



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC413355997	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS413356784
Business name (Company name):	Dharam Stainless Steel Private Limited		
Site name:	Dharma Stainless Steel Private Limited		
Site address:	Pio Maniyari, Narela Road Kundli Sonipat 131028 IN	Country:	IN
Site contact and job title:	Mr. Sanjeev Kumar / HR Manager		
Site phone:	9990557474	Site e-mail:	hr@fabrinnox.net
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-08-23		

Audit Company Name:
Intertek India

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Vivek Jha	APSCA Number:	21704686
Additional Auditors:	Anant Kumar Verma		21704714
	Alok Mishra		32200498
Date of declaration:	2023-08-23		

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

Site Representation	
Full Name:	Mr. Sanjeev Kumar
Title:	HR Manager
Date of declaration:	2023-08-23
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
During the day of an audit, it was observed that vibrator machines, Physical Vapor Deposition were found non operational.	

Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	3	0	Obs - ZAF600139484 Obs - ZAF600139485 Obs - ZAF600139486
<u>0B - Management systems and code implementation</u>	0.B.3		1	0	0	NC - ZAF600163222
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.3	§1 §2 §3 §4	4	1	0	NC - ZAF600163219 NC - ZAF600163220 NC - ZAF600163221 NC - ZAF600163223 Obs - ZAF600139488
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

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

§2	In accordance with Factories Act. 1948 section 19 (1) In every factory (a) sufficient latrine and urinal accommodation of prescribed type shall be provided conveniently situated and easily accessible to workers at all times while they are at the factory;(b) separate enclosed accommodation shall be provided for male and female employees;(c) such accommodation shall be adequately lighted and ventilated and no latrine or urinal shall, unless specially exempted in writing by the Chief Inspector, communicate with any work room except through an intervening open space or ventilated passages;(d) all such accommodation shall be maintained in a clean and sanitary conditions at all times.(e) Sweepers shall be employed whose primary duty it would be to keep clean latrines, urinals and washing places.
§3	In accordance with Factories Act 1948 Section 7-A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory (2) Without prejudice to the generality of the provisions of sub-section(1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) The arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) The provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.
§4	According to Section 40 of The Factories Act 1948, If it appears to the inspector that any building or part of a building or any part of the ways, machinery or plant in a factory is in such a condition that it is dangerous to human life or safety, he may serve on the occupier or manager or both of the factory an order in writing specifying the measures which in his opinion should be adopted, and requiring them to be carried out before a specified date.

Site Details

Site Details			
Company Name	Dharam Stainless Steel Private Limited		
Site Name	Dharma Stainless Steel Private Limited		
GPS location (if available)	GPS Address:	Pio Maniyari, Narela Road Kundli Sonipat-131028, Haryana, India	
	Coordinates:	28.874095, 77.105557	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License # SPT-ONLINE-CHD-D-16, valid until 31/12/2023 for a maximum capacity of 140 persons /1139 HP.		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The Main products manufacturing at this site are Cutlery items & utensils. Production process: Raw Material (S.S. Sheet) - Cutting- Punching- Policing- PVD process – Checking- Packing- Dispatch.		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The Facility M/S- Dharam Stainless Steel Pvt. Ltd. is a Private limited firm was established in April 2010 at existing location. It is engaged in the Manufacturing of Cutlery items. The plot area of the facility is 60924 Square feet and built up area is approximately 50088 square feet.		
Structure and number of buildings	Building Name:		Building No. 1
	Floor	Description	Remark
	Ground	Power press (Punching section), Tool room, PVD Section, CNC section	None
	First	Polishing, Chemical room, Auto-polishing	None
	Second	Packing, Ware house, Store, Toilets, Drinking Water	None
	Periphery	Security Guard Room, DG set, Transformer, RO Plant, Drinking Water	Facility compound shared with another facility: M/s. Dharam Industries.
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such cracks observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building stability certificate dated 19/12/2013 by competent Civil Engineer Mr. Vaibhav Garg.		

