

Sedex Members Ethical Trade Audit Report



| Version 6.1 | |
|-------------|--|
| | |

| Audit Details | | | | | | | | | | |
|--|---------------------------------|-----------------------------|----------------------------|---------|---|--------------|------|-------------|----------------------------|--|
| Sedex Company Reference: (only available on Sede | ex System) | ZC41967 | 76968 | | Sedex Site Re (only available of | | | ZS420389992 | | |
| Business name (Company name) | : | STITCHN | STITCHMAN INC | | | | | | | |
| Site name: | | STITCHN | ЛAN INC | | | | | | | |
| Site address: | | OPP. BH DHANAI KHOKHA | BHAGAT NADAL KHARA MADABAD | | | IN | | | | |
| Site contact and j | ob title: | Mr Mihii | r Shah / Ger | neral M | lanager | | | | | |
| Site phone: | | 9925160 |)110 | | Site e-mail: | Site e-mail: | | | shahnissin11@gmail.co m | |
| SMETA Audit Pilla | rs: | | oour ndards | | Health and Safety (plus Environment 2-Pillar) | | ment | ✓ | Business Ethics | |
| Date of Audit: | | 2024-07 | -11 | | | • | | | | |
| | | | | | | | | | | |
| | | | Aud | it Com | pany Name: | | | | | |
| | | | D | QS CF | S GmbH | | | | | |
| | | | | | | | | | | |
| Audit Conducted By | | | | | | | | | | |
| Affiliate Audit Company | > | | Purchaser | | Retailer | | | | | |
| Brand owner | | | NGO | | ☐ Trade Un | | nion | | | |
| Multi- stakeholder | Ider Combined Audit (select all | | | | that ap | ply) | | | | |

2024-07-11

2024-07-11

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: | Vibha Pandey | APSCA Number: | 21704842 | | | |
| Additional Auditors: | Divyanshi Bansal | | 32400038 | | | |
| Date of declaration: | 2024-07-11 | | | | | |

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 Mihir Shah | | | |
| Title: | General Manager | | | |
| Date of declaration: | 2024-07-11 | | | |

Comments:

Any exceptions to this must be recorded here (e.g. different sample size):
Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just

started last Sep 2020).
The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives

None

Audit company: DQS CFS GmbH

Report reference: ZAA600075940

Start Date:

2024-07-11

End Date: 2024-07-11

Summary of Findings

| Issue | | a of nformity | | | Findings | |
|---|------------|------------------|----|-----|----------|--|
| (please click on the issue title to go direct to the appropriate audit results by clause) | ETI | Local Law | NC | Obs | GE | |
| 0A - Universal rights covering UNGP | | | 0 | 1 | 0 | Obs - ZAF600542176 |
| 0B - Management Systems and code implementation | 0.B.3 | | 1 | 0 | 0 | NC - ZAF600558628 |
| 1 - Freely chosen employment | | | 0 | 0 | 0 | |
| 2 - Freedom of association and right to collective bargaining are respected | | | 0 | 0 | 0 | |
| 3 - Working conditions are safe and hygienic | 3.1 3.1 | §1 | 2 | 0 | 0 | NC - ZAF600558629 NC - ZAF600558630 |
| 4 - Child labour shall not be used | | | 0 | 0 | 0 | |
| 5 - Living wages are paid | | | 0 | 0 | 0 | |
| 6 - Working hours are not excessive | | | 0 | 0 | 0 | |
| 7 - No discrimination is practiced | | | 0 | 0 | 0 | |
| 8 - Regular employment is provided | | | 0 | 0 | 0 | |
| 8A - Subcontracting and homeworking | | | 0 | 0 | 0 | |
| 9 - No harsh or inhumane treatment is allowed | 9.2 | | 1 | 0 | 0 | NC - ZAF600558631 |
| 10A - Entitlement to work and immigration | | | 0 | 0 | 0 | |
| 10B2 - Environment 2-pillar | | | 0 | 1 | 0 | Obs - ZAF600542175 |
| 10B4 - Environment 4-pillar | | | 0 | 0 | 0 | |
| 10C - Business ethics 4-pillar | | | 0 | 0 | 0 | |

Local Law Issues

| Issue | Description |
|-------|---|
| §1 | As per Rules prescribed under Sec. 38 and 41of Factories Act, 1948: Gujarat Factories Rules, 1963/Rule 66-A(9)(e);, The exits shall be clearly visible and suitable illuminated with suitable arrangements, whatsoever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply. |

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Site Details

| | Site Details | | | | | |
|--|---|---|---|--------|--|--|
| Company Name | STITCHMAN INC | | | | | |
| Site Name | STITCHMAN INC | | | | | |
| GPS location (if available) | GPS Address: B-9 ,MAHAVIR ESTATE ,OPP.BHAGAT DHANADAL KHOKHARA ,AHMEDABAD - 380008 , GUJARAT | | | | | |
| | Coordinates: Latitude: 22.994459 Longitude: 72.617287 | | | | | |
| Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Factory License seen vide 20045 dated 1.9.2024 for 100 employees 100 HP valid till 31.12.2025, Fire NOC seen vide F.B. Number 152 dated 5/11/2023 valid for one year. The standing order is approved by Labor inspector dated 2.1.2023. Subsequently the fire NOC is not required as per Govt notification number GH/V/9 of 2021/AGN-120221-100-L1 by Urban Development and Urban Housing Department dated 22.1.2021. The building plan approval dated 2/1/2023. The pollution NOC seen vide notification number P/328/17309 dated 12.4.2016 that the factory is in white category, | | | | | |
| Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc | Manufacturing of Canvas Bags | | | | | |
| Site description: (Include size, location, and age of site. Also, include structure and number of buildings) | The organization was started in the year 2004 and the facility is operating from the current location since 2004. The total area is 1051 Sq mtrs Built Area – 1135.34 Sq mt. The nearest airport is around 15 km. It is operating from double storied building. The capacity of the plant - 2 lac pieces per month. The shift timings are 900 to 1730 hours lunch break 1230 to 1300 hours. Weekly off Sunday. The total number of employees is 99 out of which 28 male and 71 female. The age of youngest worker is 22 years. | | | | | |
| Structure and number of buildings | Building Name: | | 1 | | | |
| | Floor | Description | | Remark | | |
| | Ground Floor | Floor Cutting, Stores, CAD, Sampling, Embroide ry | | | | |
| | Mezzanine Floor | Office ,Showroom, NA pantry | | | | |
| | 2nd Floor Stitching , Finishing, Pressing, Checking packing | | | | | |
| Visible structural integrity issues (large cracks) observed? | ☐ Yes ☑ No | | | | | |
| Clacks) Observed: | Please give details: | | | | | |
| | There are no cracks | | | | | |

