

Sedex Members Ethical Trade Audit Report





	Audit Details										
Sedex Company Reference: (only available on System)	-				Sedex Site Reference: (only available on Sedex System)			ZS: 173745823			
Business name (Company nam	ie):	Elegant	Elegant Fabrics								
Site name:		Elegant	Fabrics								
Site address: (Please include fu	ıll address)	Punj Puli, Lassani Road, Faisalabad, Pakistan			Country:	Country:			an		
Site contact and	d job title:	Mr. Abid Ali (Director)									
Site phone:	+92 300 8899000		Site e-mail:			ali@elegantfabricspk.com					
SMETA Audit Pilla	ars:	Standards Safe		ealth &			nent	Ви	usiness Ethics		
Date of Audit:		12.02.20)21	<u>. I</u>							
Audit Company Name & Logo: SGS Pakistan Private Limited SGS						Report Owner (payer): (If paid for by the customer of the site please remove for Sedex upload) Elegant Fabrics					
			Auc	dit Co	nducted By						
Affiliate Audit Company		Purchaser				Retailer					
Brand owner			NGO			□ Trac		e Unior	า		
Multi- stakeholder				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): Nil

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

Lead auditor: Wasim Gul Khan APSCA number: RA21704191

Lead auditor APSCA status: Registered Auditor

Team auditor: Nil

Interviewers: Wasim Gul Khan APSCA number: RA21704191
Report writer: Wasim Gul Khan APSCA number: RA21704191

Report reviewer: Rabia Saif

Date of declaration: 29-06-2021

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.

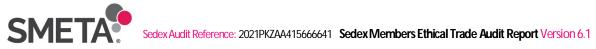
This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information 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.

Report reference: 9013888



Summary of Findings

to the	Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		Area of Non-Conformity (Only check box when there is a non- conformity, and only in the box/es where the non-conformity can be found)				d the nu ues by li		Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	LocalLaw	Additional Elements	Customer Code	NC	NC Obs GE		
0A	Universal Rights covering UNGP								
OB	Management systems and code implementation					03			NC: During workers interview it was evident that most of workers are not found aware about the social policies and procedures as well as grievance mechanism that how his /her complaints are resolved. Follow up audit dated 29-06-2021 Factory has provided the awareness to workers about the social policies and procedures as well as grievance mechanism. NC Status: Closed NC: Though factory has established the Policy and Procedure however documented Risk Assessment was not carried out as per requirement. Follow up audit dated 29-06-2021 Factory has carried out the policy and procedure risk assessment. NC Status: Closed



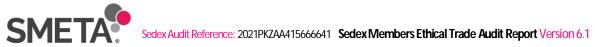
						• NC: Factory has not established the Corrective and Preventive Action mechanism to take the root cause investigation and Corrective & Preventive action against the non-compliances raised during external audit, as during document review it was evident that some of non-compliances are carried over Follow up audit dated 29-06-2021 Factory has established the Corrective and Preventive action & root cause analysis Procedures and recorded the corrective actions. NC Status: Closed
1.	Freely chosen Employment					
2	Freedom of Association			01		NC: During Document Review it was evident that Factory has not established the election of Worker management Council through ballot box as required by Law Follow up audit dated 29-06-2021 Factory has carried out the Election of WMC as per legal Requirement. NC Status: Closed
3	Safety and Hygienic Conditions			07		NC: During site tour, electrical wiring was found unsafe in generator area and office room as it was naked and uncovered. Moreover,



Electrical Panel was also fond blocked with Production table in stitching section. Follow up audit dated 29-06-2021 Factory has covered the electrical wiring of said departments. NC Status: Closed NC: Though Factory has obtained the Electrical Inspection Ref No. EIF/IS/36-ED-17 however detail electrical Inspection Report was not found available as required by Electrical Rules 1937. Follow up audit dated 29-06-2021 Factory has obtained the detailed electrical inspection report from approved authority. NC Status: Closed • NC: Though Factory has Carried out Risk Assessment, however. Risk level either Qualitative or Quantitative was not found documented against process hazards. Moreover, Risk associated with pregnant women was also not found conducted. Follow up audit dated 29-06-2021 Factory has conducted the risk assessment of female employees and documented the risk level through qualitative or quantitative. NC Status: Closed NC: During Interview it was evident that, Health and Safety committee members could not demonstrate the knowledge about the protocol



which is being adopt by organization during fire emergency. Follow up audit dated 29-06-2021 Factory has provided the training about safety protocol to health and safety committee. NC Status: Closed • NC: During Document Review it was evident that factory has not carried out the Medical Test (Hygiene Test) of employees as required by Law Section 23 of The Factories Act, 1934. Follow up audit dated 29-06-2021 Factory has conducted the medical test of all employees as per legal requirement. NC Status: Closed • NC: During Site Tour, it was evident the Factory store the Diesel Oil in powerhouse without Secondary Containment and MSDS. Follow up audit dated 29-06-2021 Factory has placed the secondary containment and display the MSDS under diesel drum. NC Status: Closed • NC: During Site Tour, it was noted that Vessels were not provided in Drinking water point and also Drinking water area was found uncleaned. Follow up audit dated 29-06-2021 Factory has placed the vessels and ensured the drinking water area neat / cleaned. NC Status: Closed



4	Child Labour			01	During Document Review, it was noted the Age Proof Documents i.e. CNIC (02 employees out of 10) was not found available. Follow up audit dated 29-06-2021 Factory has placed the age proof document of employees in personnel files. NC Status: Closed
5	Living Wages and Benefits			03	NC: During Review of Production Register, it was noted that factory was operational on weekly rest in the month of December 2020 (20th December 2020), but factory has not made Pament against working on such day. Follow up audit dated 29-06-2021 Factory has made payment against working on weekly rest. NC Status: Closed NC: It was noted during document review, that factory was not issuing the salary slips to employees. Follow up audit dated 29-06-2021 Factory has started issuing the salary slip of employees as per requirement. NC Status: Closed NC: During Review of Record, it was noted the Factory was not paying EOBI and PESSI of eligible employees as factory is paying EOBI



and PESSI only 20 employees instead of all employees Follow up audit dated 29-06-2021 Factory has paid EOBI and PESSI of all employees working currently in the facility. NC Status: Closed \boxtimes • NC: 6 **Working Hours** 01 There is some inconsistency between Production Record and Time Record was found as it was note during production record that factory was in operational on weekly rest in month of December i.e. 20.12.2020 but Time Record was showing that factory was not in Operational during this date. Follow up audit dated 29-06-2021 Factory has developed procedure to ensure integrity & consistency of record related to Payroll as per requirement NC Status: Closed 7 Discrimination П 8 Regular Employment П Sub-Contracting and A8 Homeworking 9 Harsh or Inhumane Treatment 10A **Entitlement to Work**



10B2	Environment 2-Pillar									
10B4	Environment 4-Pillar									
10C	Business Ethics									
Gener	General observations and summary of the site:									

Site Summary:

- > The products manufactured at this site is Home Textile
- Overall responsibility for meeting the standards is taken by Mr. Azhar Imran (HR & Compliance Officer)
- > The youngest worker on site was 20 -year-old.
- > There is no union at this factory.
- > Worker Management Council was present during the opening / closing meeting and audit as well.
- > There is 100 % male in management and among supervisor.
- > Site has consistent business throughout the year.
- > 10 workers were selected for interview including 08 males and 02 female employees; they were interviewed as 1 group of 04 and the balance of 06 workers were interviewed individually.
- > All workers said they were satisfied with their employment at the factory.
- > They also said they were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used.
- > 10 Records to show wages and hours were taken for 3 months (January 2021, July 2020 and March 2020)
- > Standard hours on site were on average 48 hours/month with 1 day off in every 7-day-period.
- Legal minimum wages are paid to all workers in accordance with local law.
- Correct OT rate were paid, Workers were paid 200% of minimum wage for normal OT hours, 300% for gazetted / festival holiday.