Site function	<input type="checkbox"/> Agent <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Homeworker <input type="checkbox"/> Pack house <input type="checkbox"/> Service Provider	<input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Grower <input type="checkbox"/> Labour Provider <input type="checkbox"/> Primary Producer <input type="checkbox"/> Sub-contractor
Months of peak season	Select a month to Select a month	
Process overview	The Main products manufacturing at this site are Cutlery items & utensils. Production process: Raw Material (S.S. Sheet) - Cutting- Punching- Policing- PVD process – Checking- Packing- Dispatch. Main Machines using in production are Lathe machine, Auto police machine, Drilling machines, Policing machines, cutting machine, molding machines, Air compressors, Diesel generators etc.	
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Please give details:	Grievance committee	
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:	
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:	
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has not provided any accommodation for workers.	

Audit Parameters			
Time in and time out	Day 1		
	In	09:40	
	Out	17:30	
Audit type:	PERIODIC		
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Mr. Sanjeev Kumar / HR Manager		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	Not Applicable		
<i>Reason for absence during the audit</i>	Worker representative was busy in production process.		
<i>Reason for absence at the closing meeting</i>	Not Applicable		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	96	0	0	0	0	0	0	96
Worker numbers – female	12	0	0	0	0	0	0	12
Total	108	0	0	0	0	0	0	108
Number of Workers interviewed – male	23	0	0	0	0	0	0	23
Number of Workers interviewed – female	3	0	0	0	0	0	0	3
Total – interviewed sample size	26	0	0	0	0	0	0	26

Nationalities Structure		
Nationality of Management	Indian	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: INDIAN approx %: 100%	
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No Peak season observed as consistent throughout the year.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	not applicable

Worker Interview Summary	
Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Number of group interviews:	4 group of 5 workers.
Number of individual interviews:	Male: 3 Female: 3
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	Employee did not report any complaints.
What did the workers like the most about working at this site?	Good working environment with no restrictions.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	No negative comments came from the workers.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

Total of 26 employees (Male -23 and Female -03) were selected for interview. All of them spoke freely of their views for the facility. All employees said that they were satisfied with their employment practices and current wages structure. They reported freedom to leave after proper notice period. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they have seen these suggestions used. They are able to complain directly to their supervisors and also felt free to give their general concerns to their grievance representative who would take it to the management.

Attitude of worker's committee/union reps:

There was no union at site. Facility has formed workers committee and grievance committee to resolve workers grievance. During interaction with the workers representatives, it was noted that there was no restriction from the management, and they were allowed to do their works committee related task independently in required manner. There was no discrimination reported at the time of interaction with the workers representatives.

Attitude of managers:

The facility management showed a positive attitude to this audit during the whole process. All documentation requested for review were provided. Locked areas encountered during the audit were unlocked timely. At the end of the audit, all the non-compliance were accepted by the facility. No negative information reported.

0A - Universal Rights covering UNGP
[Summary of Findings]

0A: Compliance Requirements

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

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

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

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

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

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Sanjeev Kumar- HR Manager is responsible for implementing standards concerning Human rights.
- 2) Facility has identified their stakeholders and salient issues.
- 3) Facility has measured direct, in-direct and potential impacts on stack holder's human rights. Hence remedial action in place.
- 4) Facility does have transparent system in place for confidential reporting and dealing with human rights impacts without fear of reprisal towards the reporter.
- 5) No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally.
- 6) No Slavery forced labour and human trafficking observed. All employees are of Indian nationality.
- 7) Employees are free to quit if they are not willing to work.
- 8) The facility has policy on "Human Right" which is duly endorsed by Management and management representative is responsible for implementation.

Evidence examined:

Documented policy on Human rights.
Supplier's social compliance monitoring records.
Interaction with Management and Interview with employees.
Training provided on 10/07/2023.

Any other comments:

None

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

Facility has documented Human right policy which express commitment to respect human rights.

Are the policies included in workers' manuals?

☒ Yes ☐ No

Please give details:

Yes, policies included in workers manuals.

Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Sanjeev Kumar- HR Manager
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had "Data Privacy policy" and ensures all worker, supplier and customer information is confidential.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 8.0% This year 6.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	6.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 6.0% This year 4.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	4.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had maintained Form–26 & 26A, however no accidents have occurred till date.

Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

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0B - Management Systems and code Implementation
[Summary of Findings]

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Sanjeev Kumar- HR Manager is responsible to ensure compliance with these code requirements.
- 2) Based from interaction with the factory management, it was understood that factory management has developed management system for implementing & maintaining social compliance code.
- 3) Facility managers are well aware of the compliance requirements and have adequate knowledge on the legal requirements.
- 4) Facility has obtained Factory License including approved building layout plan and stability certificate.
- 5) Facility has obtained all the required documents for the facility building.
- 6) Employees were found aware about the Ethical Trade Initiative (ETI) base code requirements.
- 7) Facility has communicated ETI base code requirement to their suppliers.
- 8) Facility has conducted risk assessment and internal audit to monitor effectiveness of social management system implemented at audited site.
- 9) Facility has system in place to conduct legal due diligence to recognize and apply National laws and practices relating to land title.
- 10) Facility was found to have appropriate land rights.
- 11) ETI code found displayed in local language in facility and also communicated to all employees. However some deviations were noted.

Evidence examined:

Facility Policy and Procedures on Management system & code implementation.
All statutory licenses including Factory License and building plan approvals.
Factory license of facility is valid till 31/12/2023.
Building Stability certificate dated 19/12/2013.
Approved Building layout plan of facility date 11/03/2014.
Risk assessment conducted on 01/06/2023.
ETI base code training done on 10/07/2023.
Internal Audit was conducted on 04/07/2023.
Interaction with Management and Interview with employees.

Any other comments:

None.

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes ☒ No

Please give details:

The site has not been subjected to any fines/prosecutions for noncompliance to any regulations for the last 12 Months.

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has developed policies and procedures on force labour, child labour, no discrimination, harassment & abuse. And these policies are displayed at notice board in local language (Hindi) and communicated to all employees.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Facility has regular meetings with workers.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: ETI code training provided to all the employees. However some deviation noted.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has maintained training records of all employees including ETI code training, however some deviation were noted.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: not applicable
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Mr. Sanjeev Kumar- HR Manager
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Sanjeev Kumar- HR Manager
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has "Data Privacy policy" to ensure all worker information is confidential.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had a system to ensure the same whether the information was shared on a need to know basis only.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has conducted risk assessment to evaluate policy and procedure effectiveness.

Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on the interaction with the management and review of record that effective action has been taken for the risk identified during internal audit.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has policy which requires labour standards of suppliers.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had obtained "Business License" and "Approved Plant Layout" from the concerned authority which is found valid dated 11/03/2014.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have systems in place to conduct legal due diligence to recognize and apply National laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have written policy and procedures specific to land rights which meets National law requirement.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility is located in an industrial area set up by the government of Haryana state government.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility is located in an industrial area set up by the government of Haryana state government.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: not applicable

Non-Compliance		Evidence																												
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1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Sanjeev Kumar- HR Manager is responsible to oversee that no forced, bonded, involuntary or prison labor is employed.
- 2) There was no presence of forced / bonded or prison labor at the workplace.
- 3) Employees are not required to lodge any deposits, identity papers with the facility before or after joining the services.
- 4) All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period of 01 month.
- 5) Employees are free to leave at the end of their shift and there is no compulsion to work overtime.

Evidence examined:

Facility Policy and Procedures for No Forced Labour.
Personal files with application form and bio data including employment contract.
Interaction with Management and Interview with employees.
Resignation records.

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Workers may resign and leave after serving a month notice period as agreed under terms of employment.
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: Facility does not have any part of business with UK.

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Employees are free to leave facility any time.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Facility has maintained policy against forced/trafficking/bounded labour. Same is forwarded to supply chain. Facility also ensuring that there is no modern slavery.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has maintained policy against forced/trafficking/bounded labour. Same is forwarded to supply chain. Facility also ensuring that there is no modern slavery in their business or supply chains with regular visits and training.

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

[Summary of Findings]

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Sanjeev Kumar- HR Manager is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management.
- 2) Factory recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3) Facility encourages and respects all employees' rights to join union freely.
- 4) At present, there was no union / trade union in the facility.
- 5) Facility has formed Grievance committee to resolve workers grievances.
- 6) Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.
- 7) There was no evidence of suppression of employees' rights.

