	3.L Implement effective processes to manage f...	Local law	NC ZAF601132293
	3.L Implement effective processes to manage f...	Local law	NC ZAF601132294

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	1. Ms. Jayashri Patadiya - HR Manager is responsible to ensure a healthy and safe work environment in the facility. 2. The facility has established General health and safety policy, occupational health and safety policy and emergency evacuation procedure. 3. Facility has provided 03 First Aid Boxes throughout the facility along with In house in-house trained 14 first aiders. 4. Facility has established Hazard and Identification Risk Assessment for all processes was reviewed on dated 01/05/2025. 5. Facility has provided training to 20 employees in rendering first aid treatment dated 15/07/2025 . through M/s Indian Red cross society and certificates of training valid for 1 year from date of training imparted. 6. Facility has provided clean and potable drinking water to all the employees free of cost. Latest test was conducted through Prism test and measure pvt ltd on 14/07/2025 . 7. Facility has provided accessible and functional fire-fighting equipment (48 fire extinguishers, 16 Manual call points with 6 Hooters , 12 Emergency Lights, 189 Smoke Detectors. Further based on the review of fire extinguishers, fire alarms, and Emergency lights service records, facility conducts inspection for firefighting equipment externally. Last inspection was conducted dated 22/07/2025 internally. 8. Facility has conducted Health and Safety and periodic firefighting training for all employees in separate batches. Last trainings were done on 18/07/2025 . Total participants were range between 60 in each training including staff and workers. 9. Facility has provided appropriate and relevant personal protective equipment like, hand gloves, Head Caps, Aprons and safety shoes at free of cost to the employees. Workers also found using PPE however some deviation noted is raised. 10. Facility has conducted mock drills once in two months covering all the employees working in day shifts. Last drill was conducted on 18/07/2025 with 54 employees. 11. Facility has formed Health and Safety committee which consists of 05 members (1 from management and 4 workmen). Meeting is held once in three months. Last committee meeting was conducted on 17/07/2025 . The topics covered were general health and safety issues 12. All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards. Chemical safety 13. No Chemical is used in the facility except machine oil. 14. Evacuation plan posted however some deviation noted. 15. Aisles marked however some deviation noted. Machine safety 1. Written procedures found established by facility to operate a machinery 2. Required Personal Protective Equipment's are provided to employees operating machineries 3. Danger signages are marked and identified on the machineries

← Code area 2

Code area 4 →

4. Emergency buttons are marked on all machineries
5. Safety guards were provided to all machineries
6. Standard operating procedure and machine safety trainings were provided to all employees at regular intervals
7. Hazard and Risk analysis has been performed by facility for all machineries and utilities.
8. Facility has conducted testing of Pressure vessels and Goods lift from competent agency dated 19/08/2025 and 20/08/2025 respectively

Evidence Examined:
1. Factory Plan Layout no – Amended Approved Building Layout plan with Plan #AHD/2025/CLRA//173 dated 08/07/2025
2. Stability Certificate dated 03/07/2025
3. Minor Injury records – Updated till August 2025.
4. First Aid Training records
5. Firefighting Training records
 Mock drill records.
7. Drinking Water Test report
8. Interaction with Management and Interview with employees.
9. Health and safety policy
10. Health and safety manual
11. Hazard Identification and Risk Analysis (HIRA)
12. Health and safety committee minutes
13. Fire Fighting systems maintenance records
14. Pressure vessels and Goods lift inspection record

Findings: non-compliances

ZAF601132295

Non-compliance

Due 2025-11-12

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Issue title

278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Description

It was noted from site tour that a)02 employees found not wearing safety shoes in fourth floor whilst moving material b) 02 employees found not wearing safety mask while operating overlock machine

Corrective and preventative actions

It is recommended to the facility to ensure that appropriate PPE is used by employees

Local law reference

In accordance with Factories Act, 1948. Section 7A: General duties of the occupier - (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory.(2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include - (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health;

Evidence

Status

Closed (2025-11-08)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

[employee not wearing PPE.jpg]

[Employee not wearing safety shoes.jpg]

* PDF generated at 07:03 (UTC) on 08 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601132293

Non-compliance

Due 2025-11-12

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

215 - Evacuation plan not adequately communicated to workers

Description

It was noted from site tour that facility has displayed evacuation plan in third and fourth floor , however legends mentioned in local language is handwritten on map and is not clearly visible.