*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:	Elegant Fabrics					
B: Site name:	Elegant Fabrics					
C: GPS location: (If available)	GPS Address; 232 RB, Risalay Wala road, near cotton factory, Faisalabad Latitude: 31.4535149 Longitude: 73.0671896					
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Labour Certificate No. DLW/F/FSD/5535 NTN: 3612355-2 Note: All legal licenses are valid and do not require validity or expiry dates.					
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Home Textile					
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Elegant Fabrics is manufacturer and exporter of Home Textile established in 2010, Located at , Punj Puli, Lasani Road, Faisalabad, Total area of factory is 6600 sq. ft. Factory has one Production Building, Total area of factory is 57,241 Sq. Ft. This is Rental Building owned by (Sajjad Akbar) and having complex building consist of Ground and First Floor. Elegant Fabric Process carrying out in Ground floor on rental basis only whereas First Floor owned by Building owner. Audited area is only Ground Floor.					
	Production D Building no	escription)	1	Remark, if any		
	Ground Floor C	Fabric Stor Cutting, Sti Press, Pack Inishing.	tching,	Nil		
	Floor 3					
	Floor 4 Is this a shared					
	building?					
	For below, please add any extra rows if appropriate.					
	F1: Visible structural integ	grity issue:	s (large o	cracks) observed?		



	☐ Yes ☐ No F2: Please give details:
	F3: Does the site have a structural engineer evaluation? Yes No
	F4: Please give details: Facility has obtained building stability certificate "Form K" from Engineer M.H Rashid (Reg No. Civil 7793) and in this certificate above firm certified that they have carried out a detailed survey of the building and material which was found satisfactory.
G: Site function:	☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
H: Month(s) of peak season: (if applicable)	Consistent Business
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Products: (Home Textile) Main Operation (Home Textile)
тат ечиртен изеи)	Fabric Receiving → Cutting → Stitching → Checking→Final Inspection→ Packing → Dispatch
	Production Lines: 01
	Main Equipment Stitching Machine:04 Cutting machine: 01 Bailing Press: 01
	Sub-Contracting Services
	Nil
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee (Worker Management Council) ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	☐ Yes ☑ No



L: Are there any on site provided worker accommodation buildings e.g. dormitories	Yes No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	Yes No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	Yes No N1: If no, please give details: No Accommodation is provided



Audit Parameters								
A: Time in and time out	A1: Day 1 Time in: 09:15 A2: Day 1 Time out: 18:00	A3: Day 2 Time in: A4: Day 2 Time out:	A5: Day 3 Time in: A6: Day 3 Time out:					
B: Number of auditor days used:	01 MD (01 Auditor x 01 Day)							
C: Audit type:	☐ Full Initial ☐ Periodic (Last Audit conducted in Month of 05th January 2021) ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define							
D: Was the audit announced?	Announced Semi – announced: Window detail: 02 weeks weeks (03.02.2021 to 19.02.2021) Follow up dated 29-06-2021 02 weeks (29-06-2021 to 15-07-2021 Unannounced							
E: Was the Sedex SAQ available for review?	☐ Yes ☐ No E1: If No, why not?							
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If Yes , please capture detail in appropriate audit by clause							
G: Who signed and agreed CAPR (Name and job title)	Mr. Abid Ali (Director)							
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No							
I: Previous audit date:	05.01.2021							
J: Previous audit type:	SEDEX 4 pillar							
K: Were any previous audits reviewed for this audit	 ✓ Yes ☐ No ☐ N/A During Review of Previous Audit finding, it was observed that factory still has not taken the Corrective Action against Non-Compliances related to Health and Safety, Freedom of Association hence it is carried over. 							
Audit attendance	Manageme	ent Worker Renreser	ntativos					



	Senior manageme	nt	Worker Cor representa		Union representat	iives
A: Present at the opening meeting?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
B: Present at the audit?	⊠ Yes	□No	⊠ Yes	□No	☐ Yes	⊠ No
C: Present at the closing meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Worker Management Council was Present during Opening Closing Meeting and audit.					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No Labour Union is Exist- Factory has established Work Management Council in Parallel mean.					



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

Worker Analysis								
		Local			Migrant*		Total	
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	iotai
Worker numbers – Male	45	00	00	00	00	00	00	45
Worker numbers – female	05	00	00	00	00	00	00	05
Total	50	00	00	00	00	00	00	50
Number of Workers interviewed – male	08	00	00	00	00	00	00	08
Number of Workers interviewed – female	02	00	00	00	00	00	00	02
Total – interviewed sample size	10	00	00	00	00	00	00	10



A: Nationality of Management	Pakistani				
B: Please list the nationalities of all workers, with the three most common nationalities listed first. Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: Pakistan B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season? Yes No If no, please describe how this may vary during peak periods: Factory has no any peak season.			
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1100 C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	_			
D: Worker remuneration (management information)	D:% workers on piece rate D1:% hourly paid workers D2: _100% salaried workers Payment cycle: D3:% daily paid D4:% weekly paid D5:100% monthly paid D6:% other D7: If other, please give details				



Worker Interview Summary		
A: Were workers aware of the audit?	⊠ Yes □ No	
B: Were workers aware of the code?	⊠ Yes □ No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	01 Group of 04 workers	= 04
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 04	D2: Female: 02
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 - Regular Employment, under Responsible Recruitment	∑ Yes □ No If no, please give detail	s
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	☐ Favourable☐ Non-favourable☐ Indifferent	
H: What was the most common worker complaint?	All workers interviewed towards management	•
I: What did the workers like the most about working at this site?	Working environment, on time payment	
J: Any additional comment(s) regarding interviews:	Most workers enjoyed working at this factory, they felt they had sufficient work and had a good relationship with management in general	
K: Attitude of workers to hours worked:	Workers expressed that they sometimes wanted to work extra, to earn more money, however they could turn down overtime if they wanted	
L. Is there any worker survey information available?		



		_
☐ Yes ☐ No		
⊠ No		
L1: If yes, please give details:		

M: Attitude of workers:

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

10 workers were selected for interview including 08 males and 02 female employees; they were interviewed as 01 groups of 04 and the balance of 06 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 and managers who treated them with respect.

They could 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, such as food quality / health and safety to their worker representative who would take it to the worker management committee.

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

During audit interview was conducted with the members of "Worker Management Council" Worker representatives were found happy and comfortable with management attitude. Worker representatives did not share any negative information about the factory management.

O: Attitude of managers:

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

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had implemented a Health & Safety committee to take care of health and safety concerns. Mr.Azhar Imran (HR & Compliance Officer) is responsible for implementing legal and code standards and responsible to conduct internal audits. Management of the facility found very co-operative and positive towards audit process and showed commitment to fulfil all pointed out non-conformances on immediate basis

Report reference: 9013888



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:

- Facility has human rights policy and commitment to respect human rights.
- > Facility has designated person i.e. M. Azhar Imran (HR & Compliance Officer) is responsible for implementing standards concerning Human rights.
- > Suggestion and complaint boxes are mounted at several locations within the facility for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

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

Details:

- Human rights policy
- Employee training records
- Worker interviews

Any other comments:



A: Policy statement that expresses commitment to respect human rights?	Yes No A1: Please give details: Facility has written policy co	ommitment to respect
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	⊠ Yes □ No	
	Please give details: Name: Mr. Azhar Imran Job title: HR & Compliance	Officer
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?	Yes No C1: Please give details: Suggestion and complaint I several locations where wo concern anonymously	ooxes are mounted at rkers can report any
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	∑ Yes ☐ No D1: If no, please give details	S
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	 ∑ Yes ☐ No E1: Please give details: 	
Personal data confidentiali worker's employment conti		
Fir	udings	
Finding: Observation Company NC Description of observation:		Objective evidence observed:
Local law or ETI/Additional elements / customer specific requirement:		
Comments:		
Good examples observed:		