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| Does the site have a structural engineer evaluation? | ☑ Yes □ No | | | | |
|---|--|---|--|--|--|
| evaluation? | Please give details: | | | | |
| | Seen the building stability certificate dated 5/6/2023 by Er. Utsav Rajesh Kumar Majumdar. | | | | |
| Site function | □ Agent | Factory Processing/Manufacturer | | | |
| | ☐ Finished Product Supplier | □ Grower | | | |
| | ☐ Homeworker | ☐ Labour Provider | | | |
| | □ Pack house | □ Primary Producer | | | |
| | ☐ Service Provider | ☐ Sub-contractor | | | |
| Months of peak season | | | | | |
| Process overview | Cutting - Printing(o/S) -embroidery(O/s) -Stitching- Finishing- Packing-Dispatch The machines are Hand cutter machine – 2 Single Stitching machines – 80, Press machines – 5, Printing machines – 1, Embroidery machines – 1, Compressor – 1 | | | | |
| What form of worker representation is there on site? | □ Union | ☑ Worker Committee | | | |
| there on site? | □ Other | □ None | | | |
| Please give details: | Worker committee | | | | |
| Is there any night production work at the site? | ☐ Yes ☑ No | | | | |
| Are there any on site provided worker accommodation buildings | ☐ Yes ☑ No | | | | |
| accommodation buildings | Please give details: | | | | |
| Are there any off site provided worker accommodation buildings | ☐ Yes ☑ No | | | | |
| accommodation buildings | Please give details: | | | | |
| Were all site provided accommodation buildings included in this audit | ☐ Yes ☑ No | | | | |
| bullarings included in this addit | Please give details: | | | | |
| | NA | | | | |

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| Audit Parameters | | | | | | |
|---|---------------------------------|-------|--|--|--|--|
| Time in and time out | Day 1 | | | | | |
| | In | 09:15 | | | | |
| | Out | 18:00 | | | | |
| Audit type: | PERIODIC | | | | | |
| Was the audit announced? | 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 Mihir Shah / General Manager | | | | | |
| Is further information available | No | | | | | |

| Audit attendance | Management | Worker Representatives | | | |
|---|--------------------------|----------------------------------|-----------------------|--|--|
| | Senior management | Worker Committee representatives | Union representatives | | |
| A: Present at the opening meeting? | Yes | Yes | No | | |
| B: Present at the audit? | Yes | Yes | No | | |
| C: Present at the closing meeting? | Yes | Yes | No | | |
| Reason for absence at the opening meeting | There is no trade union. | | | | |
| Reason for absence during the audit | There is no trade union. | | | | |
| Reason for absence at the closing meeting | There is no trade union. | | | | |

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 | |
| | Permanent | Temporary | Agency | Permanent | Temporary | Agency | workers | Total |
| Worker numbers – male | 28 | 0 | 0 | 0 | 0 | 0 | 0 | 28 |
| Worker numbers – female | 71 | 0 | 0 | 0 | 0 | 0 | 0 | 71 |
| Total | 99 | 0 | 0 | 0 | 0 | 0 | 0 | 99 |
| Number of Workers interviewed – male | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 3 |
| Number of Workers interviewed – female | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 7 |
| Total – interviewed sample size | 10 | 0 | 0 | 0 | 0 | 0 | 0 | 10 |

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| Nationalities Structure | | | | | | | |
|---------------------------------|--|--|--|--|--|--|--|
| Indian | | | | | | | |
| Nationality 1: Indian | approx %: 100% | | | | | | |
| ✓ Yes □ No Please give details: | | | | | | | |
| Workers on piece rate: | 0% | | | | | | |
| Paid hourly: | 0% | | | | | | |
| Salaried: | 100% | | | | | | |
| Paid daily: | 0% | | | | | | |
| Paid weekly: | 0% | | | | | | |
| Paid monthly: | 100% | | | | | | |
| Other: | 0% | | | | | | |
| | Indian Nationality 1: Indian ✓ Yes □ No Please give details: Workers on piece rate: Paid hourly: Salaried: Paid daily: Paid weekly: Paid monthly: | | | | | | |

Details for other:

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NA

| Worker Interview Summary | | |
|---|---|--|
| Were workers aware of the audit? | ☑ Yes □ No | |
| Were workers aware of the code? | ☐ Yes ☑ No | |
| Number of group interviews: | 1 group of 4 | |
| 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. | ☑ Yes □ No Please give details: | |
| Interviews were done in private and the confidentiality of the interview process was communicated to the workers? | ☑ Yes □ No | |
| In general, what was the attitude of the workers towards their workplace? | ☑ Favorable ☐ Non-favourable ☐ Indifferent | |
| What was the most common worker complaint? | Employees do not have any complaints. | |
| What did the workers like the most about working at this site? | Timely salary, no health and safety issues, positive Management- easily approachable, clean working place, no abusive language, no case of any harassment | |
| Any additional comment(s) regarding interviews: | The Management has taken care of them during the COVID-19 lockdown | |
| Attitude of workers to hours worked: | The workers vouched that the overtime is voluntary and if there is any need for overtime, permission is sought from them and the working hours are noted for overtime and the payment is made for the overtime work hours @ 200% of the basic salary. | |
| Is there any worker survey information available? | ☐ Yes ☑ No Please give details: | |

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Attitude of workers:

10 workers were selected for interview, they were interviewed as 1 groups of 4 employees and balance 06 workers were interviewed individually. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management.

