




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 413320412	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 413321662
Business name (Company name):	SPORTING SYNDICATE INTERNATIONAL PVT. LTD		
Site name:	SPORTING SYNDICATE INTERNATIONAL PVT. LTD		
Site address: <i>(Please include full address)</i>	Village Wariyana, Kapurthala Road, Near Jalandhar Kunj, Janlandhar 1, Jalandhar, India - 144021	Country:	India
Site contact and job title:	Mr. Dinesh Kumar Sharma – Factory Manager		
Site phone:	91 9988902072	Site e-mail:	OFFICE@SPORTSGOODSINDIA.COM
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	January 10 & 11, 2022		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> SPORTING SYNDICATE INTERNATIONAL PVT. LTD
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Ms. Parul Jaglan, Senior Auditor APSCA number: RA 21700536
Lead auditor APSCA status: RA

Team auditor: None

Interviewers: Ms. Parul Jaglan, Senior Auditor APSCA number: RA 21700536

Report writer: Ms. Parul Jaglan, Senior Auditor

Report reviewer: Ms. Meeta Pednekar, Report Reviewer- CSR

Date of declaration: January 10 & 11, 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		00	00	None Observed
0B Management systems and code implementation		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	<ul style="list-style-type: none"> It was noted from review of records that facility has not obtained their approved building layout plan on the name of M/s Sporting Syndicate International Pvt.Ltd." However, it was noted that facility has approved building layout plan on the name of M/s Sporting Syndicate Pvt. Ltd." Facility has changed their name from M/s Sporting Syndicate Pvt. Ltd." To M/s Sporting Syndicate International Pvt.Ltd." Further facility has not done any changes in building structure. Further, facility had obtained certificate of incorporation on January 15, 2020.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
<input type="checkbox"/> Freedom of Association		<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
3 Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	02	00	00	1) Based from tour of the facility it was noted that facility had not provided

									<p>secondary containment to Ink container used and store in printing section at second floor.</p> <p>2) It was noted from tour of the facility that 02 out of 07 employees were working on screen printing section at second floor in building no.1 were found using cotton hand gloves instead of rubber hand gloves. It was 'partial' compliance because facility has provided PPE to all the employees working in screen printing process however 02 employees were not using rubber hand gloves.</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	01	00	<p>Observation :-</p> <p>It was noted that, facility has paid arrear payment for revised minimum wages as per minimum wage notification dated 30/11/2021 with effective from 1/9/2020 to all the eligible employees on 6 January 2022 in cash instead of bank transfer.</p>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	None Observed
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed

8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	None Observed
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not Applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not Applicable

General observations and summary of the site:

Audit Process

This Initial audit was conducted by Intertek India Pvt. Ltd. There was 01 auditor, who assessed the facility's operations in 02 days. The scope of this audit was based on 2 Pillar SMETA systems.

Overview of opening meeting, facility management responses

Auditor entered the facility at 09: 40 am and conducted an opening meeting with facility management Mr. Dinesh Kumar Sharma – Factory Manager according to the ETI Base Code. They assured full co-operation to this audit.

Site Summary:-

- Facility is into Manufacturing of Sports goods.
- Overall responsibility for meeting the standards is taken by Mr. Dinesh Kumar Sharma – Factory Manager.
- A total of 415 employees (62 management and 353 worker) on site, out of which 231 male and 184 female employees and all are company employee.
- The youngest worker on site was 22 years old.
- There is no union at this factory.
- The facility is using not using Sub-Contractors.
- Facility has started its operation in existing location since July-2020
- 26 workers were selected for interview; they were interviewed as 04 group of 05 employees each and the balance of 6 workers were interviewed individually.
- All workers said they were satisfied with their employment at the factory.

- 26 attendance records and payroll records for December-2021 (Current month), 26 attendance records and payroll records for August 2021 (Random month) and 26 attendance records and payroll records for March 2021 (Random month) were reviewed in this audit.
- Legal minimum wage was paid to all workers; legal minimum wage was INR 9192.72 per month. Facility has paid INR 9193 per Month.
- All employees worked for 6 days a week from Monday to Saturday with weekly off on Sunday. All employees work in general shift: from 09:00am to 05:30 pm with one lunch breaks of 30 minutes 13.00 to 13:30 hours and two tea breaks of 15 minutes from 11:00am to 11:15am & 03:00pm to 03:15pm.
- Salary to all employees is fixed on monthly basis and paid once in a month accordingly. Salary to all the employees is paid through bank transfer and on or before 7th day of every month.
- Based on the provided attendance records, standard working hours in this facility were 8 hours per day, 48 hours per week with at least 1 day off in a week.

Issues Found

NC's

0B- Management system:-

It was noted from review of records that facility has not obtained their approved building layout plan on the name of M/s Sporting Syndicate International Pvt.Ltd." However, it was noted that facility has approved building layout plan on the name of M/s Sporting Syndicate Pvt. Ltd." Facility has changed their name from M/s Sporting Syndicate Pvt. Ltd." To M/s Sporting Syndicate International Pvt.Ltd." Further facility has not done any changes in building structure. Further, facility had obtained certificate of incorporation on January 15, 2020.

3-Safety and Hygienic Conditions-

- 1) Based from tour of the facility it was noted that facility had not provided secondary containment to Ink container used and store in printing section at second floor.
- 2) It was noted from tour of the facility that 02 out of 07 employees were working on screen printing section at second floor in building no.1 were found using cotton hand gloves instead of rubber hand gloves. It was 'partial' compliance because facility has provided PPE to all the employees working in screen printing process however 02 employees were not using rubber hand gloves.