Corrective and preventative actions

It is recommended to the facility to ensure that evacuation map is posted in local language which is clearly visible

Status

Closed (2025-11-08)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

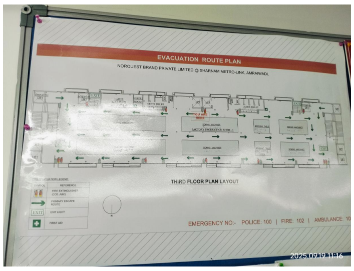
← Code area 3

Code area 4 →

Local law reference

In accordance with Factories Act 1948 ,Chapter IV safety, section 38.Precaution in case of Fire 1) In every factory ,all practicable measures shall be taken to prevent outbreak of fire and its spread ,both internally and externally , and to provide and maintain-(a) safe means of escape for all persons in the event of a fire and (b) the necessary equipment and facilities for extinguisher fire.(2) effective measure shall be taken to ensure that in every factory all the works are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.

Evidence



[Evacuation Map _ not marked in local language.jpg]

* PDF generated at 07:03 (UTC) on 08 Nov 2025. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601132294

Non-compliance

Due 2025-11-12

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-11-08)*

← Code area 3

Code area 4 →

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

209 - Not all emergency exits are properly marked and lighted

Description

It was noted from site tour that pathways are not marked on side of sewing _working area in third floor and cutting area _fourth floor, around 15 employees found working

Corrective and preventative actions

It is recommended to the facility to ensure pathways are marked both sides to ensure that pathway is defined for easy evacuation

Local law reference

In accordance with Factories Act 1948 ,Chapter IV safety, section 38.Precaution in case of Fire 1) In every factory ,all practicable measures shall be taken to prevent outbreak of fire and its spread ,both internally and externally , and to provide and maintain-(a) safe means of escape for all persons in the event of a fire and (b) the necessary equipment and facilities for extinguisher fire.(2) effective measure shall be taken to ensure that in every factory all the works are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.

Evidence

Pathways not marked on both side.jpg

Pathways not marked on both side (2).jpg

Pathway not marked another side.jpg

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 07:03 (UTC) on 08 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes No structural additions in the building, hence not applicable.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

← Code area 3 Code area 4 →

Does the site have a structural engineer evaluation?	Yes

← Code area 3

Code area 4 →

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has Social Accountability policy which states about no child labour, child remediation plan which meets all workplace requirements in this code area. The No Child labour policy which outlines the key mechanisms in place for preventing any child labour work and also child remediation plan in case of any child labour observed at site. 2) Resources: Ms Jayashri Patadiya- HR Manager as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in No Child labour policy and same is checked during hiring and through the internal audits. All the records of activities being monitoring are maintained.

← Code area 3 Code area 5 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that no child / underage workers are employed at site & their supply chain. -Facility has displayed "No Child Labour" board outside the Main Gate. -Based on the physical appearance of employees during walk through and Interviews with employees, there was no evidence of child labour or young labour observed / reported. -Based on review of facility recruitment policy, employee's ID for age proof such as Pan Card or Aadhar card was checked by hiring team prior to hiring. -Facility has documented No Child Labour policy & as per review of policy, the minimum hiring age of the facility is 18 years old. -The age of youngest worker found in the facility through audit process is 22 years. -26 out of 26 sampled employee's personnel files were reviewed to check the copy of age proof documents. Evidence examined: -Policy on no child labour & child labour remediation. -Personal files for verification of age proof records of 26 out of 26 selected samples. -Management interaction & worker interviews.