Description of Good Example (GE):	Objective Evidence Observed:
	Observed:



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: (2020) .5 %	A2: This year (2021) January and Fab. 2021 .2 %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1.1 %	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 1.2 %	C2: This year (2020) 1.3 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1.5	
E: Are accidents recorded?	Yes No E1: Please describe: Management keeps injury accident log	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: 2020 Number: 03	F2: This year: 2021 Number: 00
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	00	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 00	H2: This year: 2021 00
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 00% workers	I2: 12 months 00% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months00% workers	J2: 12 months 00% workers



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:

- Factory has established, documented, maintained and effectively communicated Social compliance policy and procedure in the factory. As per policy 'Elegant Fabrics is committed to provide a workplace environment complying and compatible with all applicable laws. The facility discourages discrimination, employment of child and forced labour, harassment/abuse or corporal punishment and all other activities that contradict with local laws and buyer's code of conduct''.
- Local government departments like Labour Department is conducting Annual inspections of factory. last visit conducted on dated 12.11.2020
- Facility management was found aware of local law requirements concerning, child labour, wages, hours of work, health and safety, environments etc. and has subscription of different law websites, recent update has been received from labour departments for revision of minimum wages (The Punjab Gazette 2019)
- Facility has appointed Mr. Azhar Imran (HR & Compliance Officer) to ensure implementation of local law and international labour standards requirement and during interview Mr. Azhar is found aware of all requirements.
- Facility is conducting internal audits on Bi-Annually basis to ensure effectiveness of social policy and procedure last internal audit was conducted on 15.12.2020
- Facility has displayed ETI base code in factory., however, Local law abstracts at production floor notice boards for worker awareness.
- The factory has taken written commitment from all its suppliers to comply with social compliance code of conduct.
- In the last 12 months, facility has not been subject to any fines / prosecution for noncompliance confirmed during management interviews
- Workers are Not found Trained on Social Polices based on ETI base code & labour law requirements as mentioned in NC section

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

Details:

- Social Compliance Management System Manual,
- Job Description of HR & Compliance officer
- Facility visit and check notices boards for communication of code with workers
- > Internal audits record
- Compliance Certificate



Any other comments:	
Management S	ystems:
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☐ No A1: Please give details:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No B1: Please give details: Policies exist for all areas that reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies exist for all areas (child labour, forced labour, Health and Safety, Living Wage, Working Hours, no harsh treatment, Environment and Business Ethics); these are communicated to workers via poster and quarterly trainings last was conducted dated 05.11.2020
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No D1: Please give details: Standards on 'Forced labour' and 'No harsh treatment' 'child labour were communicated to manager / workers though posters and bi-annual trainings last was conducted dated 05.11.2020.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	 ✓ Yes ☐ No E1: Please give details: ➤ Orientation training to all new hires. ➤ Monthly training sessions last was conducted on 05.11.2020 ➤ Workers were found familiar with facility policies during worker interviews
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).	☐ Yes ☐ No F1: Please give details:
G: Is there a Human Resources manager/department? If Yes, please detail.	✓ Yes☐ NoG1: Please give details: Mr. Azhar Imran (HR & Compliance Officer)
H: Is there a senior person / manager responsible for implementation of the code	⊠ Yes □ No



	H1: Please give details: Mr. Azhar Imran (HR & Compliance Officer)
I: Is there a policy to ensure all worker information is confidential?	☐ Yes ☐ No I1: Please give details: Worker information / personal files are kept under lock and key at HR office
J: Is there an effective procedure to ensure confidential information is kept confidential?	Yes No J1: Please give details: Worker information / personal files are kept under lock and key at HR office
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☐ Yes ☐ No K1: Please give details: Factory has not carried out Policy and procedure risk assessment.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☐ Yes ☐ No L1Please give details: Factory has not carried out Policy and procedure risk assessment
M: Does the facility have a policy/code which require labour standards of its own suppliers?	 ∑ Yes ☐ No M1: Please give details: Facility has developed supplier selection policy and procedure, which require them to adhere labour standards.
Land righ	ts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes No N1: Please give details: All Legal Documents like NTN, Labour Department Registration verified.
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?	Yes No O1: Please give details: Yes, site has systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	☐ Yes ☐ No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	☐ Yes ☐ No Q1: Please give details:



R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts? Yes No R1: Please give details:	
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint. Yes No S1: Please give details: No as building found.	ny illegal of land for facility
Non-compliance:	
O1. Description of non–compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: During workers interview it was evident that most of workers are not found aware about the social policies and procedures as well as grievance mechanism that how his /her complaints are resolved.	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement: Suppliers are expected to implement and maintain systems for delivering compliance to this Code. Recommended corrective action: It is recommended that Factory shall provide the awareness to workers about the social policies and procedures. Follow up audit dated 29-06-2021 Factory has provided the awareness to workers about the social policies and procedures as well as grievance mechanism. NC Status: Closed 2. Description of non-compliance:	Document Review and Worker Interview
It is recommended that Factory shall provide the awareness to workers about the social policies and procedures. Follow up audit dated 29-06-2021 Factory has carried out the policy and procedure risk assessment. NC Status: Closed 3. Description of non-compliance: NC against ETI/Additional Elements NC against Local Law NC against customer code: Factory has not established the Corrective and Preventive Action mechanism to take the root	
cause investigation and Corrective & Preventive action against the non-compliances raised during external audit, as during document review it was evident that some of non-compliances are carried over	

Local law and/or ETI requirement:



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

Recommended corrective action:

Factory shall establish the Corrective and Preventive action Procedure

Follow up audit dated 29-06-2021

Factory has established the Corrective and Preventive action Procedures & root cause analysis and recorded the corrective actions.

NC Status: Closed

Observation:	
Description of observation:	Objective evidence observed:
Local law or ETI requirement:	
Comments:	

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



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:

- > Factory has established, documented, maintained, and effectively communicated forced labour policy and procedure like Child Labour, Forced Labour, Health and Safety, Wages and Benefits. As per policy Elegant Fabrics sternly discourages forced labour all company's policies and procedures are very much compatible to the consent and free movement of the employees. Workers are not required to lodge ''deposit'' any kind of their (educational certificate), identity papers or any other personal belongings with the employer and are free to leave the company after reasonable notice.
- No prison labour was found working during facility visit.
- > Policy was communicated to the workers through notices, worker's handbook and orientation and in monthly awareness training sessions; last session was conducted on 03.11.2020
- > Facility allows employees to move freely within their designated work areas during work hours, including access to drinking water and toilet facilities.
- > Employees can leave the facility during extended meal periods or after work hours confirmed during 10 worker interviews.
- > Facility has assigned qualified person with responsibility for communicating, training, deploying and monitoring and ensuring the implementation of forced labour policy and procedure Mr. Azhar Imran (HR & Compliance Officer) is responsible person for policy communication, monitoring, training & Implementation.
- > Through workers interview it was confirmed that workers are free to leave factory at the end of their work shift, also workers can resign with one-month notice or salary in lieu.
- > No sign of force labour was found in the factory during workers interview, documents review and facility visit.
- > Factory has also communicated the policy to all its suppliers and contractor's records of acknowledgment reviewed during audit.
- > Employment contract was found in accordance with local law and in native language which was found maintained at worker's personal files.
- > No such long-term loan scheme is in practice which restricts employees from leaving the facility.
- > Facility is only retaining National identity cards and education certificate copies in employee's personal files no original documents are being retained as a condition of employment

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

Details:

- Personnel files (10 were checked)
- Resignation records
- Factory rules



Employee handbookManagement and worker inContracts for security guard	
Any other comments:	
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	☐ Yes ☐ No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	Yes No D1: Please describe finding:
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?	☐ Yes ☐ No ☑ 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?	Yes No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	Yes No 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?	Yes No H1: Please describe finding: NA