5 Living Wages and Benefits

Observation: - It was noted that, facility has paid arrear payment for revised minimum wages as per minimum wage notification dated 30/11/2021 with effective from 1/9/2020 to all the eligible employees on 6 January 2022 in cash instead of bank transfer.

Positive observations:

1. There is no evidence of child labour and forced labour.
2. There is no evidence of any discrimination, harassment and abuse or unfair disciplinary practices.

GE

None observed

Additional Auditor Remark:

None Observed

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

Site Details

Site Details																							
A: Company Name:	SPORTING SYNDICATE INTERNATIONAL PVT. LTD																						
B: Site name:	SPORTING SYNDICATE INTERNATIONAL PVT. LTD																						
C: GPS location: (If available)	GPS Address: Village Wariyana, Kapurthala Road, Near Jalandhar Kunj, Janlandhar 1, Jalandhar, India - 144021	Latitude: Not Available Longitude: Not Available																					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License Registration No. JAL0FL8496, Valid till 31-12-2022.																						
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Facility is in to Manufacturing of sports goods.																						
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>M/s SPORTING SYNDICATE INTERNATIONAL PVT. LTD. is a private limited firm located at Village – Wariyana, Kapurthala Road, Jalandhar, Punjab. The total land area occupied by the facility is 10612 Square meters. And the covered area is 1400 Square meters including all floors. The Facility was established in Year July 2020:</p> <table border="1"> <thead> <tr> <th>Production Building no-02</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Basement</td> <td>Raw Storage, Office Area</td> <td>None</td> </tr> <tr> <td>Ground Floor</td> <td>Office Area</td> <td>None</td> </tr> <tr> <td>First Floor</td> <td>Mezzanine floor, Finishing Area,</td> <td>None</td> </tr> <tr> <td>Second Floor</td> <td>Stacking area, Packaging Area</td> <td>None</td> </tr> <tr> <td>Is this a shared building?</td> <td>Packed goods Storage.</td> <td>None</td> </tr> <tr> <td>First Floor</td> <td>Garment</td> <td>None</td> </tr> </tbody> </table>		Production Building no-02	Description	Remark, if any	Basement	Raw Storage, Office Area	None	Ground Floor	Office Area	None	First Floor	Mezzanine floor, Finishing Area,	None	Second Floor	Stacking area, Packaging Area	None	Is this a shared building?	Packed goods Storage.	None	First Floor	Garment	None
Production Building no-02	Description	Remark, if any																					
Basement	Raw Storage, Office Area	None																					
Ground Floor	Office Area	None																					
First Floor	Mezzanine floor, Finishing Area,	None																					
Second Floor	Stacking area, Packaging Area	None																					
Is this a shared building?	Packed goods Storage.	None																					
First Floor	Garment	None																					

		Stitching, Finishing and Packaging + Football & Rugby Finishing & Packaging.	
	Second Floor	Lamination, Cutting, Printing and Stitching for Rugby and Football + Garment Stitching, Cutting, Finishing and Packaging.	None
	Is this a shared building?	No	None
	Production Building no-03	Description	Remark, if any
	Ground Floor	Garment Finishing and Packaging.	None
	First Floor	Garment Cutting and Stitching.	None
	Is this a shared building?	No	None
	Production Building no-04	Description	Remark, if any
	Ground Floor	Tool Room and Scrap Storage.	None
	First Floor	Raw material Storage.	None
	Periphery	Utility, Crèche, Chemical Store and rugby	None

	<table border="1" data-bbox="639 219 1469 322"> <tr> <td data-bbox="639 219 919 255"></td> <td data-bbox="919 219 1182 255">passing area</td> <td data-bbox="1182 219 1469 255"></td> </tr> <tr> <td data-bbox="639 255 919 322">Is this a shared building?</td> <td data-bbox="919 255 1182 322">No</td> <td data-bbox="1182 255 1469 322">None</td> </tr> </table> <p data-bbox="639 353 1414 389">F1: Visible structural integrity issues (large cracks) observed?</p> <p data-bbox="639 389 727 421"><input type="checkbox"/> Yes</p> <p data-bbox="639 421 719 452"><input checked="" type="checkbox"/> No</p> <p data-bbox="639 452 932 483">F2: Please give details:</p> <p data-bbox="639 483 1362 515">F3: Does the site have a structural engineer evaluation?</p> <p data-bbox="639 515 727 546"><input type="checkbox"/> Yes</p> <p data-bbox="639 546 719 577"><input checked="" type="checkbox"/> No</p> <p data-bbox="639 613 1469 972">F4: Please give details: facility has not obtained their approved building layout plan on the name of M/s Sporting Syndicate International Pvt.Ltd." However, it was noted that facility has approved building layout plan on the name of M/s Sporting Syndicate Pvt. Ltd." Facility has changed their name from M/s Sporting Syndicate Pvt. Ltd." To M/s Sporting Syndicate International Pvt.Ltd." Further facility has not done any changes in building structure. Further, facility had obtained certificate of incorporation on January 15, 2020 and building stability certificate from component structural engineer on dated 12-12-2018</p>		passing area		Is this a shared building?	No	None
	passing area						
Is this a shared building?	No	None					
G: Site function:	<p data-bbox="639 1034 764 1066"><input type="checkbox"/> Agent</p> <p data-bbox="639 1066 1115 1097"><input checked="" type="checkbox"/> Factory Processing/Manufacturer</p> <p data-bbox="639 1097 1007 1128"><input type="checkbox"/> Finished Product Supplier</p> <p data-bbox="639 1128 780 1160"><input type="checkbox"/> Grower</p> <p data-bbox="639 1160 847 1191"><input type="checkbox"/> Homeworker</p> <p data-bbox="639 1191 887 1223"><input type="checkbox"/> Labour Provider</p> <p data-bbox="639 1223 834 1254"><input type="checkbox"/> Pack House</p> <p data-bbox="639 1254 904 1285"><input type="checkbox"/> Primary Producer</p> <p data-bbox="639 1285 890 1317"><input type="checkbox"/> Service Provider</p> <p data-bbox="639 1317 887 1348"><input type="checkbox"/> Sub-Contractor</p>						
H: Month(s) of peak season: (if applicable)	Consistent business throughout the year.						
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<ul data-bbox="639 1487 1430 1783" style="list-style-type: none"> •The facility is involved in the manufacturing of sports goods. •The main production processes are listed as follows: Cutting – Sewing/ Moulding – Printing – Finishing – Packaging and Dispatch •The main equipment used by the facility for the production process are Injection moulding, stitching, power press, Laser, Printing. 						
J: What form of worker representation / union is there on site?	<p data-bbox="639 1809 858 1841"><input type="checkbox"/> Union (name)</p> <p data-bbox="639 1841 927 1872"><input checked="" type="checkbox"/> Worker Committee</p> <p data-bbox="639 1872 874 1904"><input type="checkbox"/> Other (specify)</p> <p data-bbox="639 1904 754 1935"><input type="checkbox"/> None</p>						
K: Is there any night production work at	<input type="checkbox"/> Yes						