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	25%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	22
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	No

← Code area 4
Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has remuneration policy which states about wages and benefits which meets all workplace requirements in this code area. The remuneration policy which outlines the key mechanisms in place to meet legal minimum wage and social benefit requirements as per local law. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in remuneration policy and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 4

Code area 5.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 4

Code area 5.A →

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law. -26 sampled employees were selected for interview. Out of which 20 employees were interviewed individually & remaining 06 employees were interviewed in 04 group of 05 employees in each group. -All employees said they were satisfied with their employment at the facility. Workers were happy with the wage's facility pays and found meeting the government notified minimum wages in the region. -From last 4 months, 26 sampled employee's wages & working hours records were verified for randomly selected 03 sampled months i.e., August 2025 , July 2025 and June 2025 as facility started its operations since May 2025. -The legal minimum wages applicable in Gujarat with effect from 01/04/2025 to 30/09/2025 is Unskilled - INR 12935 per month, Semiskilled - INR 13195 per month and Skilled - INR 13507 per month.. -Legal minimum wages were paid to all the sampled employees; INR 13000.00 per month was lowest paid to packing worker (unskilled category) -Wage slips were provided to all the employees. Verified sampled wage slips & confirmed from worker interviews too. -Employee provident fund benefit & employee state insurance scheme benefit is extended to all the eligible employees. Contribution remittance was deposited on time. -Employee state insurance scheme is not applicable in this region however facility has obtained valid workmen's compensation policy. -Employees' wages are calculated on monthly basis & paid through bank transfers only. -Statutory benefits like bonus & leave with wages were also provide to all the eligible employees. Bonus is calculated at 8.33 % of the minimum wages and paid during Diwali festival. Leave with wages benefit is extended to all the eligible employees as per the law i.e., 1 day for every 20 days worked. Further, 07 casual leaves are provided to all the employees. -Based on employee's interview and record review all the employees received appointment letter with written and understandable information about their employment conditions in respect to wages. -No inconsistency was noted between the provide payroll records, worker interviews, production records & broken needle records. -Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules. -From sampled months of August 2025 , July 2025 and June 2025 regular hours were within the legal limits in all the sampled employees time records. Facility has not worked overtime hours in August 2025 -Full & final settlement records verified for 01 sampled left employee.

← Code area 4   Code area 5.A →

Evidence Examined:
-Wages and benefits policy.
-26 sampled payroll records for August 2025 (most recent paid month), 26 sampled payroll records for July 2025 (random month) & 26 sampled payroll records were reviewed for June 2025 (random month).
-All attendance records pertained to the corresponding 26 sampled payroll records were reviewed.
-Employee provident fund remittance challans for 03 sampled months.
-Leave with wage register
-Employment contracts for all 26 sampled employees (to examine agreed wage rates).
-Pay slips of all reviewed corresponding payroll records.
-List of national & festival holidays.
-Minimum wages notification.
-Bank statements of salary paid (of 3 sampled months)
- Bonus is not applicable as facility has started in the month of May 2025
-Management interaction & worker interviews.

← Code area 4

Code area 5.A →

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable

← Code area 5

Code area 5.A →

Actual required working hours	**Required hours per day**	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	2.0
	Max hours per month	5.0
Minimum legal wage	**Min per hour**	0.0
	Min per day	497.5
	Min per week	0.0
	Min per month	12935.0
Actual minimum wage	**Actual per hour**	Non applicable
	Actual per day	500.0
	Actual per week	0.0
	Actual per month	13000.0
Minimum legal overtime wage	**Min per hour**	249.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

← Code area 5 Code area 5.A →

Actual minimum overtime wage	**Actual per hour**	125.0
	Actual per day	250.0
	Actual per week	250.0
	Actual per month	625.0

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 records of wages and working hours from 03 sampled months, August 2025(Current month), July 2025(Random month) and June 2025(Random month) from the scope period of May 2025 to August 2025 as facility has started working since May 2025.
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Not applicable
Indicate the breakdown of workforce per earnings	The legal minimum wages applicable in Gujarat with effect from 01/03/2025 to 30/09/2025 is Unskilled - INR 497.50 per day , Semiskilled - INR 507.50 per day and Skilled - INR 519.50 per month.
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