Evidence examined:

Facility Policy and Procedures for Freedom of Association and Right to Collective Bargaining.
Interaction with Management and Interview with employees.
Latest Works committee meeting conducted on 08/07/2023.
Workers election conducted on 08/01/2022.
Latest Grievance committee meeting conducted on 06/07/2023.

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Grievance committee	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has formed grievance committee and ICC committee to resolve workers issues and grievances. Further, suggestion box is provided for confidential reporting of grievances.	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the employees are free to join any union from facility management. Management also provides training to employees regarding the same on periodic basis.
Name of union and union representative, if applicable:	not applicable
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committee & Grievance committee
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on interaction with employees, all of them are aware of their workers representative, the same was displayed on the noticed board also.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-01-08
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Works & Grievance committee meeting minute's records, Last meeting conducted on 08/07/2023 & 06/07/2023 respectively. Minutes of meeting were evidenced. Based on the audit process and review of records, it was noted that workers committee was effective. As per employee's interview and interaction with workers representatives it was noted that issue reported during committee meeting was taken seriously and effective actions are taken to resolve the issue.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

3: Compliance Requirements

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

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

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

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

Current Systems:

1. General Health and Safety management:

- Mr. Sanjeev Kumar- HR Manager is responsible for Health & Safety aspects for the site.
- Potable water was freely available in all areas and test certificates were up to date.
- Sufficient clean toilets were available at all times to workers, However some deviation were noted.
- Ventilation, temperature, and lighting were adequate for the production processes.
- Health & safety committee meeting conducted on quarterly basis.

2. Fire Safety:

- There were at least 2 exits from each work area and these were clearly marked.
- Firefighting equipment such as 01 Fire Hooter, 95 Fire extinguishers, 06 Fire alarms call points, 06 Hydrant, 06 Hose reel and 25 Emergency lights provided in the facility.
- Evacuation diagrams were posted in all areas and understood by all workers interviewed
- Fire drills were organized and recorded. Last drill conducted on 17/07/2023.
- Facility has marked all the exits and emergency exits in a language understood by majority of the employees.
- Facility has marked aisles on production floors.
- Fire safety training conducted on 17/07/2023 and 06 employees found trained on Fire safety through M/s. Sita Fire service.

3. Machine & Electrical safety:

- All machine and electrical equipment were maintained in good condition.
- Facility having competent electrician with ITI certificate.
- Safety sign was posted near machines/equipment's for employee's reference.
- Facility has provided adequate safety guard on all required plant and machines.

4. Chemical safety:

- PPE's and chemical handling training was provided to the employees.
- Secondary containment not provided for chemicals in chemical store.

5. Medical services:

- Facility has provided well equipped total 05 First aid boxes.
- Facility had trained their 04 employees from St. Johns Ambulance on dated 30/11/2018.
- Facility has conducted routine medical examination for the workers as per process requirement.

Evidence examined:


- Health and Safety Policy.
- Fire NOC certificate No. FS/2022/954 dated 21/07/2022 found valid for 3 years. However some deviation were noted.
- Industrial accident records – Updated and no accident occurred in last one year.
- First aid training was provided to 04 employees through St. Johns Ambulance Associations on 30/11/2018.
- Drinking Water Test conducted on 12/06/2023.
- Fire Drill conducted once after every two months. Last drill was conducted on 17/07/2023.
- Firefighting equipment inspection conducted on monthly basis.
- Fire training was provided to employees on 17/07/2023 by M/s. Sita Fire Services.
- Personal Protective Equipment (PPE's) training and chemical handling training provided to all employees on 03/08/2023 & 04/08/2023 respectively.
- Health & Safety committee meeting conducted on quarterly basis; latest meeting conducted on 03/07/2023.
- Air quality & Noise level monitoring test done on 12/06/2023.
- Building stability certificate found dated 19/12/2013 & Building plan approval letter dated 11/03/2014.
- Accident register found updated till July 2023.
- Facility having four DG sets (500KVA & 250KVA) Inspection done on date 15/12/2022.
- Air Compressors testing inspection done on 01/07/2023.
- Medical examination & audiometry test has been conducted on 07/05/2023 for the workers working in hazardous process.
- Interview with Health & Safety, workers committee members.
- Interaction with Management and Interview with employees.