the site?	<input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details : Not Applicable

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:40 am Day 1 Time out: 06:00 pm	A3: Day 2 Time in: 09.45 am A4: Day 2 Time out: 5 :45 pm	Day 3 Time in: NA Day 3 Time out: NA
B: Number of auditor days used:	2 Man-day (1Auditor X 2 days)		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks - 10 th Jan 2022 to 10 th Feb 2022 <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Dinesh Kumar Sharma – Factory Manager		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	Not Applicable		
J: Previous audit type:	Not Applicable		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker representative was not present in the opening meeting and closing meeting. As they were busy in production activity.		
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No Union exists.		

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	231	00	00	00	00	00	00	231
Worker numbers – female	184	00	00	00	00	00	00	184
Total	415	00	00	00	00	00	00	415
Number of Workers interviewed – male	14	00	00	00	00	00	00	14
Number of Workers interviewed – female	12	00	00	00	00	00	00	12
Total – interviewed sample size	26	00	00	00	00	00	00	26



A: Nationality of Management	Indian	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u>Indian</u></p> <p>B2: Nationality 2: _____</p> <p>B3: Nationality 3: _____</p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: No Peak Season declared by the facility.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u>100%</u> Indian _____</p> <p>C1: approx % total workforce: Nationality 2 _____</p> <p>C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: <u>0</u>% workers on piece rate</p> <p>D1: <u>0</u>% hourly paid workers</p> <p>D2: <u>100</u>% salaried workers</p> <p>Payment cycle:</p> <p>D3: <u>0</u>% daily paid</p> <p>D4: <u>0</u>% weekly paid</p> <p>D5: <u>100</u>% monthly paid</p> <p>D6: <u>0</u>% other</p> <p>D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	04 group of 5 Employees
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male:4 D2: Female: 2
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	Employees do not have any complaints.
I: What did the workers like the most about working at this site?	Facility has provided the salary on time.
J: Any additional comment(s) regarding interviews:	None
K: Attitude of workers to hours worked:	Good
L. Is there any worker survey information available?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:	
M: Attitude of workers: <i>(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk</i>	
26 workers (Male-14 and female-12) were selected for interview, 20 workers were interviewed as 4 groups of 5	

employees and balance 6 workers were interviewed individually.

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 team leaders 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.

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

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

Based from the interaction with workers committee representative, it was noted that workers committee representative are not discriminated and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received.

O: Attitude of managers:

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

The facility management was found to be cooperative throughout the audit and accepted to take necessary corrective action for the non-compliances noted.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems

1. Based on review of records facility has established a policy covering human rights impacts and issues.
2. Mr. Dinesh Kumar Sharma – Factory Manager is responsible for implementing standards concerning Human rights.

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

Details:

1. Interaction with Management and Interview with employees.
2. Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
 3. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
 4. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

Any other comments: None

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has policy on human rights.</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Mr. Dinesh Kumar Sharma Job title: Factory Manager</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility has provided a following grievance mechanism for confidential reporting and anonymously without fear of retaliation any breaches of policies and procedures.</p> <ol style="list-style-type: none"> 1. Workforce Representative 2. Prevention of Sexual Harassment committee Representative 3. Grievance Redressal committee Representative
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has "Data Privacy policy" and ensure all worker, supplier and customer information is confidential.</p>

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

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

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: __5__ %	A2: This year __5__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: __3__ %	C2: This year __3__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	5	
E: Are accidents recorded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please describe: Facility had maintained Form-26 & 26A, however no accidents were occurred till date.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2020 Number: Nil	F2: This year: 2021 Number: Nil
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 Nil	H2: This year: 2021 Nil
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __00__% workers	I2: 12 months __00__% workers
J: % of workers that work on average more than 60 total hours / week in the	J1: 6 months __00__% workers	J2: 12 months __00__% workers

last 6 / 12 months:		
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0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Based from facility tour and review of records, facility has implemented the ETI base code and the code has been displayed in notice board and communicated to all the employees during induction training.
2. Mr. Dinesh Kumar Sharma is responsible for compliance with the code.
3. The ETI based code was posted on-site for employees review.
4. The facility had set up policy and appointed one staff to update labor law requirements