Non-compliance:		
Description of non-compliance:	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement		
Recommended corrective action:		
2. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law: ☐ NC against customer code:		
Local law and/or ETI requirement:		
Recommended corrective action:		
Observation:		
Description of observation:	Objective evidence	
Local law or ETI requirement:	observed:	
Comments:		
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	



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

(Click here to return to summary of findings) (Click here to return to Key Information)

FTI

- 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:

- Factory has defined freedom of association policy and procedure in its social compliance manual, as per policy Elegant Fabrics 'respects the just, legal, ethical and social rights, facilities and needs of all employees. Purely on non-discriminatory basis, all employees of the company possess freedom and right to associate and collectively bargain by just, ethical and legal means to protect their rights. On parallel means, all employees are free to elect their representatives for their rights protections.
- Currently there is no worker union however facility has constituted Worker Management Council as a parallel means.
- Factory has constituted a Worker Management Council, comprising of 06 workers and 01 management representatives. Work representatives were elected by the workers through Show of Hand while management representatives are nominated by management. Last election held on 10.07.2020 for a period of two year.
- ➤ The council meets Quarterly basis and discusses the worker's issues and complaints and gives its recommendations to the management for the rectification of the issues. Last meeting of the council was conducted on 12.11.2020. Record of the same was verified during audit.

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

Details:

- > Freedom of Association policy and procedure
- Worker Management Council records
- Worker Management Council meeting minutes
- > Interviews and discussion with workers and council representatives

Any other comments:



A: What form of worker representation/union is there on site?	☐ Union (name) ☑ Worker Committee (Worker Management Council) ☐ Other (specify) ☐ None		
B: Is it a legal requirement to have a union?	⊠ Yes □ No		
C: Is it a legal requirement to have a worker's committee?	⊠ Yes □ No		
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	 Yes No D1: Please give details: ➤ Suggestion / complaint boxes, ➤ Health and safety committee D2: Is there evidence of free elections? Yes No 		
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	Yes No E1: Please give details: There is a Meeting Room available for the Worker Management Council to conduct their meetings		
F: Name of union and union representative, if applicable:	NA	F1: Is there evidence of free elections? Yes No N/A	
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker Management Council	G1: Is there evidence of free elections? Yes No N/A	
H: Are all workers aware of who their representatives are?	⊠ Yes □ No	Factory is providing regular training about Freedom of association and Grievance mechanism protocol.	
I: Were worker representatives freely elected?	⊠ Yes □ No	I1: Date of last election: 10.07.2020 (18- 02-2021)	
J: Do workers know what topics can be raised with their representatives?	⊠ Yes □ No		
K: Were worker representatives/union representatives interviewed?	Yes No If Yes , please state how many: 04 Mr. Nasir Abbas (President) Mr. Shahbaz (Member) Mr. Shakeel (Member) Ms. Sakeena (Member)		
L: Please describe any evidence that union/worker's committee is effective?	Worker Management Council Last meeting of the council was held on 12.11.2020 and Last meeting topics covered health & safety, Worker Complaint, Training of employees, Mutual Cooperation etc.		



Specify date of last meeting; topics covered; how minutes were communicated etc.	Minutes of meeting is distributed among members through hard copy and communicated to workers as well through Notice Board		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No		
If Yes , what percentage by trade Union/worker representation	M1:0% workers covered by Union CBA	M2: _0% workers covered by worker rep CBA	
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☑ No		

Non-compliance:				
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During Document Review it was evident that Factory has not established the election of Worker management Council through ballot box as	Objective evidence observed: (where relevant please add photo numbers)			
required by Law Local law and/or ETI requirement: Section 27 Chapter IV which states the prescribed manner for such election to be in ballot Industrial Relation Act 2012, Chapter IV, the workers representative shall hold office for a period of two years from the date of their election of their election or nomination, as the case may be. Recommended corrective action: Factory shall carry out the Election of WMC as per legal Requirement Follow up audit dated 29-06-2021 Factory has carried out the Election of WMC on 18-02-2021 as per legal Requirement. NC Status: Closed	Document Review			
Local law and/or ETI requirement:				
Recommended corrective action:				
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:				
Local law and/or ETI requirement:				
Recommended corrective action:				



Observation:			
Description of observation:	Objective evidence observed:		
Local law or ETI requirement:			
Comments:			
Good Examples observed:			
Description of Good Example (GE):	Objective evidence observed:		



3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Factory has defined Health and Safety policy and procedure in its social compliance manual as per policy "Company's core priority is to provide employees with neat and clean, safe and healthy environment. Company's facilities include availability of edible items including potable water, separated toilets, tidy and unpolluted air, noise safety, adequate lighting, installation of firefighting, first aid and other emergency equipment and related drills / trainings''.
- Facility has appointed Mr. Azhar Imran (HR & Compliance Officer) to ensure proper implementation, monitoring and training of H&S requirements.
- During site tour, it was confirmed that all factory buildings are made of concrete (bricks, cement work) and seems sound. Production floors are well-ventilated. Temperature was comfortable for workers to work on production floors. Safety signs and safe work instructions have been posted at relevant locations which help identify and warn about the hazards present at the workstation.
- Facility has established Health & Safety committee with 06 members, selected from all departments. Health & Safety committee meets Quarterly and discusses Environment, Health, Safety related issues and provides their recommendation to management for rectification last meeting held on 26.12.2020
- Factory has obtained firefighting equipment inspection certificate from District Civil Defence Faisalabad Doc.Ref. C-22/CDOF/2020/58 dated 01.07.2020 valid up to 30.06.2021 and as per this certificate factory has installed sufficient firefighting equipment in accordance with local law.
- ➤ Health & Safety Risk Assessment of all departments found documented. Last Risk Assessment review on dated 17.06.2020. Risk Assessment related to few processes was not carried out.
- Facility has obtained building stability certificate on "Form K from Arshad Zaman Builders, PEC # 13077, Associate Consulting Architects and in this certificate above firm certified that they have carried out a detailed survey of the building and material which was found satisfactory.
- > The factory has developed form to show the compliance of space allocation to one worker in production halls.
- Facility has obtained electric installation inspection report from Electrical Inspector (Government of Punjab), Electrical Inspectorate according to this report electric installation at Elegant Fabrics were properly protected and secured as per local law, however, detailed electrical inspection report was not found available.



- Facility has obtained labour inspection report from Deputy Director Labour Welfare dated 12.11.2020
- Facility has conducted Quarterly fire / emergency evacuation drill, last drill was conducted on 07.12.2020 Evacuation Time: 01 Mints.)
- Facility has installed 15 fire extinguishers, 06 fire Alarms & 06 Manual call points, 15 Smoke detectors, 03 fire exits 06 Emergency lights, 06 Fire Buckets all firefighting equipment found well maintained.
- > EHS trainings like first aid, firefighting, chemical Handling and Use of PPE's were provided to all employees on quarterly basis.
- ▶ Use of PPE dated: 05.11.2020, Department: Production
- > Training on Fire Fighting and First Aid External Dated: 01.07.2020: Department: All Production Departments, From Rescue 1122
- > Training on Social Compliance Management System Dated: 16.11.2020 Department: All Production Department.
- Accident and injury records were kept, and the factory analysed the accidents/injuries and took corrective actions accordingly.
- > Fire exits were available in production department and evacuation map was found posted.
- There were 02 first Aid boxes with sufficient supplies installed in different departments of the factory and 06 Trained first aiders from Rescue 1122
- > There were total 05 toilets, 04 for male & 01 for female. Toilets were found clean and sufficient.
- Facility has obtained drinking water test report from Laboratory of Global Environmental Lab Reference No: SES/EF/21/001/DW, Dated: 04.01.2021
- > The general EHS conditions such as hygiene, lighting and ventilation etc. were all acceptable

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

Details:

- ➤ Health and safety policy and procedure.
- Certificate of building stability
- Electrical installation inspection report
- Evacuation drill records
- > Firefighting equipment inspection certificate
- ➤ EHS trainings like first aid, firefighting and Use of PPEs records
- > Injury and accident records for the year 2020 verified no any major accident / incident reported.
- > Health and safety inspection reports.
- Machineries and equipment inspection reports.
- > Fire safety list of equipment
- Machine maintenance record.
- > Test reports of drinking water
- Workers hygiene cards and vaccination reports.