← Code area 5 Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...	Base code	NC ZAF601132296
	5.A.B Put in place a wage improvement plan th...	Base code	NC ZAF601132297

Systems and evidence examined to validate this code section	Current System: -It was noted from review of records & management interaction that facility has not conducted a review considering the total pay of employees including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap' and understand what proportion of the workforce has a gap. -It was noted from review of records & management interaction that facility has not conducted a review on wage improvement plan (with Living Wage as the goal) that aims to pay workers a living wage with stated timeframe. Evidence Examined: -Facility wage policy. -Salary registers pay slip and Time records for 10 sampled employees for 3 random selected months. -Management interaction & worker interviews

← Code area 5
Code area 6 →

Findings: non-compliances

ZAF601132296

Non-compliance

Code area

5.A Living wages are paid

Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

Issue title

903 - CAR: A living wage gap analysis has not been completed

Description

Based on the audit process and record review it was noted that facility has not conducted a review considering the total pay of employees including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap' and understand what proportion of the workforce has a gap.

Corrective and preventative actions

It is recommended that facility shall ensure to conduct a living wage gap analysis

Status

Open*

Time given to resolve

Verification method

Collaborative action required

Area of non-compliance/non-conformance

Base code

* PDF generated at 07:03 (UTC) on 08 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601132297

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

← Code area 5.A

Code area 6 →

Workplace requirement

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

Issue title

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

Description

Based on the audit process and record review it was noted that facility has not conducted a review considering the total pay of employees including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap' and understand what proportion of the workforce has a gap.

Time given to resolve

Verification method

Collaborative action required

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

It is recommended that facility shall ensure to conduct a living wage gap analysis.

* PDF generated at 07:03 (UTC) on 08 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 5.A

Code area 6 →

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has Working hour policy which states about regular working hours and overtime hours which meets all workplace requirements in this code area. The working hours policy which outlines the standard and overtime hours requirements for preventing any excessive work beyond the limit of local law. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in working hours policy and same is checked through the internal audits. All the records of activities being monitoring are maintained

← Code area 5.A

Code area 7 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 5.A

Code area 7 →

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible for ensuring compliance with regular and overtime hours as per law. -Facility has documented policy on regular working hours & overtime. -The employees work for 6 days a week in four shifts. Permanent employees works in General shift : 09:30am to 06:00pm Lunch Break : 30 minutes (staggered) Tea Break : 15 minutes twice in a day (staggered) Security shift 1 : 08:00am to 04:00pm Security shift 1 : 04:00pm to 12:00pm Weekly Off: Sunday for general shift employees and staggered for rest of the shifts. -Sunday is weekly holiday for all the employees except security guards. Security guards are provided with staggered weekly off. All the employees are provided with one day off in every week /seven-day period. -Facility has installed biometric attendance machine to record In Out time / attendance of all the employees on daily basis. Employee themselves record In / Out time through fingerprint scan. -Standard working hours were within the legal limits i.e., 08 hours per day & 48 hours per week. Facility has worked overtime hours in all the sampled months however they were within the legal limits of 2 hours per day & 12 hours per week. Further, worker's interview confirmed that overtime if required will be on voluntary basis. -Working hours of employee also includes the break timings & as well as any trainings / committee meetings conducted in the facility. -26 sampled attendance records for August 2025 (most recent paid month) corresponding to payroll records, 26 sampled attendance records for July 2025 (random month) & 26 sampled attendance records for June 2025 (random month) corresponding to payroll records were reviewed. -Based on review of time records, the working hours analysis is summarized as follows: a) In August 2025 (Current month), the average regular working hours of 26 selected samples were 48.00 hours per week. No overtime conducted in this month b) In July 2025 (Current month), the average regular working hours of 26 selected samples were 47.07 hours per week. Maximum total weekly working hours per week were 50.00 hours. c) In June 2025 (Current month), the average regular working hours of 26 selected samples were 47.15 hours per week. No overtime conducted in this month Evidence Examined: -Working hours & overtime policy. -In / Out time records for 26 selected samples for each of 03 sampled payroll months of August 2025 , July 2025 & June 2025 -List of national & festival holidays for year 2025

← Code area 5.A

Code area 7 →

-Production records for the months of August 2025 , July 2025 & June 2025
-Management interaction & worker interviews.