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

Details:

- Facility Policy and Procedures
- Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
- Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

Any other comments: None

Management Systems:	
<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: The site has not been subjected to any fines/prosecutions for non-compliance to any regulations till date.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The facility has established the policies and procedure on forced labour, child labour, discrimination, harassment & abuse. And these policies were displayed on notice board in local language (Hindi) and communicated to all employees.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Facility has effectively implemented the social compliance system and ensuring the same by conducting an audit in a periodic manner, necessary corrective and preventive action has been taken by the facility for the non-compliance raised during the audit. Further the report of the same was maintained by the facility.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All employees were given an induction training where social compliance policies and procedures were explained.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Based on interaction with the employees, the training provided found effective.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility has certification of ISO 9001:2015 & the same is Valid till June-2024.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has dedicated HR department to take care of HR activities.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mr. Dinesh Kumar</p>

	Sharma- Factory Manager.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility has "Data Privacy policy" to ensure all worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility has a system to ensure the same whether the information was shared on a need to know basis only.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has conducted risk assessment to evaluate policy and procedure effectiveness.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility has a policy which requires labour standards of its own suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: Please give details: facility has not obtained their approved building layout plan on the name of M/s Sporting Syndicate International Pvt.Ltd." However, it was noted that facility has approved building layout plan on the name of M/s Sporting Syndicate Pvt. Ltd." Facility has changed their name from M/s Sporting Syndicate Pvt. Ltd." To M/s Sporting Syndicate International Pvt.Ltd." Further facility has not done any changes in building structure. Further, facility had obtained certificate of incorporation on January 15, 2020.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility have systems in place to conduct legal due diligence to recognize and apply national laws and

	practices relating to land title.
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>P1: If yes, how does the company obtain FPIC: Facility have written policy and procedures specific to land rights.</p>
<p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Q1: Please give details: Facility has compensated the owner for the land prior to the facility being built.</p>
<p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>R1: Please give details: Facility is located in industrial zone land.</p>
<p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>S1: Please give details: Not Applicable</p>

Non-compliance:

1. Description of non-compliance:

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

It was noted from review of records that facility has not obtained their approved building layout plan on the name of M/s Sporting Syndicate International Pvt.Ltd." However, it was noted that facility has approved building layout plan on the name of M/s Sporting Syndicate Pvt. Ltd." It was 'partial' compliance because facility has approved building layout plan. Facility has changed their name from "M/s Sporting Syndicate Pvt. Ltd. to M/s Sporting Syndicate International Pvt.Ltd." Further facility has not done any changes in building structure. Further, facility had obtained certificate of incorporation on January 15, 2020.
Hence it is rated "partial" compliance.

Local law: -

In accordance with The Punjab Factory Rules 1952 (6) of the Act] Approval of Plans, 2) No addition/alteration or extension in the existing factory building shall be made unless plans in respect of such additions, alterations or extensions are approved by the Chief Inspector

Recommended corrective action:

It is recommended to facility to obtain approved layout plan as per current name of the facility.

Objective evidence observed:

During the review of records

Action by: Mr. Dinesh Kumar Sharma- Factory Manager Timescale: 90 days Verification Method: Desktop	
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Observation:	
Description of observation: None Observed Local law or ETI requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable

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

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. The factory has a policy which prohibits forced labour and this was available for review.
- 2. There was a non-formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
- 3. The employee handbook – given to all workers on joining, states that workers within their probation period are free to leave without any notice and once a worker is permanent (this is out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also states that they will be given their full wages on their last day of work.
- 4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- 5. The factory did not require any payment for work tools, PPE, IC/staff card, training, etc.
- 6. The factory did not use prison labour.
- 7. The above was confirmed in management and employee interview.

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

Details:

- 1. Personnel files
- 2. Resignation records of recent 3 months
- 3. Factory rules
- 4. Employee handbook
- 5. Management and employee interview

Any other comments: None

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

- Yes
- No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation

- Yes
- No

	B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Employees are free to leave their job by giving one month notice period.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Employees are free to leave their workplace without any restriction at the end of the work day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected:
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable H1: Please describe finding: Facility does not involve on any forced / trafficked labour.

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law: NC against customer code:
 None Observed

Local law and/or ETI requirement

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

Not Applicable

Observation:	
Description of observation: Non Observed Local law or ETI requirement: Not Applicable Comments: Not Applicable	Objective evidence observed: Not Applicable

Good Examples observed:	
Description of Good Example (GE): Non Observed	Objective evidence observed: Not Applicable

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

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

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ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. There is no union at the site
- 2. There is workers committee at the site, worker representatives were elected by employees.
- 3. Based from employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.
- 4. Facility has formed a Workers Committee and Grievance committee and conducted meetings once in three month and the minutes of meetings are recorded for verification and future reference.
- 5. Based from employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities.
- 6. Based from the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis.

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

Details:

- 1. Social compliance system program and procedure
- 2. Suggestion box complain feedback
- 3. Meeting minutes
- 4. Works Committee Minutes dated 16/12/2021
- 5. Grievance Committee Minutes dated 10/12/2021
- 6. Employee interview and management interview
- 7. Employee handbook and employment contracts were reviewed. They both stated that employees are free to form trade unions. Nobody will be treated differently whether they are members of the union.