Any other comme	n:	เร
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A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	
	through periodic awareness sessions



B: Are the policies included in workers' manuals?	Yes No B1: Please give details: Facility provides handbook to all workers which includes all factory policies
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	Yes No C1: Please give details: No any Structural Changes / Addition observed without permission
D: Are visitors to the site informed on H&S and provided with personal protective equipment	Yes No D1: Please give details: Facility issues visiting card on which Health and safety information mentioned for visitors
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.	 ∑ Yes □ No E1: Please give details: Facility has provided medical facility with trained first aid Staff.
F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?	Yes No F1: Please give details: 04 Trained first aiders available on each floor.
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?	Yes No G1: Please give details: Facility is not providing transport to employees.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	Yes No H1: Please give details: Accommodation is not provided to workers
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?	 ∑ Yes ☐ No I1: Please give details: Factory has conducted the H& S Risk Assessment of all departments
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	Yes No J1: Please give details: H&S risk assessments are conducted to evaluate the arrangements for workers doing overtime e.g. driving after a long shift etc
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	 ∑ Yes ☐ No K1: Please give details: The site has a copy of the banned substances list from its customer and is meeting those requirements



Non-compliance:			
1.Description of non-compliance: NC against ETI NC against Local Law NC against customer code: During site tour, electrical wiring was found unsafe in generator area and office room as it was naked and uncovered. Moreover, Electrical Panel was also fond blocked with Production table in stitching section. Local law and/or ETI requirement 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 Factory shall cover the electrical wiring of said departments. Follow up audit dated 29-06-2021 Factory has covered the electrical wiring of said departments.	Objective evidence observed: (where relevant please add photo numbers) Document Review and site Tour		
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Though Factory has obtained the Electrical Inspection Ref No. EIF/IS/36-ED-17 however detail electrical Inspection Report was not found available as required by Electrical Rules 1937. Local law and/or ETI requirement 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 Factory shall obtain the detailed electrical inspection report from approved authority. Follow up audit dated 29-06-2021 Factory has obtained the detailed electrical inspection report and fitness certificate from approved authority. NC Status: Closed			
3. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: Though Factory has Carried out Risk Assessment, however. Risk level either Qualitative or Quantitative was not found documented against process hazards. Moreover, Risk associated with pregnant women was also not found conducted. Local law and/or ETI requirement 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 Factory shall conduct the risk assessment of Female employees and document the risk level through qualitative or quantitative. Follow up audit dated 29-06-2021	
Factory has conducted the risk assessment of female employees and documented the risk level through qualitative or quantitative. NC Status: Closed	
4. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: During Interview it was evident that, Health and Safety committee members could not demonstrate the knowledge about the protocol which is being adopt by organization during fire emergency Local law and/or ETI requirement 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 Factory shall provide the training about safety protocol to health and safety committee. Follow up audit dated 29-06-2021 Factory has provided the training about safety protocol to health and	
safety committee. NC Status: Closed	
5.Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During Document Review it was evident that factory has not carried out the Medical Test (Hygiene Test) of employees as required by Law Section 23 of The Factories Act, 1934	
Local law and/or ETI requirement Section 23 of The Factories Act, 1934: Each worker in a factory shall be provided with a "Hygiene Card' in which during the month of January and July every year entries shall be recorded after examination by appointed factory doctor to the effect that the worker is not suffering from any contagious or infectious disease. The fee of such an examination shall be fixed by the Provincial Government and will be borne by the occupier or manager of the factory. Recommended corrective action Factory shall conduct the medical test of all employees as per legal	
requirement Follow up audit dated 29-06-2021 Factory has conducted the medical test of all employees as per legal requirement. NC Status: Closed	
6.Description of non-compliance: ☑ NC against ETI ☐ NC against Local Law ☐ NC against customer code:	



During Site Tour, it was evident the Factory store the Diesel Oil in powerhouse without Secondary Containment and MSDS Local law and/or ETI requirement 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 Factory shall place the Secondary Containment and Display the MSDS under Diesel Drum Follow up audit dated 29-06-2021 Factory has placed the secondary containment and display the MSDS under diesel drum. NC Status: Closed			
7.Description of non-compliance: NC against ETI NC against Local Law NC against customer code: During Site Tour, it was noted that Vessels were not provided in Drinking water point and also Drinking water area was found uncleaned Local law and/or ETI requirement Section 20(2) of The Factories Act, 1934: In every factory wherein more than two hundred and fifty workers are ordinarily employed, provision shall be made for cooling the drinking water during the hot weather by effective means and for distribution thereof and arrangements shall also be made for - (a) the daily renewal of water if not laid on; and (b) a sufficient number of cups or other drinking vessels, unless the water is being delivered in an upward jet. Recommended corrective action Factory shall place the Vessels and ensure the Drinking water area neat / cleaned Follow up audit dated 29-06-2021 Factory has placed the vessels and ensured the drinking water area neat / cleaned. NC Status: Closed			
Observation:			
Description of observation:	Objective evidence observed:		
Local law or ETI requirement:	020017041		
Recommended corrective action:			
Good Examples observed:			



Description of Good Example (GE):	Objective Evidence Observed:
	Observed:



4: Child Labour Shall Not Be Used

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Factory has defined child labour policy and procedure.
- Factory has communicated the policy through notices and signs at main gate of the factory.
- ➤ No workers below 18 years are employed in the factory.
- As per hiring procedure prospective workers with authentic age verification documents will be considered.
- ➤ HR department ascertains workers age during appointment through documents and interview, workers age verification documents were kept in their personal files for verification

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

Details:

- Child labour policy and procedure.
- Personal file for age proof documents like CNIC, Birth certificates and educational certificates.
- Facility visit, interview with suspected workers

Any other comments:			

A: Legal age of employment:	15
B: Age of youngest worker found:	20
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☐ No



D: % of under 18's at this site (of total workers)	00 %		
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☑ No E1: If yes, give details		
	Non-compliance:		
code: During Document Review, it was noted the employees out of 10) was not found availa Local law and/or ETI requirement: Companies shall develop or participate in programmes which provide for the transitic performing child labour to enable her or his education until no longer a child. Recommended corrective action: Factory shall place the Age Proof Docume Follow up audit dated 29-06-2021 Factory has placed the age proof documer NC Status: Closed 2. Description of non-compliance:	eal Law NC against customer Re Age Proof Documents i.e. CNIC (02 able.) Read contribute to policies and on of any child found to be m to attend and remain in quality Rent of missing employees	Objective evidence observed: (where relevant please add photo numbers) Document Review	
Observation:			
Description of observation:		Objective evidence	
Local law or ETI requirement:		observed:	
Comments:			
Good Examples observed:			
Description of Good Example (GE):		Objective Evidence Observed:	



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:

- Facility has Compensation & Benefits policy and procedure. As per policy "Elegant Fabrics" provides compensations and benefits to all the employees as per state law. Employees are paid their salary / wages in form of hard cash transferring along with itemized pay stub. Over time hours are compensated at double rate than that of actual pay / wages. Company facilitates all the employees with legal benefits like social security, group insurance, old age benefits, bonus (as per company's annual profit), annual leaves (or encashment) maternity and other leaves.
- > During documents review and workers interview it was noted that factory was paying PKR 17,500 per month and PKR 674 per day as minimum wage to unskilled workers.
- Mr. Azhar Imran (HR & Compliance Officer) is responsible person to act on compliant / objection logged / raised and discuss this matter in Work Council meeting and resolve it on priority basis.
- > Factory was keeping record of the workers wage and wage slips were provided to the workers.
- Factory is paying social security and EOBI of all eligible employees, Contribution payment records reviewed for last three months during audit and found updated. Contribution of few employees were not paying by factory hence raised minor NC.
- Factory is paying Education Cess of the employees. Last was paid for the period from (January 2021, July 2020, March 2020)
- Factory has covered all permanent workers under Group Insurance Scheme from Jubilee Ref: GSER-2021 was reviewed during audit and last premium was made on 2021for 01 Year, Death, Accident, coverage is PKR 500000 to each worker