Attitude of worker's committee/union reps:

Based on the interaction with workers committee representative, it was noted that workers committee representative is not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received. No Union does exist.

Attitude of managers:

During the audit days, the management of establishment was very cooperative and very transparent to share the issues & information, Attitude of the management was found positive towards the audit and the audit process. The establishment was found aware of the requirements of a social audit & its applicable ETI and local law. The management was very transparent and cooperative during audit. The management was receptive to the findings and was very keen to implement all the measures to achieve compliance in their facility.

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DQS CFS GmbH

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

OA: 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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

| 1.Facility has a Human Right and Labour policy STICH-HRP-022 dated 1.1.2024 endorsed by Partner, and |
|---|
| the same has been displayed in the facility prémises and communicated to the employees during interna |
| trainings dated |
| 2.Partner is responsible for the implementation of the Policy. |

3.The stakeholder mapping is not done by the facility.
4.Facility has a Whistle Blower Policy number STICH-WBP-38 dated 01-01-2024.

5.Facility has provided training on human rights on 1-04-2024.
6.Facility has a policy on data privacy policy STICH-DPP-031 dated 01-01-2024.
7.Supplier Code of Conduct vide STITCH-SSP-28 dated 01-01-2024 which includes human rights policy is

| communicated to the contractors / agencies, suppliers and acknowledgement is obtained verified the acknowledgement From Pratham Enterprise Ahmedabad |
|---|
| Evidence examined: |
| Company policy on Human Rights and Labour, whistle blower and Data privacy. Interaction with Management and Interview with employees. Company HR Manual. Employees' training records |
| Any other comments: |
| NA |
| |

| Policy statement that expresses commitment to respect human rights? | ☑ Yes □ No |
|---|--|
| 3 | Please give details: |
| | Facility has prepared Human Right and Labour policy STICH- HRP-022 dated 01-01-2024 |
| Are the policies included in workers' manuals? | ☐ Yes ☑ No |
| | Please give details: |
| | The policies are displayed in the shop floor |

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| Does the business have a designated person responsible for implementing standards concerning Human Rights? | ☑ Yes □ No | |
|--|---|---|
| | Please give details: | |
| | Partner is responsible for the in | nplementation of the Policy |
| Does the business have a transparent | ☑ Yes □ No | |
| system in place for confidentially reporting, and dealing with human rights | Please give details: | |
| impacts without fear of reprisals towards the reporter? | Facility has provided a following confidential reporting anonymous and any breaches of policies and 1. Workforce Representative 2. Works committee. 3. Grievance Committee 4. Suggestion and Complaint Bo | ously without fear of retaliation d procedures. |
| Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement) | ☑ Yes □ No | |
| Does the business demonstrate effective | ☑ Yes □ No | |
| data privacy procedures for workers' information, which is implemented? | Please give details: | |
| | Seen the data privacy policy vide 2024 The data privacy are for th under lock and key in HR's roon since all the salary are bank trai password protected. The health Confidential | ne personal files, which are kept n, the salary of the employees , nsfer, the computers are |
| Me | easuring Workplace Impact | |
| Annual worker turnover(Number of | Last year | 3.0% |
| workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)) | This year | 2.0% |
| Current % quarterly (90 days) turnover(Number of workers leaving | 2.0% | |
| 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]) | | |
| 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 | 10.0% |
| | This year | 10.0% |
| 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) | 10.0% | |

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| Are accidents recorded? | ✓ Yes ☐ NoPlease give details:Seen the accident incident reginal happening in the factory during | ster. There are no accidents g the last 2 years as per Form 15 |
|--|--|---|
| 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 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 This year | 0.0% |
| % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months | 6 month 12 month | 0.0% 0.0% |
| % of workers that work on average more than 60 total hours / week in the last 6 / 12 months | 6 month 12 month | 0.0% |

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| | Observation | | |
|--------------------------------|---|---|--|
| [Back to findings | summary] | | |
| | Observation | | |
| Status | CLOSED | | |
| Reference | ZAF600542176 | | |
| Clause | 0A - Universal Rights coverin | g UNGP | |
| Issue Title | 685 - No / inadequate systen stakeholders and assess, pri negative human rights impa | n to identify relevant oritise or minimise the ct of the site | |
| Subcategory | Human rights | | |
| New or carried over? | □ New | ☑ Carried Over | |
| Raised by audit | ZAA420390006 | | |
| Resolved by audit | ZAA600075940 | | |
| Root cause | ☐ Training [| ☐ System | |
| | □ Costs □ | ☐ Lack of workers | |
| | ☑ Other | | |
| Root cause - Other | N/A | | |
| Explanation to the observation | There is no stake holders' mappings | | |
| Actions | N/A | | |
| Additional comments | POLICY DISPLAY Please upload photo policy displayed Photo not required as it is ar | n observation. | |

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OB - Management Systems and code Implementation [Summary of Findings]

OB: 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:

Based on facility tour and review of records, facility has implemented the ETI base code and the code has been displayed in notice board and communicated to all the employees during induction training. Partner is responsible for compliance with the code.

Based on review of records that facility had obtained legally required Business license and approved plant layout.

The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.

The ETI based code was posted on-site for employee review.

The facility had set up policy and appointed one staff to update labor law requirements

The ETI code of conduct was signed off with the supplier
There is evidence of the supplier audit for the year 2023-24 as per the audit plan . The audit of Omkar Graphics on 10.10.2023, Siddhi Vinayak Graphics on 2.05.2024, Ajanta Universe on 4.5.2024, Anshul Multitech done on 15.5.2024

The Social Risk Assessment has done vide Stitch-SRA/01 on 10.06.2024

The internal audit was done on 1.6.2024, there are 3 ncrs raised and the NCR were closed on 8.6.2024.

Evidence examined:

| 1 | Facility | Policy | and I | Drocac | Hiirac |
|---|------------|--------|-------|-----------|-----------|
| | rac iiii v | POINT | anco | P1 ()(P(| 11111 🖰 🥆 |

2.Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.