Any other comments: None

<p>A: What form of worker representation/union is there on site?</p>	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: Please give details: Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: Based from the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>Not Applicable. No union existed in facility.</p>	<p>F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Worker Committee existed in facility.</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Mr. Prem Lal</p>
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Date of last election: 29.01.2021</p>
<p>J: Do workers know what topics can be raised with their representatives?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>K: Were worker representatives/union representatives interviewed?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 01	
<p>L: Please describe any evidence that union/worker's committee is</p>	<p>Facility had conducted last meeting on December 16th, 2021 Topics discussed during the committee meeting were regarding COVID 19</p>	

effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	and cleaning at workplace.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: __00__% workers covered by Union CBA	M2: __00__% workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable	

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

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. General Health and Safety management

- Mr. Dinesh Kumar Sharma is responsible for Health & Safety aspects for the site
- Potable water was freely available in all areas and test certificates were up-to-date
- Sufficient clean toilets segregated by gender were available at all times to employees
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are monthly meetings between the workers and the Facility management, and each point is acted on.

2. Fire Safety

- There were at least 2 exits from each work area and these were clearly marked
- Fire fighting equipment like fire extinguishers, fire hydrant, sprinkler system, fire buckets, fire alarm call point were provided in the facility which was found sufficient
- Evacuation diagrams were posted in all areas and understood by all workers interviewed
- Fire drills were organized and recorded. Last done on 22.11.2021
- Facility has marked all the exits and emergency exits in a language understood by majority of the employees.

3. Machine & Electrical safety

- All machine and electrical equipment was maintained in good condition.
- There were competent mechanic & electricians at the site to do the electrical work
- Facility had obtained periodic inspection certificate for all the machineries used

4. Chemical safety

- All chemicals were correctly labelled
- Material Safety Data Sheets were available for the chemicals used by the facility

5. Medical services

- Facility has provided well equipped first aid boxes in each production area (Total 8 first aid box) and they were well stocked as required by law
- There were 10 first aiders and they had been trained through St. John Ambulance Association.

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

Details:

- Health and Safety Policy
- Fire License – valid till 21.06.2022.
- Stability Certificate dated 12/12/2018 which is valid until no change in structure.
- Industrial accident records – Updated till Decemeber-2021
- Generator (125 KVA) Installation Certificate
- First aid training was provided to 10 employees and obtained the certificate from St. John Ambulance Association dated 14/12/2020 which is valid for current year.
- Health & Safety Committee meeting minutes dated 06/12/2021
- Drinking Water Test report dated 13/11/2021
- Fire Drill conducted last on 22.11.2021
- Interaction with Management and Interview with employees

Any other comments:

None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility had included the social compliance policies in worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: Facility had maintained the approved plant layout as per the current setup of the building from inspector of factories.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please give details: Facility visitors are informed on H&S and provided with appropriate personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: Not applicable as the facility has less than 500 employees.</p>
<p>F: Is there a doctor or nurse on site or</p>	<p><input type="checkbox"/> Yes</p>

there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> No F1: Please give details: Not applicable as the facility has less than 500 employees.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Not applicable as facility does not provide transport to employees.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Not applicable as facility does not provide living space to employees.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility has conducted H&S risk assessment which includes evaluating the arrangements for workers doing overtime e.g. driving after a long shift.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: 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:

1. Description of non-compliance:

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

Based from tour of the facility it was noted that facility had not provided secondary containment to Ink container used and store in printing section at second floor.

Local law :-

In accordance with Punjab Factory Rules 1952 as applicable to Haryana, Rule 67-K[Framed U/S 41-B & 112 of the Act] Disclosure of information to workers (1) The occupier of a factory carrying on a hazardous process shall supply to all workers the following information in relation to handling of hazardous materials o substances in the manufacture, transportation, storage and other processes (f) measure to be taken by the workers to ensure safe holding, storage and transportation of hazardous substances.

ETI requirement: -

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

Objective evidence observed:

During the factory tour

Non-compliance photo # 1

steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

It is recommended to facility to provide secondary containment to all chemical containers at storage and using area.

Action by: Mr. Dinesh Kumar Sharma – Factory Manager

Timescale: 30 days

Verification Method: Desktop

2. Description of non-compliance:

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

It was noted from tour of the facility that 02 out of 07 employees were working on screen printing section at second floor in building no.1 were found using cotton hand gloves instead of rubber hand gloves. It was 'partial' compliance because facility has provided PPE to all the employees working in screen printing process however 02 employees were not using rubber hand gloves.

Local law: -

In accordance with 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 Facility. (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 Facility that are safe and without risks to health, (b) the arrangements in the Facility 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.

ETI requirement: -

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

Recommended corrective action:

It is recommended to facility to provide appropriate gloves to all concern employees working in screen printing section

Action by: Mr. Dinesh Kumar Sharma – Factory Manager

Timescale: 30 days

Verification Method: Desktop

Objective evidence observed:

During the factory tour

Non-compliance photo #2

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

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- 1. Based from interaction with the factory management, all employees are hired by the Human Resource Department only.
- 2. Based from review of hiring policy documents, employee's ID for age proof such as Voter ID, Aadhar Card, and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired.
- 3. Based from the policy review, the minimum hiring age of the facility is above 18 years old.
- 4. Based from employees' interview, any suspect of child labour can be reported to facility management.
- 5. Based on the employee interviews, review of facility's Anti Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

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

Details:

- Child Labor and Child Labor Remediation Policy.
- Age Proof records of 26 out of 26 selected samples.
- Interaction with Management and Interview with employees.

Any other comments: None

A: Legal age of employment:	14 Years old for young employees and 18 years old for adult workers
B: Age of youngest worker found:	22 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 %

<p>E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details Not Applicable</p>
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Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>
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Observation:

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

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

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Based from review of wage records, the facility has paid the applicable minimum wages to all the employees.
2. Based from employee's interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month.
3. Based from employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
4. Based from wage record review, all employees are covered under social security benefit of Employees provident fund, employees state insurance and welfare fund
5. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
6. Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages.