← Code area 5.A

Code area 7 →

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Overtime is paid at 200 % of ordinary rate of wages
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	50.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	50.0
Maximum number of days worked without a day off in sample	6

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has non-discrimination policy which states about equity approach in recruitment, training, development and promotion processes which meets all workplace requirements in this code area. The non-discrimination policy which outlines the key mechanisms in place to give equal opportunity at work. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in non-discrimination policy and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 6

Code area 8 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Facility has documented policy on anti-discrimination. -Based on review of wage records and employee’s interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement. -Ms Jayshri Patadiya / HR Manager is responsible for the investigation and disposal of discrimination case. -Based on wage records review, the facility provides the same pay for employees doing same work of similar nature. -Facility avoids unfair practices during recruitment / hiring stage like conducting medical of female employees, discriminatory practices, political affiliation, etc . -Based on interaction with employees, no recruitment fees are required at any stage of the recruitment. -Facility has effective grievance mechanisms accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation. -Equal remuneration is applied consistently for equal job and compensation is based on skill / experience and dedicated equity approach applied in recruitment, training, development and promotion processes. Evidence examined: -Facility anti-discrimination Policy. -Appointment letter with terms and conditions for 26 out of 26 selected samples. -Salary and other benefit records. -Grievance committee records & redressal mechanism. -Interaction with management and Employees.

← Code area 6

Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	Indian

← Code area 7

Code area 8 →

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has Hiring policy which states about hiring procedure which meets all workplace requirements in this code area. The Hiring procedure which outlines the key mechanisms in place which specifies the terms and conditions of employment and meet legal conditions for the use of apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in Hiring Procedure and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 7

Code area 8.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager Compliance is responsible to ensure compliance with these code requirements. -Based on record review and worker interviews appointment letters were issued to all 26 out of 26 sampled employees. Employment terms & conditions in the appointment letters found to be inline with legal requirement. -Based on interaction with the facility management, it was noted all the employees are hired directly; No temporary workers, part time workers, seasonal workers, casual or contractual workers were engaged. -Facility has not employed any foreign or inter state migrant workers. -Based on interaction with employees, no recruitment fees are required at any stage of the recruitment. -Facility is paying benefits to the employees which they are legally entitled to as mentioned in their appointment letter. Evidence examined: -Facility hiring policy. -Appointment letters with terms and conditions for 26 out of 26 selected samples. -Salary and other benefit records. -Interaction with management and Employees.

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

← Code area 8 Code area 8.A →

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has Social policy which states about sub-contracting work which meets all workplace requirements in this code area. These policies outlines the key mechanisms in place for preventing any unauthorised sub-contracting and homeworking. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. All the social policies are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR Team has overall responsibilities for monitoring implementation of requirements stated in social policy and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 8

Code area 9 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current Systems: -Facility has not sub-contracted any of the processes to any of the sub-contractors. -No Homeworking is practised in the facility for any of the manufacturing process/activity. Evidence Examined: -Inward / Outward material records, Invoices. -Process flow chart. -Management interaction & worker interviews.

← Code area 8

Code area 9 →

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No Not applicable as there is no homeworking

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No Not applicable as there is no sub-contracting

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

[← Code area 8.A] [Code area 9 →]

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	1) Policies & Procedures: Facility has Disciplinary policy and Anti-harassment policy which states about disciplinary procedure and prevention of harassment at work which meets all workplace requirements in this code area. These policies outlines the key mechanisms in place for disciplinary action and preventing any harassment cases at work. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. Facility has also formed Grievance committee and Internal complaint committees to handle grievances and complaints raised by employees. 3) Communication & Training: Facility has carried out regular training at site by HR team for all employees. Disciplinary policy and Anti-harassment policy are displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: Grievance committee and Internal complaint committee have overall responsibilities for monitoring implementation of requirements stated in Disciplinary policy and Anti-harassment policy and same is checked through the internal audits. All the records of activities being monitoring are maintained