3.Company Manual contains détails of Code and Business Ethics with the commitment of being compliant

| in all aspects of business and integrity aligned with the client's requirement and local law |
|--|
| Any other comments: |
| NA |
| |

| Management Systems | |
|---------------------------------------|---------------------------------|
| subject to any fines/prosecutions for | ☐ Yes ☑ No Please give details: |
| | There is no prosecution |

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| Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & | ☑ Yes □ No |
|---|--|
| | Please give details: |
| abuse? | The child labour policy STITCH-CLP-06, Child remediation policy STITCH-CRP-07, young workers policy STITCH-NCYWP-25, forced labour policy STITCH-FLP-16, anti harassment policy, STITCH-ASHP-04 zero abuse policy STITCH-ZAP-41, ethical policy STITCH-EBBP-15, anti-discrimination policy STITCH-ADB-03 Anti Bribery Policy STITCH-ABP-01 seen and the policies are displayed in the local language |
| If Yes, is there evidence (an indication) of effective implementation? Please give details. | The policies are displayed. The personal files of 10 employees on sample basis seen. The age proof are there. There is no evidence of forced labour in the files. No part of salary is withheld as inferred from the salary record. Interview with 10 employee's shows there is no discrimination, nor there are no cases of any harassment |
| Have managers and workers received | ☑ Yes □ No |
| training in the standards for forced labour, child labour, discrimination, | Please give details: |
| harassment & abuse? | The ETI Code of Conduct training is given to all employees on 26.2.2024 and 7.6.2024 |
| If Yes, is there evidence (an indication) | ☐ Yes ☑ No |
| that training has been effective e.g. training records etc.? Please give details | Please give details: |
| | The training is not effective , 6 out 10 employees could not explain the code of Conduct during interactions. |
| Does the site have any internationally | ☐ Yes ☑ No |
| recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)? | Please give details: |
| other social addits): | NA |
| Is there a Human Resources manager/department? | ✓ Yes □ No |
| manager/department: | HR & Admin manager is taking care of the Human resources activities |
| Is there a senior person /manager | ☑ Yes □ No |
| responsible for implementation of the code? | Please give details: |
| | Partner is responsible for compliance with the code. |
| Is there a policy to ensure all worker information is confidential? | ☑ Yes □ No |
| | Please give details: |
| | The policy of confidentiality vide STITCH-CP-03 dated 1.1.2024 |
| Is there an effective procedure to ensure confidential information is kept confidential? | ☑ Yes □ No |
| | Please give details: |
| | All the information about the personal files are kept confidential. The salaries are transferred to the banks and the individual notifications are sent by the bank to the respective mobile phones. The health check up is kept confidential. |

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| Are risk assessments conducted to evaluate policy and procedure effectiveness? | ☑ Yes □ No |
|--|---|
| | Please give details: |
| | The Social Risk Assessment has done vide Stitch-SRA/01 on 10.06.2024 |
| Does the facility have a process to address issues found when conducting | ☑ Yes □ No |
| risk assessments, including | Please give details: |
| implementation of controls to reduce identified risks? | The internal audit was done on 1.6.2024 , there are 3 ncrs raised and the NCR were closed on 8.6.2024. |
| Does the facility have a policy/code which require labour standards of its own | ☑ Yes □ No |
| suppliers? | Please give details: |
| | TheETI code of Conduct is signed off with the suppliers. |
| | Land Rights |
| Does the site have all required land rights licenses and permissions (see | ☑ Yes □ No |
| SMETA Measurement Criteria)? | Please give details: |
| | Facility has copy of building occupation certificate with land registry papers as required by law. All approvals were verified. |
| Does the site have systems in place to conduct legal due diligence to recognize | ☑ Yes □ No |
| and apply national laws and practices | Please give details: |
| relating to land title? | Facility has 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? | ☑ Yes □ No |
| procedures specific to faile rights: | Please give details: |
| | Facility has compensated the owner for the land prior to the facility being built |
| Is there evidence that facility/site compensated the owner/lessor for the | ☑ Yes □ No |
| land prior to the facility being built or expanded? | Please give details: |
| | Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land. |
| Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts? | ☑ Yes □ No |
| | Please give details: |
| | Facility has written policy to check all legal aspects before taking any land. Facility has taken legal opinion before taking the land. |
| Is there any evidence of illegal | ☐ Yes ☑ No |
| appropriation of land for facility building or expansion of footprint? | Please give details: |
| | NA |

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| | Non-Co | ompliance | | | Evidence |
|-----------------------------------|---|---|--|---|----------|
| [Back to findings | summary] | | | | |
| | Non-Co | ompliance | |] | |
| Status | CLOSED | | | | |
| Reference | ZAF600558628 | | | | |
| Clause | 0B - Manageme Implementation | nt Systems and co | ode | | |
| Issue Title | 687 - The ethica audits) is not co | l Code (i.e. ETI Ba mmunicated to th | se Code for SMETA ne site's employees | | |
| Subcategory | Site's Awarenes | s of Code/Legal R | equirements | | |
| New or carried over? | ☑ New | □ Ca | rried Over | | |
| Resolved by audit | ZAA600075940 | | | | |
| Root cause | ☑ Training | □ Sy | stem | | |
| | □ Costs | □ La | ck of workers | | |
| | □ Other | | | | |
| Root cause - Other | | | | | |
| ETI code | 0.B.3 - Suppliers Code to all emp | are expected to loyees. | communicate this | | |
| Explanation to the non compliance | The training on effective. 6 out code during into | the ETI Code of C 10 employees cou eractions. | onduct is not ald not explain the | | |
| Follow up method | ☐ Follow up au | ıdit ☑ De | esktop audit | | |
| Timescale | □ Immediate | □ 30 days | ☑ 60 days | | |
| | □ 90 days | □ 120 days | □ 180 days | | |
| | □ 365 days | □ Other | | | |
| Actions | The training on | the ETI code will | be imparted. | | |
| Additional comments | ETI BASE CODE NC closed based | TRAINING d on evidence upl | oaded. | | |