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

Details:

- Document review
- Employee interview
- Local and national laws
- Wages and benefits policy
- Local legal minimum wage documents
- Payroll & Time records for 03 selected months December -2021 (Current month), August-2021 (random month) & march-2021 (random month) were reviewed.
- Leave with wage records (Form No: 15) and Leave encashment records.
- Social insurance and payment receipts from the local labor department
- Labor contracts for all employees (to examine agreed wage rates)
- Resignation records
- Pay slips of all employees interviewed
- Quality and production records to cross check hours
- Full and final Settlement, leave with wage register and Gratuity paid records.

Any other comments:
None

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:
None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed: Not Applicable

Observation:

Description of observation:

It was noted that, facility has paid arrear payment for revised minimum wages as per minimum wage notification dated 30/11/2021 with effective from 1/9/2020 to all the eligible employees on 6 January 2022 in cash instead of bank transfer.

Local law or ETI requirement:

In accordance with PUNJAB GOVT. Gaz, July 17,2015 (ASAR 26, 1937 SAKA) PART III, Government Of Punjab, Department Of Labour Notification The 3rd July, 2015 No.S.O. 31/C.A \$/1936/S.6/2015-In exercise of the powers conferred under section 6 of the Payment Of Wages Act, 1936 (Central Act 4 of 1936), and all other powers enabling him in this behalf, the governor of Punjab is pleased to specify that in all the factories registered under The Factory Act, 1948 and all shops and commercial Establishment Act 1958, the employers shall pay to the persons employed therein, the wages either by cheque or by crediting the wages in their bank accounts.

Comments:

It is recommended to facility to pay all wages either by cheque or by crediting the wages in their bank accounts.

Objective evidence observed:

Noted during the review of records and interaction with the management and employees.

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective Evidence Observed: Not Applicable

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 08 hour per day / 48 hours per week	A1: 08 hour per day / 48 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 02 hour per day / 12 hours per week	B1: 00 hours/day, 00 hours/week, 00 hours/ Month (Current Month)	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: The local legal minimum wages applicable in the state of Punjab from 01.09.2020 is as under Unskilled: INR 9192.72 Semi-Skilled: INR 9972.72 Skilled: INR 10869.72 Highly Skilled: INR 11901.72	C1: Unskilled: INR 9192.72 Semi-Skilled: INR 9972.72 Skilled: INR 10869.72 Highly Skilled: INR 11901.72	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of normal rate of wages	D1: No overtime was done by any of the employees in any of the sampled month.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
A1: If No , why not?	Not Applicable		
B: Sample Size Checked <i>(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)</i>	26 attendance records and payroll records for December-2021 (Current month), 26 attendance records and payroll records for August-2021 (Random Month) 26 attendance records and payroll records for March-2021 (random month) were reviewed in this audit.		
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: Unskilled: INR 9192.72 Semi-Skilled: INR 9972.72 Skilled: INR 10869.72 Highly Skilled: INR 11901.72	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If No , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> Helper - 9193	
F: Please indicate the breakdown of workforce per earnings:	F1: <u> 0 </u> % of workforce earning under minimum wage F2: <u> 90 </u> % of workforce earning minimum wage F3: <u> 10 </u> % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc</i> 8.33% of their total salary was provided to all the employees as bonus		
H: What deductions are required by law e.g. social insurance? Please state all types:	Provident Fund (PF), Employee State Insurance (ESI) and Labour Welfare Fund (LWF)		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. N/A 2. Please describe:

		I2: Please list all deductions that have not been made.	1. Nil 2. Nil Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Facility has implemented electronic thumb impression system to record the In/out time of employees. No inconsistency was found during the audit.	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Records reflect all time worked.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: Facility did not define any living wages. At present facility is following the applicable minimum wages as notified by the State Government.		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details:		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: State Government will revise the minimum wages on the month of March & September of every year and the same will be paid to the employees accordingly.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

	P1: Please give details:
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive
[\(Click here to return to summary of findings\)](#)
[\(Click here to return to Key Information\)](#)

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records were verified.

2. Based on provided attendance records, the working hours analysis as below:

a) During employee interview, all the 26 randomly selected employees stated that no overtime is done by them.

- b) The facility has implemented electronic time recording system to record IN/OUT time recording for all the employees including contractor employees.
- c) Based on the provided attendance records, the status of overtime hours in sample was as below.
- 0 hours / day in December-2021 (Current Month)
 - 0 hours / day in August-2021 (Random Month)
 - 0 hours / day in March-2021 (Random Month)

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

Details:

- Facility Policy.
- In/Out time records and Salary register for 26 selected samples for 03 Random months.
- Interaction with management and Employees.
- Sample pay slips with recorded hours all employees interviewed
- Employees contracts
- Quality and production records to cross check hours.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed: Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed: Not Applicable

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

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)	
Systems & Processes	
A. What timekeeping systems are used: time card etc.	Describe: The facility has implemented electronic time recording system to record IN/OUT time recording for all the employees.
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not Applicable
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If YES, please complete as appropriate:
	<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
	If "Other", Please define:
	Not Applicable
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: Not applicable
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain: F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No In accordance with Factories Act 1948, Chapter VI, Section 52 (1), No adult worker shall be required or allowed to work in a factory on the first day of the week (hereinafter referred to as the said day) unless-