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

Details:

- > Payroll and payment record of 10 workers for the month of (January 2021, July 2020, March 2020
- Production records for the month of (January 2021, July 2020, March 2020)
- Wage slips of the workers
- > Record of social security and EOBI
- Record of group insurance



 Record of full and final settlement of leaving workers Leave Record of the workers 	
Any other comments:	
Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: During Review of Production Register, it was noted that factory was operational on weekly rest in the month of December 2020 (20th December 2020), but factory has not make payment against working on such day	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement: Section 35 of The Factories Act, 1934: (1) No adult worker shall be allowed or required to work in a factory on a Sunday unless -	Document Review
• (a) he had or will have a holiday for a whole day on one of the three days immediately before or after that Sunday, and • (b) the manager of the factory has, before that Sunday or the substituted day, whichever is earlier - Recommended corrective action: Factory shall make payment against working on weekly rest. Follow up audit dated 29-06-2021 Factory has made payment against working on weekly rest. NC Status: Closed	
2. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: It was noted during document review, that factory was not issuing the salary slips to employees Local law and/or ETI requirement: Rule 19 (3) of The West Pakistan Minimum Wages Rules, 1962: Every employer shall issue to the employees employed in any industry in respect of which minimum rates of wages have been fixed under the provisions of the ordinance, Wage Slips in Form II. Recommended corrective action: Factory shall issue the salary slip of employees as per requirement Follow up audit dated 29-06-2021 Factory has started issuing the salary slip of employees as per requirement. NC Status: Closed	
3. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: During Review of Record, it was noted the Factory was not paying EOBI and PESSI of eligible employees as factory is paying EOBI and PESSI only 20 employees instead of all employees Local law and/or ETI requirement: Employees Old age Benefits Act,1976, Section 3; All employees in an industry or establishment shall be insured in the manner prescribed by this act. Section 9; Contribution shall be payable every month by the employer to the institution in respect of every person in his insurable employment. Recommended corrective action:	



Factory shall pay EOBI and PESSI of all employees	
Follow up audit dated 29-06-2021	
Factory has paid EOBI and PESSI of all employees working currently in the	
facility.	
NC Status: Closed	

Observation:	
Description of observation:	Objective evidence observed:
Local law or ETI requirement:	observed.
Comments:	
Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:

Summary Information

Summary inionnation			
Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hrs / day, 48 hrs / week, 208 hrs / month	A1: 08 hrs / day, 48 hrs / week, 208 hrs / month	A2: ☐ Yes ☑ No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hrs / day, 12 hrs / week, 48 hrs / month	B1: 02 hrs / day, 10 hrs / week, 45 hrs / month	B2: ☐ Yes ☑ No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: PKR 84.25 / hour, PKR 674 / day, PKR 4044 / week, PKR 17,500 / Month for unskilled workers	C1: PKR 84.25 / hour, PKR 674 / day, PKR 4044 / week, PKR 17,500 / Month for unskilled workers	C2: ☐ Yes ☑ No
D: Overtime wage:	Legal minimum: PKR 168.30 / Hr	D1: PKR 168.30 / Hr	D2: ☐ Yes ☑ No



(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)

(Same rate for all OT hours)

OT hours)

Wages analysis: (Click here to return to Key Information)			
A: Were accurate records shown at the first request?	⊠ Yes □ No		
A1: If No , why not?	NA		
B: Sample Size Checked (State number of worker records checked and from which weeks/months - should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 workers wage records for the (January 2021, July 2020, March 2020)		
C: Are there different legal minimum wage grades? If Yes , please specify all.	⊠ Yes □ No	 C1: If Yes, please give details: Unskilled (Sweaper, Helper): PKR 17,500 per month Semi-Skilled B (Asst. Operator,): PKR 18,500 per Month Skilled (Packer), PKR 19,000 per month High Skilled (Supervisor, Quality Checker), PKR 20,500 Per Month As per Punjab Gazette 1st July 2019 	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☐ 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?	☐ Below legal min ☐ Meet ☐ Above	E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2: _100% of workforce earning minimum wage F3:% of workforce earning above minimum wage		
G: Bonus Scheme found:	Bonus Scheme fo	und:	



Please specify details:	Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.			
H: What deductions are required by law e.g. social insurance? Please state all types:	ЕОВІ			
I: Have these deductions been made?	∑ Yes ☐ No			1. EOBI 2. Please describe:
		I2: Please list all deductions that have not been made.		Group Life Insurance PESSI Please describe:
J: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes			
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)	Yes No L1: Please give details:			
M: Is there a defined living wage: 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.	☐ Yes ☐ No M1: Please specify amount/time:			
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other - please give details:			
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to	YesNoN1: Please give details:			

basic needs of workers plus discretionary income). O: Are workers paid in a timely ☐ No manner in line with local law? ∑ Yes □ No P: Is there evidence that equal rates are being paid for equal work: P1: Please give details: □ Cash Q: How are workers paid: Cheque Bank Transfer 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 <u>all</u> 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:

- Facility has defined working hour's policy and procedure. As per policy the management of "Elegant Fabrics" is committed to ensure working hours in compliance to legal requirements. Management ensures that regular working hours don't exceed 48 hrs per week and overtime hours don't exceed 12 hours per week. Management ensures that 7th day weekly rest is ensured. However, in case of "Urgent Business Needs" work can be performed on weekly rest provided all legal compliance is ensured.
 - o Urgent business needs can be considered in following business circumstances:
 - o Strike in the city and loss of production.
 - o Limited to delays / interruptions in production caused by Natural Calamities or unscheduled power failures.
 - o No repetitive production deadlines or unforeseen circumstances which are beyond employer's control".

Date: 29-06-2021



- During audit, it was noted that factory works in below mention shift schedule:
- Factory has one Shift for Production (Stitching, Cutting, Packing, Dispatch) i.e. 09:00 to 18:00
- There were three shifts for security
 - o Shift A: 06:00 To 14:00 hours
 - o Shift B: 14:00 To 22:00 hours
 - o Shift C: 22:00 To 06:00 hours
- > Factory has installed Card Scanner system for recording the workers working hours in the factory. All workers have at least one day off in a week.
- Working hours in the factory is 8 hours per day, 48 hours per week.
- Maximum 2 hours a day and 12 hours' week overtime is allowed in the factory

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

Details:

- > Factory policy and procedure for working hours in the factory
- > 10 workers time record for the month of January 2021, July 2020, March 2020
- Production Records for the month of January 2021, July 2020, March 2020

Any other comments:

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code: There is some inconsistency between Production Record and Time Record was found as it was note during production record that factory was in operational on weekly rest in month of December i.e. 20.12.2020 but Time Record was showing that factory was not in Operational during this date. Local law and/or ETI requirement: 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 Recommended corrective action: Factory shall ensure the consistency record related to Payroll as per requirement Follow up audit dated 29-06-2021 Factory has developed procedure to ensure integrity & consistency of record related to Payroll as per requirement NC Status: Closed	Objective evidence observed: (where relevant please add photo numbers) Document Review
2. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:	
Local law and/or ETI requirement:	