Audit company:
DQS CFS GmbH

Report reference: ZAA600075940

Start Date: 2024-07-11

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

Evidence examined:

- 1. Personnel files (all were checked)
- 2. Resignation records of recent 3 months
- 3. Factory rules
- 4. Employee handbook
- Management and employee interview

NA

| Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected) | ☐ Yes ☑ No Please give details: |
|---|---|
| Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected) | ☐ Yes ☑ No Please give details: |
| Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected) | ☐ Yes ☑ No Please give details: |
| Are there any restrictions on workers' freedom to terminate employment? | ☐ Yes ☑ No Please give details: There are no restrictions on the workers freedom to terminate employment as there is a notice period of 1 month on either side. |

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| If any part of the business is UK based or registered there & has a turnover over | ☐ Yes ☐ No ☑ Not Applicable |
|---|--|
| £36m, is there a published a 'modern day | Please give details: |
| slavery statement? | NA |
| Is there evidence of any restrictions on workers' freedoms to leave the site at the | ☐ Yes ☑ No |
| end of the work day? | Please give details: |
| | There is no evidence of restrictions on workers' freedoms to leave the site at the end of the work day as inferred from the workers interview. |
| Does the site understand the risks of forced / trafficked / bonded labour in its | ☑ Yes □ No □ Not Applicable |
| supply chain | Please give details: |
| | The supplier audits were done based on the ETI Code of Conduct. |
| Is the site taking any steps taking to reduce the risk of forced / trafficked | ☑ Yes □ No |
| labour? | Please give details: |
| | There are evidence of the background verification before recruitment though the employees are chosen through personal contacts |

Audit company: DQS CFS GmbH Report reference: Start Date: ZAA600075940 2024-07-11

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
- 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:

There is no union at the site

There is workers committee at the site, worker representatives were elected by employees. Based on employee's interview, employees can approach top management directly to report their grievances and necessary corrective action is taken by the management.

Facility has formed a Workers Committee and Grievance committee and conducted meetings once in two months and the minutes of meetings are recorded for verification and future reference.

Based on employee's interview, the facility does not restrict employees from organizing trade unions and has an open mind approach towards the activities of trade unions and their organizational activities. Based on the employee's interview and interaction with facility management, works committee employee representatives are not discriminated and they are free to carry out their functions like meetings on periodical basis

Evidence examined:

- 1 Social compliance system program and procedure
- Suggestion box complain feedback
- 3. Meeting minutes

Any other comments:

- 4. Works Committee Minutes dated 18.3.2024 and 5..6.2024
- 5. The worker election is done on 2.3.2024.
- 6. Employee interview and management interview
- 7. Employee handbook and employment contracts were reviewed. They both stated that employees are free to form trade unions. Nobody will be treated differently whether they are members of the union

| - | | |
|--|---------|--------------------|
| NA | | |
| | | |
| What form of worker | □ Union | ☑ Worker Committee |
| representation/union is there on site? (Please add the name of the union or | □ Other | □ None |

| representation/union is there on site? (Please add the name of the union or committee in the textbox) | □ Other | □ None |
|---|-----------------------------|------------------------------|
| Other details: | There are 2 from the Manage | ement and 5 from the workers |
| Is it a legal requirement to have a union? | □ Yes ☑ No | |
| Is it a legal requirement to have a worker's committee? | ☐ Yes ☑ No | |

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| Is there any other form of effective | ☑ Yes □ No |
|---|--|
| worker/management communication channel? (Other than union/worker | Please give details: |
| committee e.g. H&S, sexual harassment) | Facility has provided suggestion box, where employees are free to express their problems / suggestions / complaints for any grievances. While interviewing, all employees reported that they are free to approach the management for any problem |
| Is there evidence of free elections? | ☑ Yes □ No |
| Does the supplier provide adequate facilities to allow the Union or committee | ☑ Yes □ No |
| to conduct related business? | Please give details: |
| | Based on the employee's interview and review of records that, works committee employee representatives are free to carry out their functions like meetings with adequate facilities on periodical basis and the record of the same was maintained |
| Name of union and union representative, if applicable: | NA |
| Is there evidence of free elections? | ☑ Yes □ No □ Not Applicable |
| If there is no union, is there a parallel means of consultation with workers e.g. worker committees? | Worker committees existed in facility |
| Is there evidence of free elections? | ☐ Yes ☐ No ☑ Not Applicable |
| Are all workers aware of who their representatives are? | ☑ Yes □ No |
| · | Please give details: |
| | Based on workers interview it was noted that all workers are aware about the workers representative, |
| Were worker representatives freely elected? | ☑ Yes □ No |
| Date of last election: | 2024-03-04 |
| Do workers know what topics can be raised with their representatives? | ☑ Yes □ No |
| Were worker representatives/union representatives interviewed? | ☑ Yes □ No |
| If Yes, please state how many: | 1.0 |
| Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc. | The Participation Committee is arranging meeting within three months and gathering problems coming from workers' end and approaching them to the management. Last meeting was conducted on 5.6.2024. Minutes of works committee was continued 20 minutes |
| Are any workers covered by Collective Bargaining Agreement (CBA)? | ☐ Yes ☑ No |

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

Version 6.1

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
- General 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

••Adequate clean toilets segregated by gender were always available to employees, there are male WC-6, urinal-7, Female Toilet-7

••Ventilation, temperature and lighting were adequate for the production processes.

••Minutes of meetings show that there are monthly meetings between the workers and the Facility management, and each point is acted on. The HSE meeting is done on 6.3.2024 and 1.6.2024

2.Fire Safety

- •There were at least 2 exits from each work area and these were clearly marked
- •Firefighting equipment like 14 ABC fire extinguishers, 2 Water Fire system and 4 CO2 fire extinguishers, 2 fire alarm call points, 3 Emergency Lights, evacuation plan 3 were provided in the facility which was found adequate.

•Evacuation diagrams were posted in all areas .