		<p>(a) He has or will have a holiday for a whole day on one of the three days immediately before or after the said day, and</p> <p>(b) The manager of the factory has, before the said day or the substituted day under clause (a) whichever is earlier, -</p> <p>(i) Delivered a notice at the office of the Inspector of his intention to require the worker to work on the said day and of the day which is to be substituted, and</p> <p>(ii) Displayed a notice to that effect in the factory: Provided that no substitution shall be made which will result in any worker working for more than ten days consecutively without a holiday for a whole day.</p>
	Maximum number of days worked without a day off (in sample):06 days	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: Not Applicable
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: Not Applicable
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: <ul style="list-style-type: none"> - 0 hours / day in December-2021 (Current Month) - 0 hours / day in August-2021 (Random Month) - 0 hours / day in March-2021 (Random Month) 	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	___0__%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements :

		Overtime is voluntary and the employees can refuse the overtime.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<p>M1: Please give details of normal day overtime premium as a % of standard wages:</p> <p>Factory has policy to pay the overtime at 200% of the ordinary rate of wages. However No overtime was done by any of the employees in any of the sampled month.</p>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: If yes, please describe % of workers & frequency:</p> <p>Factory has policy to pay the overtime at 200% of the ordinary rate of wages. However No overtime was done by any of the employees in any of the sampled month.</p>
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	Not Applicable	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify)	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	NA	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details:	
R: If sufficient workers	<input checked="" type="checkbox"/> Yes	

cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> No
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7: No Discrimination is Practiced
[\(Click here to return to summary of findings\)](#)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. Based from review of wage records and employees interview, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
2. Mr. Dinesh Kumar Sharma – Factory Manager is responsible for the investigation and disposal of discrimination case.
3. Based from wage records review, the facility provides the same pay for male/female employees for same work of similar nature.
4. No employee was required to do the examination of the Pregnancy, hepatitis B virus and HIV.
5. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.
6. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
7. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
8. There was no evidence of sexual harassment.

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

Details:

- Facility Policy.
- The hiring and termination procedure, leave application records and employee handbook.
- Time in and out records, full and final settlement records and training records.
- Appointment letter with terms and conditions for 26 out 26 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees

Any other comments: None

<p>A: Gender breakdown of Management + Supervisors (Include as one combined group)</p>	<p>A1: Male: <u>66</u> % A2: Female <u>44</u> %</p>
<p>B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:</p>	<p>2</p>
<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: </p>

<p>Professional Development</p>	
<p>A: What type of training and development are available for workers?</p>	<p>Facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.</p>
<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: </p>

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

Observation:

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

<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: Not Applicable</p>
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8: Regular Employment Is Provided

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

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

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

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

Current systems:

1. Based on record review and employee's interview appointment letters issued to all 26 out of 26 selected employees.

2. Based from interaction with the facility management, it was noted that all employees are employed on regular basis and through contractor; and no casual, agency and apprentice employees were engaged.

3. Facility does not employ any migrant workers.

4. Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process

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

Details:

- Facility Policy.
- Appointment letter with terms and conditions for 26 out 26 selected samples.
- Salary and other benefit records.

- Interaction with management and Employees.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI NC against Local Law NC against customer code:
None Observed

Local law and/or ETI requirement:
Not Applicable

Recommended corrective action:
Not Applicable

Objective evidence observed: Not Applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed: Not Applicable

Responsible Recruitment

All Workers

A: Were all workers presented with terms of employment at the time

- Terms & Conditions presented
- Understood by workers

of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Not Applicable	
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected:	
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:	
D: If any checked, give details:	Not Applicable	

Migrant Workers:

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

A: Type of work undertaken by migrant workers:	Not Applicable	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used:	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not Applicable	C2: Observations:

<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: Not Applicable</p>
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NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: No Agency workers found working in the facility. Hence this section is not applicable.
B: Were agency workers' age / pay / hours included within the scope of	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

Contractors:

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

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

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

At present, Facility is not using any Subcontractor.
The facility does not use home workers.

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

- Facility Policy.
- Inward and out ward material register.
- Production records.
- Interaction with management.

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

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

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

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

Details:

Non-compliance:

1. Description of non-compliance:

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

None Observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence

observed: Not Applicable

Observation:

Description of observation: None Observed

Local law or ETI/Additional elements requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence

observed: Not Applicable

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective Evidence

Observed: Not Applicable

Summary of sub-contracting – if applicable

Not Applicable please x

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

- Yes
 No

A1: Please describe:

Based on review of production records, the capacity with workers work load found balanced, hence no chance of unrecorded work hours.

B: If sub-contractors are used, is there evidence this has been

- Yes
 No

agreed with the main client?	B1: If Yes , summarise details: Not Applicable
C: Number of sub-contractors/agents used:	Not Applicable
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: Not Applicable
E: What checks are in place to ensure no child labour is being used and work is safe?	Not Applicable

Summary of homeworking – if applicable
 Not Applicable please x

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

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9: No Harsh or Inhumane Treatment is Allowed

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

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility had invited NGO in Anti sexual harassment committee and the grievance was directly to them if any.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Facility Internal Complaint committee representative will communicate the details to their employees in their respective section and workers are aware of these channels and have access to the same.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Direct communication during meeting</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, Committee meetings etc.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

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

Current Systems and Evidence Examined

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

Current systems:

1. Based from 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.
2. According to the documentation, the facility management had established a disciplinary procedure for employees' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure
3. As per management interview, document review and employees' interview, there was a policy on Harsh Treatment.
4. There is an internal process for grievance and suggestion box has been provided, where employees can report a grievance (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system.