Any other comments:



None


Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose, and these are communicated to workers during induction training.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility had included the social compliance policies in worker's manual.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility having approved building plan layout dated 11/03/2014.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Visitors to the site informed on H&S and provide with personal protective equipment.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable and not required by law.

Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: First aid training was provided to 04 employees from St. Johns Ambulance dated 30/11/2018.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as facility does not provide transport to employees. Further, it is not a legal requirement.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as facility does not provide living space (dormitory) to employees.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has conducted H&S risk assessment which includes evaluating the arrangements for workers doing overtime e.g. driving after a long shift.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility is meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on interaction with facility management the facility does not use any banned chemicals and meet all the environmental standards based on customer requirement.

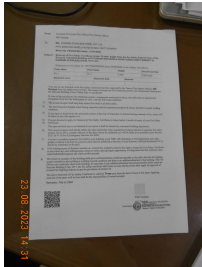
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<table><tr><th colspan="2">Observation</th></tr><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600139488</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>203 - Fire exits are inadequate by design/construction, location, etc.</td></tr><tr><td>Subcategory</td><td>Fire Safety - Fire exits</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA419590365</td></tr><tr><td>Resolved by audit</td><td>ZAA600022015</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td>N/A</td></tr><tr><td>Explanation to the observation</td><td>Based on facility Tour on the day of Audit it was noted that facility has installed 05 Rolling shutters in the facility as Emergency exit. Further facility has provided safety locking mechanism in each rolling shutter installed in the factory.</td></tr><tr><td>Actions</td><td>N/A</td></tr><tr><td>Additional comments</td><td>Rolling Shutters locking mechanism reviewed for all shutters. Rolling shutters mechanism verified, it will not hanged and locked, always open with latch mechanism.</td></tr></table>			Observation		Status	CLOSED	Reference	ZAF600139488	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	203 - Fire exits are inadequate by design/construction, location, etc.	Subcategory	Fire Safety - Fire exits	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA419590365	Resolved by audit	ZAA600022015	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	Root cause - Other	N/A	Explanation to the observation	Based on facility Tour on the day of Audit it was noted that facility has installed 05 Rolling shutters in the facility as Emergency exit. Further facility has provided safety locking mechanism in each rolling shutter installed in the factory.	Actions	N/A	Additional comments	Rolling Shutters locking mechanism reviewed for all shutters. Rolling shutters mechanism verified, it will not hanged and locked, always open with latch mechanism.
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4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

- No Child Labor and Child Labor Remediation Policy.
- Age Proof records of 26 out of 26 selected samples.
- Interaction with Management and Interview with employees.

Any other comments:

None

Legal age of employment:	14
Age of youngest worker found:	22
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: not applicable

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based on review of wage records, the facility has paid the applicable minimum wages to all the employees.
2. Based on employee's interview, wages are fixed on daily rated, calculated and paid on monthly basis on or before 7th of respective month.
3. Based on employee's interview, wage slips are provided to all the employees and employees are aware of their wage calculations.
4. Based on wage record review, all employees are covered under social security benefit of Employees provident fund, Employees state insurance.
5. Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.
6. Based on employee's interview and record review all the employees are received appointment letter with written and understandable information about their employment conditions in respect to wages.
7. Through document review and facility tour, no inconsistency was found between production records and provided attendance records.
8. As per the review of records, No overtime found recorded in selected sampled months. However, facility having Overtime policy as per 200% rate. Overtime done on voluntary basis.
9. The employees are paid the bonus at the rate of 8.33% of applicable minimum wages amount as per the legal requirement.
10. Leaves were provided to all eligible employees and leave records found maintained.

Evidence examined:

- Documents review.
- Employee interview.
- Local and national laws.
- Wages and benefits policy.
- Local legal minimum wage documents.
- Time records & Payroll records from 1st August 2022 to 30 July 2023 were reviewed.
- Leave with wage records (Form No: 15) and Leave encashment records.
- Social insurance and payment receipts from the local labor department.
- The employees are paid bonus at the rate of 8.33% of applicable minimum wages amount as per the legal requirement.
- Resignation record.
- Full and final Settlement paid records.
- List of National and Festival Holidays (Form 1A).
- Interaction with management and Employees.