- •Fire drills were organized and recorded every 2 months as per the law . the mock drill was conducted on 28.6.2024 and 27.4.2024. The time taken is 2 mins 33 sec.
- •Facility has marked all the exits and emergency exits in a language understood by majority of the employees

-One of the emergency lights is found to be not glowing on the day of the audit

- There are no instructions for the use of the fire extinguishers near the main gate as seen on the day of the audit
- 3. Machine & Electrical safety
- •All machine and electrical equipment were maintained in good condition

•The test report of compressor is done by Unique Marketing on 27/5/2024

- •There were competent mechanic & electricians at the site to do the electrical work
- •Facility had obtained periodic inspection certificate for all the machineries used
- Medical Services
- Facility has provided well equipped first aid boxes in each production area (Total 04 first aid boxes) and they were well stocked.
- •There were 10 first aiders and they had been trained through Red Cross Society on 22/6/2022 valid for three years.

Evidence examined:

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NA

Version 6.1

| Health and Safety Policy No STITC- EHSP-12 |
|---|
| Health and safety manual |
| Stability Certificate is valid until no change in structure. |
| Industrial accident records – Updated till June 2024 |
| There were 10 first aiders and they had been trained through Red Cross Society on 22/6/2022 valid for |
| three years. |
| Health & Safety Committee meeting minutes dated 6.3.2024 and 1.6.2024 |
| Drinking Water Test report done by Metro Enviro Chem Associates on 5.5.2024 |
| Fire drills were organized and recorded every 2 months as per the law . the mock drill was conducted on |
| 28.6.2024 and27.4.2024 . The time taken is 2 mins 33 sec. |
| Verified Ambient Air Quality done by Metro Enviro Chem Associates on 5.5.2024 |
| Verified DG Noise Monitoring done by Metro Enviro Chem Associates on 5.5.2024 |
| Verified Indoor Noise Monitoring done by Metro Enviro Chem Associates on 5.5.2024 |
| Lux Intensity done by Metro Enviro Chem Associates on 5.5.2024 |
| Indoor Air Quality done by Metro Enviro Chem Associates on 5.5.2024 |
| Interaction with Management and Interview with employees |
| Any other comments: |

| Does the facility have general and occupational Health & Safety policies and | ☑ Yes □ No |
|--|---|
| procedures that are fit for purpose and are these communicated to workers? | Please give details: |
| are these communicated to workers: | Facility had established general Health & Safety, occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers during induction training |
| Are the policies included in workers' manuals? | ✓ Yes □ No |
| | Please give details: |
| | Facility had included the social compliance policies in worker's manual |
| Are there any structural additions without required permits/inspections | ☐ Yes ☑ No |
| (e.g. floors added)? | Please give details: |
| | Facility had maintained the approved plant layout as per the current setup. |
| Are visitors to the site informed on H&S and provided with personal protective | ☑ Yes □ No |
| equipment? | Please give details: |
| | No PPE is required as it is a dry process. |
| Is a medical room or medical facility | ☐ Yes ☑ No |
| provided for workers?(This section is to list evidence to support system | Please give details: |
| description (Documents éxamined & relevant comments. Include | NA |
| renewal/expiry date where appropriate)) | |
| Is there a doctor or nurse on site or there is easy access to first aider/ trained | ☑ Yes □ No |
| medical aid? | Please give details: |
| | 3 First Aid boxes are provided by the facility as requirement by local law requirement |

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| Where the facility provides worker transport – is it fit for purpose, safe, | ☐ Yes ☑ No |
|---|--|
| maintained and operated by competent | Please give details: |
| persons e.g. buses and other vehicles? | NA as the workers come from the nearby places |
| Is secure personal storage space provided for workers in their living space | ☐ Yes ☑ No |
| and is fit for purpose? | Please give details: |
| | There ae no living space |
| Are H&S Risk assessments are conducted (including evaluating the arrangements | ☑ Yes □ No |
| for workers doing overtime e.g. driving | Please give details: |
| after a long shift) and are there controls to reduce identified risk? | The risk assessment vide STITCH/HIRA /01 dated 1.06.2024 Factory has developed risk assessment analysis for all areas and functions and takes effective steps to reduce the associated risks. The risks identified on 1.6.2024 are burn injury, electric shock, Fire, Gangway block, emergency gate closed. There is no overtime and all the workers come from nearby places |
| Is the site meeting its legal obligations on environmental requirements | ☑ Yes □ No |
| including required permits for use and | Please give details: |
| disposal of natural resources? | Gujarat Pollution Control Board Notification No.: CPCP/P-1/12/352040 DT 12-04-2016 Annex S.no. 84: "Manufacturing of Garment by stitching from ready cloth having white Category Registration exempted from Pollution consent |
| Is the site meeting its customer | ☑ Yes □ No |
| requirements on environmental standards, including the use of banned | Please give details: |
| chemicals? | There are no banned chemicals being used. |

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| | Non-Compliance | Evidence |
|-----------------------------------|--|---------------------------------------|
| [Back to findings | s summary] | |
| | Non-Compliance | |
| Status | CLOSED | |
| Reference | ZAF600558629 | |
| Clause | 3 - Working Conditions are Safe and Hygienic | |
| Issue Title | 210 - Inadequate/ poorly functioning emergency lighting | |
| Subcategory | Fire Safety - Fire exits | |
| New or carried over? | ☑ New ☐ Carried Over | |
| Resolved by audit | ZAA600075940 | |
| Root cause | ☐ Training ☑ System | |
| | ☐ Costs ☐ Lack of workers | |
| | □ Other | |
| Root cause - Other | | |
| Local law issue | As per Rules prescribed under Sec. 38 and 41 of Factories Act, 1948: Gujarat Factories Rules, 1963/Rule 66-A(9)(e);, The exits shall be clearly visible and suitable illuminated with suitable arrangements, whatsoever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply. | NC- No Glowing Emergency light.jpg |
| ETI code | 3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. | |
| Explanation to the non compliance | One of the emergency lights is found to be not glowing on the day of the audit, | |
| Follow up method | ☐ Follow up audit ☐ Desktop audit | |
| Timescale | ☐ Immediate ☐ 30 days ☐ 60 days | |
| | □ 90 days □ 120 days □ 180 days | |
| | □ 365 days □ Other | |
| Actions | All the emergency lights will be made functional | |
| Additional comments | EMERGENCY LOGHT GLOWING NC closed based on evidence uploaded. | |