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

Details:

- Facility Policy
- The relevant policy on prevention of harassment and abuse
- Internal grievance procedure documentation.
- Training records
- Interaction with management and Employees

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None Observed

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed: Not Applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed: Not Applicable

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective Evidence Observed: Not Applicable

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

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

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

1. Based from the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.
2. Based from the review of employee personal files, all the employees are holding the legal rights to work.

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

Details:

- Hiring procedure
- Personnel files
- Employee handbook
- Interaction with Management and Employees

Any other comments: None

Non-compliance:

1. Description of non-compliance:

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

None Observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence

observed: Not Applicable

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

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility has established and maintained environmental policy & Mr. Dinesh Kumar Sharma – Factory Manager is responsible for environmental aspects.
2. The facility had obtained the environment impact assessment report, environmental impact approval and environmental protection acceptance check.

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

Details:

- Facility Policy.
- Facility had obtained NOC from pollution department on 1/1/2022.
- Air Ambient quality test conducted on 06/12/2021
- Noise test conducted on 06/12/2021
- Air emission test conducted on 06/12/2021
- Interaction with management and Employees.

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

None Observed

Objective evidence

observed: Not Applicable

Local law and/or ETI/Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Observation:

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

<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: Not Applicable</p>
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Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
<p>0.A. Guidance for Observations</p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p> <p>0.2 Suppliers shall appoint a senior member of</p>	

<p>management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.</p>	
<p>ETI 1. Forced Labour</p>	<p>ETI 1. Forced Labour</p>
<p>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.</p>	
<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>	<p>ETI 2. Freedom of association and the right to collective bargaining are respected</p>
<p>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.</p>	
<p>ETI 3. Working conditions are safe and hygienic</p>	<p>ETI 3. Working conditions are safe and hygienic</p>
<p>3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 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</p>	

<p>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.</p>	
<p>ETI 4. Child labour shall not be used</p>	<p>ETI 4. Child labour shall not be used</p>
<p>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.</p>	
<p>ETI 5. Living wages are paid</p>	<p>ETI 5. Living wages are paid</p>
<p>5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 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.</p>	
<p>ETI 6. Working Hours are not excessive</p>	<p>ETI 6. Working Hours are not excessive</p>
<p>6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. 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</p>	

<p>be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:</p> <ul style="list-style-type: none"> - this is allowed by national law; - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; - appropriate safeguards are taken to protect the workers' health and safety; and - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. <p>6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.</p>	
<p>ETI 7. No discrimination is practised</p>	<p>ETI 7. No discrimination is practised</p>
<p>7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	
<p>ETI 8. Regular employment is provided</p>	<p>ETI 8. Regular employment is provided</p>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such</p>	

<p>obligations be avoided through the excessive use of fixed-term contracts of employment.</p> <p>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.</p>	
<p>8A: Sub-Contracting and Homeworking</p>	<p>8A: Sub-Contracting and Homeworking</p>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<p>ETI 9. No harsh or inhumane treatment is allowed</p>	<p>ETI 9. No harsh or inhumane treatment is allowed</p>
<p>9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<p>10. Other Issue areas: 10A: Entitlement to Work and Immigration</p>	
<p>Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.</p>	
<p>10. Other issue areas 10B2: Environment 2-Pillar</p>	

<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	
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SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
<p>Environment Section</p>	<p>Environment Section</p>
<p>B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.</p>	
<p>Business Practices Section</p>	

10C. Compliance Requirements

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

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

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

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

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

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

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.










10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.










10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.

Photo Form

Note: Due to technical issue in Camera time not captured in photos.

 <p>A white sign with red and black text. Text includes: GST #03ABDCS2G00K120, Sporting Syndicate International Pvt. Ltd., VILLAGE WARYANA, KAPURTHALA ROAD, JALANDHAR-144021 (PUNJAB). Date: 10/01/2022.</p>	 <p>A blue metal gate with vertical slats, partially open, leading to a paved area. Date: 10/01/2022.</p>	 <p>A multi-story blue and white building with a sign that says 'SPORTS SYNDICATE'. Date: 10/01/2022.</p>
<p>Facility Name Board</p>	<p>Facility main gate</p>	<p>Facility building</p>
 <p>Several documents or notices pinned to a blue tiled wall. Date: 10/01/2022.</p>	 <p>A white notice board with several papers pinned to it, standing on a blue metal stand. Date: 10/01/2022.</p>	 <p>A black electronic attendance machine with a keypad and a small display, mounted on a wall. Date: 10/01/2022.</p>
<p>Abstract Displayed</p>	<p>Notice Board</p>	<p>Attendance Machine</p>
 <p>An electrical control panel with a red digital display showing '1330 03' and a 'FIRE PANEL' label. Date: 10/01/2022.</p>	 <p>A red fire extinguisher mounted on a wall with a yellow and black striped warning sign. Date: 10/01/2022.</p>	 <p>A red metal stand with a yellow and black striped top, holding four red buckets. Date: 10/01/2022.</p>
<p>Centralised fire alarm panel</p>	<p>Fire extinguisher</p>	<p>Fire bucket</p>



Electrical panel	Chemical store	Eye wash station
		
Suggestion box	Toilet facility	Drinking water station
		
Raw Material store	Cutting section	Stitching section
		
Stitching section for balls	Ball / rugby section	Screen printing section

		
<p>Finishing and checking section</p>	<p>Packing section</p>	<p>Moulding section</p>
		
<p>Final packing section</p>	<p>Packed goods stored</p>	

Non-Compliance Photos: -

		<p>NA</p>
<p>1. Secondary containment not provided</p>	<p>2. Cotton gloves used instead of rubber gloves</p>	<p>NA</p>



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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

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