Report reference: 9013888



Recommended corrective	e action:	
	Observation:	
Description of observation	:	Objective evidence
Local law or ETI requireme	ent:	observed:
Comments:		
	Good Examples observed:	
Description of Good Exam	nple (GE):	Objective Evidence Observed:
	Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)	
Systems & Processes		
A. What timekeeping systems are used: time card etc.	Describe: Card Scanner	



B: Is sample size same as in wages section?	Yes No B1: If no, please of	give details			
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of	☐ Yes ⊠ No	D1: If YES, please complete as appropriate:			
contracts/employment agreements used?		☐ 0 hrs	☐ Part time	☐ Variable hrs	Other
		If "Other",	Please define:		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: ☐ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:	F3: Is this allowed by local law? ☐ Yes ☐ No			
	Maximum numb	er of days w	vorked without a	day off (in sample)	:
Standard/Contracted He	ours worked				
G: Were standard working hours over 48 hours per week found?	☐ Yes ☑ No	G1: If yes,	% of workers & fro	equency:	
sis poi Wook louila:		114 15		.,	
	☐ Yes	H1: If yes,	please give deta	IIS:	



H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	⊠ No		
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: January 2021, July 2020, March 2020 02 hours per day, 10 hours per week and 48 hours per month		
	January 2021,: No		
	July 2020: 08 hou March 2020: 00 h	·	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	Yes No		
K: Approximate percentage of total workers on highest overtime hours:	January 2021, No OT Observed July 2020: 02 % hours per month March 2020: 00 hours per Month		
L: Is overtime voluntary?	Yes No Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	Yes No N/A - there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of <u>standard</u> wages:	
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency:	
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	no/low overtime p	pay (May be standard wages above minimum legal wage, with remium) rgaining agreements	



complete the boxes where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other		
	NA		
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	 ✓ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons (please specify) 		
complete the boxes where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:		
	Overtime working is on voluntary basis, worker can deny overtime without any repercussions.		
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☐ No ☐ Q1: If yes, please give details:		
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☑ No		



7: No Discrimination is Practiced

(Click here to return to summary of findings)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Factory has defined non-discrimination policy and procedure and as per policy is not engage in or support discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, or political affiliation.
- > During audit, through workers interview and documents review, no sign of discrimination was observed in the factory.
- During audit, it was confirmed that facility's environment is free from misbehaviour activities, such as gesture, language and physical contact that is sexually coercive, threatening, abusive or exploitative.
- Non-discrimination policy is found posted on employee notification boards at production floors.
- Factory has equal employment opportunity policy.
- Facility has appointed Mr. Azhar Imran (HR & Compliance Officer) for communicating, training, deploying and monitoring and ensuring the implementation of non-discrimination policy and procedure.
- Workers are hired, compensated & promoted based on capability and merit without any distinction, different social and ethnic background workers were found working in the factory

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

Details:

- > The hiring and termination procedure leave application records and employee handbook.
- Payrolls
- > Attendance records
- Termination records
- Training records

Any other comments:

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male:100 % A2: Female %
B: Number of women who are in skilled or technical roles e.g. where specific	00



qualifications are needed i.e. machine engineer / laboratory analyst:		
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?:	Hiring Compensation Access to training Promotion Termination or retirement No evidence of discrimination four C1: Please give details:	nd
Professional Development		
A: What type of training and development are available for workers?	All workers are given Health and safety traini	ngs
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	⊠ Yes □ No	
	If no, please give details:	
	Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Lo code:	cal Law NC against customer	Objective evidence observed: (where relevant please add photo numbers)
Local law and/or ETI requirement:		
Recommended corrective action:		
2. Description of non-compliance: ☐ NC against ETI ☐ NC against Lo code:	cal Law	



Local law and/or ETI requirement:	
Recommended corrective action:	
Observation:	
Description of observation:	Objective evidence observed:
Local law or ETI requirement:	
Comments:	
Good Examples observed:	
Description of Good Example (GE):	Objective Evidence Observed:



8: Regular Employment Is Provided

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

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

Additional Elements: Responsible Recruitment

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

Current Systems and Evidence Examined

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

Current systems:

- > During audit, it was noted that employment in the factory is based on recognised employment relationship established through national labour law & regulations.
- > No casual and seasonal were found hired in the factory during document review, facility visit and workers interview.
- > No labour contractor / agency is in use, all workers are facilities employed.

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

Details:

- ➤ Hiring policy & procedure
- Worker interviews
- Personal file review
- Payroll & time records

Any other comments:



Non-compliance:					
1. Description of non-compliance: NC against ETI NC against Local Law NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)				
Local law and/or ETI requirement:					
Recommended corrective action:					
2. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:					
Local law and/or ETI requirement:					
Recommended corrective action:					
Observation:					
Observation:					
Observation: Description of observation:	Objective evidence observed:				
Description of observation:					
Description of observation: Local law or ETI requirement:					
Description of observation: Local law or ETI requirement: Comments:					
Description of observation: Local law or ETI requirement:					
Description of observation: Local law or ETI requirement: Comments: Good Examples observed:	observed: Objective Evidence				
Description of observation: Local law or ETI requirement: Comments: Good Examples observed: Description of Good Example (GE):	observed: Objective Evidence				



time of recruitment, did they understand them and are they same as current conditions?	Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:			
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ☐ No B1: If yes, please describe details and specific category(ies) of workers affected:			
C: If yes, check all that apply:	Recruitment / hiring fees Service fees Application costs Recommendation fees Placement fees Administrative, overhead or processing fees Skills tests Certifications Medical screenings Passports/ID's Work / resident permits Birth certificates Police clearance fees Any transportation and lodging costs after employment offer Any transport costs between work place and home Any relocation costs after commencement of employment New hire training / orientation fees Medical exam fees Deposit bonds or other deposits Any other non-monetary assets Other - C1: If other, please give details:			
D: If any checked, give details:	NA			
country of which they are not a natio	Migrant Workers: person who is engaged or has been engaged in a remunerated activity in a small or permanent resident or has purposely migrated on a temporary basis to try region to seek and engage in a remunerated activity			
A: Type of work undertaken by migrant workers:	No migrant worker employed			
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

by the facility to the worker?

deductions (such as for remittances) confirmed in writing by the worker and

is evidence of the transaction supplied

C1: Please describe

Yes No

finding:

C2: Observations:



NON-EMPLOYEE WORKERS

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

•	Agency Workers (if applicable) who are not directly paid by the site, but paid by the agency, Usually the and the wages of the individual workers are paid by the agency.)
A: Number of agencies used (average):	A1: Names if available: NA



B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No
	D1: Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No E1: Please give details:
	Contractors: nerally individuals who supply several workers to a site. Usually the contractors ne workers are paid by the contractor. Common terms include, gang bosses, labor provider,
A: Any contractors on site?	Yes No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	Yes No C1: Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per la	w:



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:

> A site tour showed that all factory is purchasing knitted fabric from suppliers. No any sub-contracting process is found

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

If any processes are sub-c	If any processes are sub-contracted - please populate below boxes					
Process Subcontracted	Process 1	Process 2				
Name of factory						
Address						
Process Subcontracted	Process 3	Process 4				
Name of factory						
Address						
Process Subcontracted	Process 5	Process 6				
Name of factory						
Address						
Details:						

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1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)			
Local law and/or ETI /Additional Elements requirement:				
Recommended corrective action:				
2. Description of non-compliance: NC against ETI/Additional Elements NC against customer code:				
Local law and/or ETI requirement:				
Recommended corrective action:				
Observation:				
Description of observation:	Objective evidence			
Local law or ETI/Additional elements requirement:	observed:			
Comments:				
Good Examples observed:				
Description of Good Example (GE):	Objective Evidence Observed:			
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				