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: null	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 405.11 Per Week: null Per Month: 10532.84	Actual Per Day: 405.11 Per Week: 0.0 Per Month: 10533.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 sampled employees from July 2023 (Recent Month). 26 sampled employees from January 2023 (Random Month). 26 sampled employees from October 2022 (Random Month).		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The legal minimum wages applicable in the state of Haryana state government as applicable to this facility are as under: Unskilled INR 10532.84/- per month; Semi-Skilled (A) INR 11059.44/- per month; Semi-Skilled (B) INR 11612.40/- per month; Skilled INR 12193.03/- per month. Skilled INR 11857.83/- per month;		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Minimum wages paid by the facility are, for Unskilled– INR 10533.00 per month.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: The employees are paid the bonus at the rate of 8.33% of applicable minimum wages amount as per the legal requirement. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		

What deductions are required by law e.g. social insurance? Please state all types:	Employees Provident Fund, Employee State Insurance & Labour Welfare fund. PF at the rate of 12% of basic earn wage and ESI at the rate of 0.75% of gross wage, LWF at the rate of 0.20% of wage.
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Provident Fund at the rate of 12% of basic earn wage and Employee state Insurance at the rate of 0.75% of gross wage.
Please list all deductions that have not been made.	not applicable
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on audit process, it was noted that all required meeting/training are conducted during working hours for which employees are paid. Employees do not attend any meeting/training for which they will not be paid.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The local government revises the minimum wage once in every six months which the facilities have to comply.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: From the review of available records, it was noted that equal pay is given for same nature of work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

6 - Working Hours are not Excessive [Summary of Findings]

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Mr. Sanjeev Kumar- HR Manager is responsible for ensuring compliance with regular and overtime hours as per law.
2. Facility has implemented biometric attendance recording system to record IN/OUT time of all employees.
3. Facility works in single shift from 08.30am to 05.30pm and Lunch Break from 01.00pm to 02.00pm.
4. "IN/OUT" time record was maintained for all 26 of 26 randomly selected employees.
5. During audit process and review of records it was noted that overtime found within limit as per legal.
6. Facility has no compulsion on overtime work. It is purely voluntary. Facility having policy for overtime as per 200% rate. No overtime recorded in selected sample months.

Based on review of time records, the working hours could be summarized as follows:

- For July 2023 (recent month), the maximum working hours per week was 54 hours (48 hours regular + 00 hours overtime).
- For January 2023 (random month) the maximum working hours per week was 50 hours (47 hours regular + 00 hours overtime).
- For October 2022 (random month) the maximum working hours per week was 50 hours (48 hours regular + 00 hours overtime).

Evidence examined:

Facility Policy on working hours.

In/Out time records for 26 selected samples for 03 months i.e., July 2023 – most recent paid month, January 2023 – random month and October 2022 – random month.

Production records (from work floors to check for discrepancies).

Any other comments:

None

Working hours' analysis

Systems & Processes

What timekeeping systems are used?

Facility has implemented biometric attendance recording system to record IN/OUT time of all employees.

Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days	<input type="checkbox"/> 2 in 14 days	<input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Maximum number of days worked without a day off (in sample):	6		
Standard/Contracted Hours worked			
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:		
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Overtime Hours worked			
Actual overtime hours worked in sample (State per day/week/month)	0 hours per day / 0 hours per week / 0 hours per month.		
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: 48 hours per week (48 standard + 0 overtime).		
Approximate percentage of total workers on highest overtime hours:	0.0%		
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: As per policy, overtime will be performed voluntarily. No overtime recorded in selected sample months.		
Overtime premium			

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: As per policy overtime will be paid at the rate of 200% of regular wage rate. No overtime recorded in selected sample months.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No As per policy overtime will be paid at the rate of 200% of regular wage rate. No overtime recorded in selected sample months.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	not applicable
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	not applicable
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	not applicable
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

- Facility Policy on No Discrimination.
- The hiring and termination procedure, leave application records and employee handbook.
- Time in and out records, full and final settlement records and training records.
- Appointment letter with terms and conditions for 26 out of 26 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees.

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 90.0%		Female: 10.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	not applicable		
Professional Development			
What type of training and development are available for workers?	Facility had a system of professional development of their employees & staff based on character, attendance, any disciplinary action, involvement in training program etc.		