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 8.A

Code area 10.A →

Systems and evidence examined to validate this code section	Current Systems: -Ms Jayshri Patadiya / HR Manager is responsible to ensure no harsh or inhumane treatment is practiced in facility & its supply chain. -Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility. -All employees are treated with respect and dignity. -Facility has formed legally required works committee with elected & equal representatives from workmen & staff for reporting any complaints / issues. -Facility has also formed Internal Complaints Committee / POSH committee as required by law. External member from Prabhat education foundation- NGO is appointed. -From all the records of committee minutes of meeting no complaints were raised by the workers till date. Also, verified log register of suggestion & complaint box. -All above committee meetings are conducted every two months. -Facility has a written disciplinary procedure that is displayed on the notice board of the facility. Further, employees were aware of the same. Evidence Examined: -Facility policy on anti harassment at workplace. -Minutes of meeting of grievance committee record dated 17/07/2025 . -Minutes of meeting of internal complaints committee record dated 14/07/2025 -External member from Prabhat education foundation- NGO is appointed. -Log of suggestion box records. -Management interaction & worker interviews.

← Code area 8.A

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
What type of grievance mechanism(s) are available?	Suggestion box , Grievance commitee
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9

Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has Environment policy which states about comply with relevant local, regional and national environmental laws which meets all workplace requirements in this code area. The Environment policy which outlines the key mechanisms in place to meet all legal requirements and prevention and control of environmental impacts of their own operations on environment. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site by EHS team for all employees. Environment policy is displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: EHS Team has overall responsibilities for monitoring implementation of requirements stated in Environment policy and same is checked through the internal audits. All the records of activities being monitoring are maintained.

← Code area 9

Code area 10.B →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -Ms. Jayashri Patadiya - HR Manager is responsible for all environmental related issues. Facility is aware of the legal environmental requirements. -Facility has documented policy on environment & waste management. -Facility is exempted from by Pollution department to obtain the Pollution consent. The Gujarat Pollution Control Board has published a list of categories of cottage and small-scale industries having no pollution potential vide Notification Number No: GPCB/P-I 112/352040 on dated 12 April 2016. Such industries are exempted from obtaining Consent to Establish from Pollution Board. -Facility has conducted necessary ambient air quality, workplace air quality & noise level at its premises & results were within limits. -The land on which facility is operating is industrial area & does not have any adverse impact on environment in terms of land acquisition. It is non-agricultural land. -Facility monitors environmental aspect impact based on processes carried out in its premises. -Facility has completed the appropriate section of the SAQ till the audit day. Evidence Examined: -Noise Monitoring Test dated - Air Ambient and Workplace Noise Monitoring test dated - Environmental Policy. - Environment Aspect and Impact analysis reviewed dated - Exemption certificate for Pollution consent dated

← Code area 9

Code area 10.B →

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	None
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: -Ms. Jayashri Patadiya - HR Manager is responsible for all environmental related issues. Facility is aware of the legal environmental requirements. -Facility has documented policy on environment & waste management. -Facility is exempted from by Pollution department to obtain the Pollution consent. The Gujarat Pollution Control Board has published a list of categories of cottage and small-scale industries having no pollution potential vide Notification Number No: GPCB/P-I 112/352040 on dated 12 April 2016. Such industries are exempted from obtaining Consent to Establish from Pollution Board. -Facility has conducted necessary ambient air quality, workplace air quality & noise level at its premises & results were within limits. -The land on which facility is operating is industrial area & does not have any adverse impact on environment in terms of land acquisition. It is non-agricultural land. -Facility monitors environmental aspect impact based on processes carried out in its premises. -Facility has completed the appropriate section of the SAQ till the audit day. Evidence Examined: -Noise Monitoring Test dated - Air Ambient and Workplace Noise Monitoring test dated - Environmental Policy. - Environment Aspect and Impact analysis reviewed dated - Exemption certificate for Pollution consent dated

← Code area 10.A

Code area 10.C →

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Biodiversity and eco system impact management
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes Faciity is not using any chemicals
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes Facility has checked that business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)