B: If sub-contractors are used, is there evidence this has been agreed with the main client?	Yes No B1: If Yes , summarise d	etails:		
C: Number of sub- contractors/agents used:				
D: Is there a site policy on sub- contracting?	Yes No D1: If Yes , summarise details:			
E: What checks are in place to ensure no child labour is being used and work is safe?				
Su	Immary of homeworking ⊠ Not Applicable p		ole	
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No A1: If Yes , summarise o	letails:		
B: Number of homeworkers	B1: Male:	B2: Female	9:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents C1: If through agents:			igh agents, number of
D: Is there a site policy on	Yes			
homeworking?	∐ No			
E: How does the site ensure worker hours and pay meet local laws for homeworkers?				
F: What processes are carried out by homeworkers?				
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No			
	G1: Please give details	s:		
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No			



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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	Yes No A1: Please give details: Complaint and suggestion boxes are mounted at different locations for grievance reporting
B: If Yes , are workers aware of these channels and have access? Please give details.	Purpose of complaint and suggestion boxes is known to all workers.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Complaint and suggestion boxes
D: Which of the following groups is there a grievance mechanism in place for?	
E: Are there any open disputes?	☐ Yes ☐ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☐ Yes ☐ No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	 ☐ Yes ☐ No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	YesNoH1: If no, please give details



I: Does the disciplinary procedure allow	Yes
for deductions from wages (fines) for	No
disciplinary purposes (see wages	
section)?	11: If yes, please give details

Current Systems and Evidence Examined

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

Current systems:

- According to documentation, the factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- As per management interview, document review and workers interview, there was a policy on Harsh Treatment which was communicated to all workers through awareness sessions and display at notice boards.
- > There is an internal process for grievance, which is an anonymous compliant and suggestion box, where workers can report any grievances (harassment, bullying, discrimination etc.); any received complaint will be handled by management, without any reprisal for the worker in question

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

Details:

- > The relevant policy on prevention of harassment and abuse
- > Internal grievance procedure documentation.
- Training records

Any other comments:

Non-compliance:		
Description of non-compliance:	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI requirement:		
Recommended corrective action:		



2. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:		
Local law and/or ETI requirement:		
Recommended corrective action:		
Observation:		
Description of observation:	Objective evidence observed:	
Local law or ETI requirement:	- C200.10 u.	
Comments:		
	•	
Good Examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	



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

(Click here to return to NC-table)

Additional Elements

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

Current Systems and Evidence Examined

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

Current systems:

No migrant worker employed.

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

Details:

- Policy and procedure for employment in the factory
- List of workers
- > Facility visit observed workers working on the floor

Any other comments:

Non-compliance:			
1. Description of non-compliance: NC against ETI/Additional Elements NC against customer code: NC against customer code:	Objective evidence observed: (where relevant please add photo numbers)		
Local law and/or ETI /Additional Elements requirement:			
Recommended corrective action:			
2. Description of non-compliance: NC against ETI/Additional Elements NC against customer code:			



Local law and/or ETI/Additional Elements requirement:		
Recommended corrective action:		
Observation:		
Description of observation:	Objective evidence observed:	
Local law or ETI/Additional Elements requirement:		
Comments:		
Good examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	



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:

- Factory has established environmental policy and procedure in its Environmental manual as per policy **Elegant Fabrics** is committed and endeavouring to do environmentally friendly and pollution curtailing textile business while continually improving its green practices and complying by all national as well as other laws and regulations.
- Factory has obtained Drinking Water Test Report Ref. No. SES/EF//21/001DW, Dated: 04.01.2021, Light Intensity Monitoring Report Ref: SES/EF/21/001/LL, , Dated: 04.01.2021, Noise Monitoring Report Ref: SES/EF/21/001/NL, Dated: 04.01.2021 Verified from SES Laboratory

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

Details:

- > Environmental policy and procedure
- > Facility visit and review of the production process
- > Review of the lab test reports for environmental compliance

Any other comments:

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Description of non-compliance: NC against ETI/Additional Elements	☐ NC against Local Law	Objective evidence observed: (where relevant please add photo numbers)	
Local law and/or ETI/Additional Elements requi	irement:		
Recommended corrective action:			
2. Description of non-compliance: NC against ETI/Additional Elements	☐ NC against Local Law		
Local law and/or ETI/Additional Elements requi	irement:		
Recommended corrective action:			
Observation:			
Description of observation:		Objective evidence observed:	
Local law or ETI/additional elements requirements	e nt :	observed:	
Comments:			
	l		
Good examples observed:			
Description of Good Example (GE):		Objective Evidence Observed:	



Observation:		
Description of observation:	Objective evidence observed:	
Local law or ETI/Additional elements requirements:		
Comments:		
Good examples observed:		
Description of Good Example (GE):	Objective Evidence Observed:	



Photo Form







Main Entrance

Production Building

Fabric Storage







Evacuation Plan

Fire Alarm

Washroom







Stitching

Emergency Exit Door

First Aid Box







Packing

Pressing

Fire Point





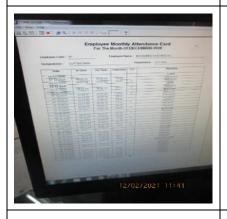




Electric Wire without Cover (Generator)

Production Register with Sunday Working

Electrical Panel Block





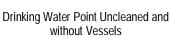


Attendance System No working in December (Inconsistency)

EOBI Slips (NC)

Hygienic Card (NC)







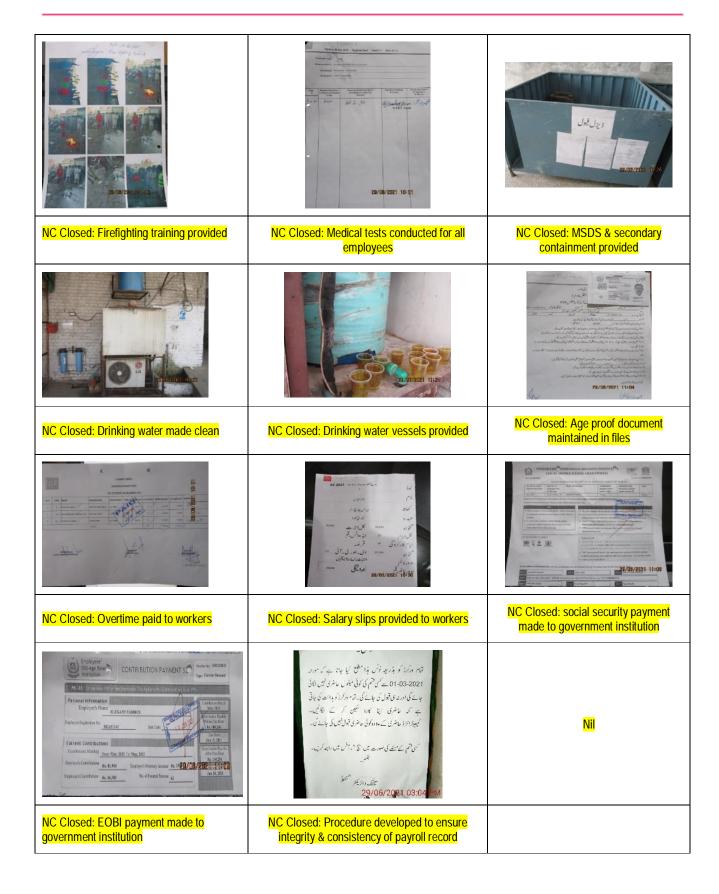
Diesels without MSDS and Secondary Containment Sheet



NC Closed: Training on local laws provided to workers

NC Closed: Grievance training provided to NC Closed: Root cause analysis, NC Closed: Risk Assessment carried out corrective & preventive action recorded workers **and a second control** NC Closed: Removed stacking in front of electrical panel NC Closed: Worker Management Council NC Closed: Naked electrical wiring secured election conducted as per local law 29/06/2021 01:50 PM NC Closed: Pregnant workers covered in NC Closed: Electrical report obtained NC Closed: Electrical fitness certificate obtained risk assessment





Date:29-06-2021





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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:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw_3d_3d

Click here for Supplier (B) members:

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

Click here for Auditors:

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

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