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End Date:



| | Non-Compliance | Evidence |
|-----------------------------------|--|--|
| [Back to findings | summary] | |
| | Non-Compliance | |
| Status | CLOSED | |
| Reference | ZAF600558630 | |
| Clause | 3 - Working Conditions are Safe and Hygienic | |
| Issue Title | 190 - No fire fighting equipment signage / labelling / instructions | |
| Subcategory | Fire Safety - Fire Fighting Equipment | |
| New or carried over? | ✓ New ☐ Carried Over | |
| Resolved by audit | ZAA600075940 | |
| Root cause | ☐ Training ☑ System | |
| | ☐ Costs ☐ Lack of workers | |
| | □ Other | |
| Root cause - Other | | |
| ETI code | 3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. | NC- No Instruction for the sue of the fire extinguishers.jpg |
| Explanation to the non compliance | There is no instructions for the use of the fire extinguishers near the main gate as seen on the day of the audit. | |
| Follow up method | ☐ Follow up audit ☐ Desktop audit | |
| Timescale | ☐ Immediate ☐ 30 days ☐ 60 days | I |
| | □ 90 days □ 120 days □ 180 days | I |
| | □ 365 days □ Other | |
| Actions | The instructions for the use of the fire extinguishers will be displayed. | |
| Additional comments | FIRE EXTINGUISHERS INSTRUCTION DISPALY NC closed based on evidence uploaded. | l |

Audit company: DQS CFS GmbH

Report reference: ZAA600075940

Start Date: 2024-07-11

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 labor can be reported to facility management.

5.Based on the employee interviews, review of facility's Anti Child Labor& Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor

Evidence examined:

Child Labor and Child Labor Remediation Policy. Age Proof records of 10 out of 10 selected samples. Interaction with Management and Interview with employees

| Any | other | comn | nents: |
|-----|-------|------|--------|
|-----|-------|------|--------|

NA

| Legal age of employment: | 15 |
|--|------------------------------------|
| Age of youngest worker found: | 22 |
| Are there children present on the work floor but not working at the time of audit? | ☐ Yes ☑ No |
| Percentage of under 18's at this site (of total workers) | 0.0% |
| Are workers under 18 subject to hazardous work assignments? | ☐ Yes ☑ No Please give details: NA |

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5 - Living Wages are Paid [Summary of Findings]

Version 6.1

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
- 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.Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules. 5.Based on employee's interview and record review all the employees are received appointment letter
- with written and understandable information about their employment conditions in respect to wages

Evidence examined:

Facility Policy Salary registers

Pay slip and Time records for 10 selected samples for 03 months July 2023,(random), October 2023(random) and June 2024(current)

Leave with wage records (Form No: 15) and Leave encashment

Any other comments:

NA

| 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: 208.0 | 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 |

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| 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: 476 Per Week: null Per Month: 12376 | Actual Per Day: 0 Per Week: 0 Per Month: 12376 | NO | |
|---|---|--|--|--|
| Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month) | Legal Maximum Per Day: null Per Week: null Per Month: null | Actual Per Day: 0 Per Week: 0 Per Month: 0 | NO | |
| | Wages Analysis: | | | |
| Were accurate records shown at the first request? | ☑ Yes □ No | ☑ Yes □ No | | |
| Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria) | | cords for 10 selected s andom) , October 202 | | |
| Are there different legal minimum wage grades? If Yes, please specify all. | ☑ Yes ☐ No With Effect from 1.4. 12692 INR and Skille | 2024, Unskilled 12376 d 12922 INR | 5 INR, Semi skilled | |
| If there are different legal minimum | ☑ Yes ☐ No ☐ Not Applicable | | | |
| grades, are all workers graded and paid correctly? | Please give details: | | | |
| For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | □ Below legal min☑ Above | ☑ Meet | | |
| Lowest actual wages found: Note: full time employees and please state hour / week / month etc. | contracted salary is 1 | the month of June 20 2662 INR, days work n, 33 INR ESI Deductio | ed is 9 weekly off 4, | |
| Please indicate the breakdown of workforce per earnings | 40.0% of workforce e | rning under minimur earning minimum wag earning above minimi | ge | |
| Bonus Scheme found: Please specify details: | salary earned from 1 Note: type of employ | d:The bonus is given (.4.2022 to 31.3.2023 , ree (e.g. full time, tem . /hour /week /month | given on 8.11.2023. op, etc.) and please | |
| What deductions are required by law e.g. social insurance? Please state all types: | ESI, PF | | | |
| Have these deductions been made? | ☑ Yes □ No | | | |
| Please list all deductions that have been made. | ESI, PF | | | |
| Please list all deductions that have not been made. | None | | | |
| Were appropriate records available to verify hours of work and wages? | ☑ Yes □ No | | | |
| Were any inconsistencies found? (if yes describe nature) | □ Yes ☑ No | | | |

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| inst | Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not baid for their time) | ☑ Yes □ No |
|------|---|--|
| | | Please give details: |
| | | The wages were verified by the in out records. |
| | Is there a defined living wage: | ☐ Yes ☑ No |
| | 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. | Please give details: |
| | If yes, what was the calculation method | ☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage |
| | used. | ☐ Figures provided by ☐ Living Wage Foundation UK |
| | | ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation |
| | | ☐ Other – please give details: |
| | Are there periodic reviews of wages? If Yes give details (include whether there is | ☑ Yes □ No |
| | consideration to basic needs of workers | Please give details: |
| | us discretionary income). | Facility is located in Gujurat Where government revise applicable minimum wage rate twice per after consideration to basic needs of workers plus discretionary income and issue minimum wage notification for the factories to follow. Facility revises wages of the employees accordingly |
| | Are workers paid in a timely manner in line with local law? | ☑ Yes □ No |
| | Is there evidence that equal rates are | ☑ Yes □ No |
| | peing paid for equal work: | Please give details: |
| | | Equal Work equal pay- verified from the workers salary and interview |
| | How are workers paid: | □ Cash □ Cheque |
| | | ☐ Bank Transfer ☐ Other |