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)

☒ Yes ☐ No

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Sanjeev Kumar- HR Manager is responsible to ensure compliance with these code requirements.
- 2) Employment contracts (appointment letters) were available and maintained for 26 of 26 selected employees. Terms and conditions of employment were clearly defined in appointment letter issued to the employees.
- 3) Facility does not follow and believe in the fixed term employment.
- 4) Facility understands recruitment process.
- 5) Facility does not employ any contract workers.
- 5) Facility does not employ any migrant workers.
- 6) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment.
- 7) Photo identification card is issued to all the employees.

Evidence examined:

- Facility Policy on Regular employment.
- Appointment letter with terms and conditions for 26 out 26 selected samples.
- Salary and other benefit records.
- Interaction with management and Employees.

Any other comments:

None.

Responsible Recruitment

All Workers

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

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

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- ☐ Yes ☒ No

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

8A - Sub-Contracting and Homeworking
[Summary of Findings]**8A: Compliance Requirements**

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

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

Current Systems and Evidence Examined

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

Current Systems:

At present, no Sub-contractor and Homeworkers are used by the facility.

Evidence examined:

Facility policy on Sub-Contracting & Homeworking.
Inward and outward material register.
Production records.
Interaction with management.

Any other comments:

None

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site?

☐ Yes ☒ No**Summary of homeworking – if applicable**

Is homeworking used at this site?

☐ Yes ☒ No

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

None

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

10A - Entitlement to Work and Immigration
[Summary of Findings]

10A: Compliance Requirements

10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

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

Current Systems:

- 1) Mr. Sanjeev Kumar- HR Manager is responsible to ensure compliance with this code.
- 2) Facility has not employed any foreign employees.
- 3) Facility has not employed any agency labour.
- 4) Facility has not employed any contractors labour.
- 5) Facility has maintained personnel files for all sampled 26 employees with photocopies of documentation showing that they have local citizenship and do not need any special permission to work in India.

Evidence examined:

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

Any other comments:

None

10B4 - Environment 4-Pillar [Summary of Findings]

10B4: Compliance Requirements

- 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
- 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
- 10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements
- 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
- 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).
- 10.B4.7 Businesses shall make continuous improvements in their environmental performance.
- 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
- 10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.
- 10B4: Guidance for Observations
- 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
- 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined

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

Current Systems:

1. Mr. Sanjeev Kumar is responsible for all environmental issues.
2. Based on management interaction, facility and their suppliers are aware the environmental requirements.
3. Facility has obtained a valid consent to operate under Air and Water from the pollution control board.
4. Facility is aware of end client's environmental standards/code requirements.
5. Facility has documented environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
6. Facility conducted environment impact assessment and aware of the significant environmental impact of their site and its processes.
7. Facility is measuring use of natural resource like water, diesel and have target to reduce.
8. Facility is working continuously to reduce use of natural resources to improve in their environmental performance.
9. Facility have environment Policy & Environment certification.
10. Facility has completed the appropriate section of the SAQ and made it available to the auditor.
11. During review of records and interaction with management, it was noted that facility is not subjected to any fines/prosecutions for noncompliance to environmental regulations.

Evidence examined:

Facility Environment Policy.
SAQ completed by the facility.
Facility having Air & Water consent from Pollution control board which found valid from 25/07/2016 to 31/03/2026.
Facility having contract agreement for waste dispose with M/s. Bharat Oil & waste management system dated 01/02/2021 valid for 5 years.
Stack Monitoring test, Noise assessment test and ambient Air quality test report obtained on 12/06/2023.
Records of water, diesel, electricity consumption. Improvement plan of source reduction.
Latest Waste disposal done on 13/06/2023.
Evidence of Environment policy communication to the suppliers.
Interaction with management and Employees.

Any other comments:

None

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Mr. Sanjeev Kumar- HR Manager
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has conducted risk assessment on covering environmental impact of the site. All related records had been provided for review.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no such certification in the facility.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy highlights the key impacts on the environment and to comply with the legal requirements.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: not applicable.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility having valid Air & Water consent from Pollution control Board.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Facility has documented process to record & maintained for chemicals used in process. However facility not used any hazardous chemicals.

Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility have a system for managing local government requirement and also ensure the requirements are being fulfilled.	
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Targets were found set 5% for reduce consumption for current year, and same confirmed by the management.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: not applicable	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has electric meter and water meter to record consumption of utilities.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No Sub-contractor agencies or business partners were involved in the facility.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	2322492	23241
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Ground water	Ground water
Water Volume Used	1286	779
Water Discharged	Domestic	Domestic
Water Volume Discharged	0	0
Water Volume Recycled	0	0
Total waste produced	63.8MT	42.2MT
Total hazardous waste produced	95 Kg	69 Kg
Waste to recycling	31.2MT	21MT
Waste to landfill	0	0
Waste to other	31MT	21MT

Total Product Produced	220MT	169MT
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10C - Business Ethics – 4-Pillar Audit [Summary of Findings]

10C: Compliance Requirements

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

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

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

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

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

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

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

10C: Guidance for Observations

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

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

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined

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

Current Systems:

1. The facility has a Anti Bribery policy in place for controlling and reporting any corrupt or unethical practices. Facility conducted their busies activities without bribery, corruption, or any type of fraudulent Business Practice.
2. The facility follows requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
3. Based on audit process and review of records, it was noted that the comply with all fiscal legislative requirements.
4. It was noted that facility has a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
5. It was noted that the facility has business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice.
6. Mr. Sanjeev Kumar- HR Manager is designated person responsible for implementing standards concerning Business Ethics.
7. It was noted that the facility has provided business ethics training to the employees according to their role and responsibility and related job functions.
8. The facility has an Ethic policy in place which ensure that Business is conducted in an Ethical manner.
9. Based on audit process and review of records, it was noted that the facility has not been recently subject to any fines/prosecutions for non-compliance to Business Ethics regulations. Hence there is no sustainable corrective actions implementation required.

Evidence examined:

1. Facility has developed policies on business ethics covering anti-corruption and anti-bribery including gift and gratuity and same is displayed in local language.
2. Facility has provided training to their staff including those in sales, purchasing and logistics on business ethics policy and procedure and reporting mechanism.
3. Confidential reporting policy and procedure.

Any other comments:

None

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers Please give details: Policy available and communicated to all relevant parties.
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training provided to respective employees dated 05/08/2023.
Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Policy updated on regular basis.
Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Supplier required third parties to complete their own business ethics training.

Attachments



Fire Aarm.JPG



Attendance Punching (2).JPG



Name Display.JPG



Working Emergency Lights.JPG



Emergency Exit.JPG



CNC Machines (2).JPG



First Aid Box (2).JPG



Fire Alarm Panel.JPG



Oven.JPG



Aisles (3).JPG



Drinking water.JPG



Aisles.JPG



Policies Display.JPG



Main Gate.JPG



Dust Collector.JPG



Compressor (2).JPG



Rubber Mat.JPG



Dye Storage.JPG



Plant Layout.JPG



Wash Rooms dirty.JPG



Emergency Display.JPG



Fire Buckets (2).JPG



Grinding.JPG



CNC Machines.JPG



Rectifier.JPG



Suggestion Box.JPG



Fire buckets.JPG



PPE Usage.JPG



Abstracts.JPG



Vibrator.JPG



PPE Usage (4).JPG



Attendance Punching.JPG



Aisles (2).JPG



Toilet Female.JPG



Stack Height.JPG



Emergency Lights.JPG



PPE Usage (3).JPG



FA Box.JPG



Compressor.JPG



CNC Machine.JPG



First Aid Box.JPG



Fire extinguishers.JPG



Production (2).JPG



Fire fighting.JPG



Material Lift.JPG



Production (3).JPG



Policy Display.JPG



Eye shower not working.JPG



PPE Usage (5).JPG



Coolant.JPG



PPE Usage (2).JPG



DG Set.JPG



Hydrant.JPG



Policies.JPG



Cleaning.JPG



Abstracts (2).JPG



Male Toilet.JPG



Hand Wash.JPG



Abstracts (3).JPG



Raw material Storage.JPG



Manual Sorting.JPG



Evacuation Plan.JPG



Production.JPG



Signed CAPR.pdf



First Aid Box.JPG



WorkShop.JPG



No Seondry Containment.JPG



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