← Code area 10.B

Code area 10.C →

Total electricity consumption from non-renewable sources (kWh)	1,000	0
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details) None	Other (provide details) None
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	None	None
Has the site completed any carbon footprint analysis?	No	No
Water sources	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,000	0
Water discharged	1000	0
Water volume discharged (m3)	1,000	0
Water volume recycled (m3)	0	0
Total waste produced (mt)	80	0
Total hazardous waste produced (mt)	0	0

← Code area 10.B   Code area 10.C →

Waste to recycling (mt)	80	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	100,000	0

← Code area 10.B

Code area 10.C →

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1) Policies & Procedures: Facility has business ethics policy which states about comply with relevant local, regional and national laws which meets all workplace requirements in this code area. 2) Resources: Ms Jayashri Patadiya- HR Manager assigned as responsible person for ensuring its resourcing, approval and regular review of the implementation of requirements stated in this code. 3) Communication & Training: Facility has carried out regular training at site all employees. Business ethics policy is displayed on notice board and also communicated to all employees through training, available on company portal. 4) Monitoring: HR team has overall responsibilities for monitoring implementation of requirements stated in policy and same is checked through the internal audits. All the records of activities being monitoring are maintained.

Summary of findings

← Code area 10.B

Code area	Workplace requirement	Area of NC	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: -Facility has policy on Business ethics and anti-corruption / anti-bribery. -The facility follows requirements of local and national laws related to bribery, corruption, or any type of fraudulent business practices. -Ms Jayshri Patadiya / HR Manager is responsible for compliances related business ethics section. -There is no current local legislation. However, it was noted from the interaction with the facility management, the facility has communicated business code of conduct to all employees through trainings. -Facility has effective mechanism of whistle blowing on confidential reporting unethical practices to the management. -Based on committee meeting records no complaints of bribery or unethical practices were noted. -Suppliers & customers are communicated with business ethics policy through email & contract agreements. -Based on audit process and review of records, it was noted that the facility has not been recently subject to any fines/prosecutions for non-compliance to Business Ethics regulations. Hence there is no sustainable corrective actions implementation required. Evidence Examined: -Policy on business ethics, anti-bribery, anti-corruption, etc. -Business ethics / ETI base code training record dated 18th to 20th Nov 2024. -Confident reporting policy and procedure. -Log of suggestion / complaint box box. -Minutes of meeting of committees like works committee, grievance committee, etc. -Interaction with management and Employees.

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	None

← Code area 10.C

Attachments

Hose reel.jpg

Gender based toilet marked.jpg

Humidity control Room.jpg

First aid box.jpg

Finishing section.jpg

Handrail provided to staircase.jpg

Fabric store.jpg

Finished goods storage.jpg

Fire Extinhuishers.jpg

Employee not wearing safety shoes.jpg

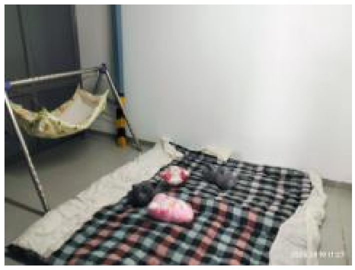
Evacuation Map _ not marked in local language.jpg

employee not wearing PPE.jpg

Emergency exit.jpg

Electrical Panel.jpg

Drinking water point.jpg



Creche.jpg

Clean toilet.jpg

Cutting table.jpg

Bag making machine.jpg

Packing section.jpg

Needle guard provided.jpg

Packing material storage.jpg

Notiec Board.jpg

No child labour board displayed.jpg

overview of building.jpg

Name of the facility.jpg

Manual call point.jpg

Lunch room.jpg

[Locker room.jpg]

[Lift.jpg]

[Main entrance of the facility.jpg]

[Pathways marked.jpg]

[Pathways marked (2).jpg]

[Smoke detector.jpg]

[Suggestion Box.jpg]

[Punching machne.jpg]

[Semi finished goods storage.jpg]

[Sewing section.jpg]

[Signed CAPR.pdf]