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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.In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either. 2.Based on provided attendance records, the working hours analysis as below:
- a)During employee interview, all the 10 randomly selected employees stated that they worked overtime on voluntary basis.
- b)The facility has implemented electronic system to record IN/OUT time recording for all the employees. Based on the provided attendance records, the no overtime hours worked

Evidence examined: Facility Policy. In/Out time records and Pay slip and Time records for 10 selected samples for 03 months July 2023 (

random), October 2023 (random), June 2024 (Current)
Interaction with management and Employees.

Employees contracts Production Records

| Any ot | her | com | ment | s: |
|--------|-----|-----|------|----|
|--------|-----|-----|------|----|

NA

| Working hours' analysis | | |
|--|----------------------|--|
| Systems & Processes | | |
| What timekeeping systems are used? | Face Reading | |
| Is sample size same as in wages section? | ☑ Yes □ No | |
| | Please give details: | |

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Sedexglobal.com

| Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.) | ☑ Yes □ No | |
|---|---|--|
| Are there any other types of contracts/employment agreements used? | □ Yes ☑ No | |
| Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.) | □ Yes ☑ No | |
| Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period? | ☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain) | |
| Is this allowed by local law? | ☑ Yes □ No | |
| Maximum number of days worked without a day off (in sample): | 6 | |
| Stand | ard/Contracted Hours worked | |
| Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency) | ☐ Yes ☑ No % of workers: | |
| | null% Frequency: | |
| Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.) | □ Yes ☑ No | |
| Overtime Hours worked | | |
| Actual overtime hours worked in sample (State per day/week/month) | 0 | |
| Combined hours (standard or contracted + overtime hours = total) over 60 found? | ☐ Yes ☑ No | |
| overtime flours (cotal) over do found. | Please give details: | |
| | NA | |
| Approximate percentage of total workers on highest overtime hours: | 0.0% | |
| Is overtime voluntary? (Please detail | ☑ Yes □ No □ Conflicting Information | |
| evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements) | Please give details: | |
| | The overtime is voluntary based on the employment contract and workers' interview | |
| Overtime premium | | |

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| Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages) | ☑ Yes □ No □ N/A – there is no legal requirement to OT premium |
|---|---|
| | Please give details: |
| | The overtime is given @200% of the standard wages but in the sampled months there are no overtime. |
| Is overtime paid at a premium? | ☑ Yes ☐ No The overtime is given @200% of the standard wages but in the sampled months there are no overtime. |
| If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. | ☑ No ☐ Consolidated ☐ Collective Bargaining agreements ☐ Other |
| Please give details | NA |
| 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 | ☑ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary ☐ Safeguards are in place to protect worker's health and safety |
| any checked boxes above e.g. detail of consolidated pay / CBA or Other) | ☐ Site can ☐ Other reasons demonstrate (please specify) exceptional circumstances |
| Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other | NA |
| Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes? | □ Yes ☑ No |
| If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule? | □ Yes ☑ No |

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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. Partner is responsible for the investigation and disposal of discrimination case.

- 3.Based from wage records review, the facility provides the same pay for male/female employees for same work of similar nature.
- 4.No employee was required to do the examination of the Pregnancy, hepatitis B virus and HIV.
- 5.Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.
- 6.Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
- 7.There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.

8. There was no evidence of sexual harassment

9. The POSH Committee is done on 8.3.2024 and 7.6.2024

Evidence examined:

Facility Policy.

The hiring and termination procedure leave application records and employee handbook. Time in and out records, full and final settlement records and training records.

Appointment letter with terms and conditions for 10 out 10 selected samples.

Salary and other benefit records.

Interaction with management and Employees

| Any other comments | Α | ny | oth | ıer | com | me | nts |
|--------------------|---|----|-----|-----|-----|----|-----|
|--------------------|---|----|-----|-----|-----|----|-----|

NA

| Gender breakdown of Management + Supervisors (Include as one combined group) | Male: 70.09 | % | Female: 30.0% |
|--|----------------------|-----------------------------|---|
| Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst) | 5 out of 15 employed | es are in managerial | positions |
| Is there any evidence of discrimination based on race, caste, national origin, | ☑ Hiring | ☐ Compensation | ☐ Access to training |
| religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation? | ☐ Promotion | ☐ Termination or retirement | No evidence of discrimination found |
| Please give details | NA | | |
| Professional Development | | | |

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| What type of training and development are available for workers? | The training on the ETI Code of Conduct is imparted on 8.5.2.204, Training on Health and safety on 6.5.2024, Training on PPE on 3.6.2024, Training on Fire Training on 28.6.2024, Training on Forst Training on 13.4.2024, Training on Anti bribery on 25.6.2024 |
|---|--|
| Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details) | ☑ Yes □ No |

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8 - Regular Employment Is Provided [Summary of Findings]

Version 6.1

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:

Based on record review and employee's interview appointment letters issued to all 10 out of 10 selected employees.

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

Facility does not employ any migrant workers.

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

Evidence examined: Facility Policy. Appointment letter with terms and conditions for 10 out of 10 selected samples. Salary and other benefit records. Interaction with management and Employees Any other comments: NA

| 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 | |
| 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 | |

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

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8A - Sub-Contracting and Homeworking [Summary of Findings]

8A: Compliance Requirements

NA

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:** The printing and embroidery are outsource as confirmed by the management, Evidence examined: Facility Policy. Inward and outward material registers. Production records. Interaction with management Any other comments:

| Summary of sub-contracting – if applicable | | |
|---|---|--|
| Is there any sub-contracting at this site? ☑ Yes □ No | | |
| Process su | ubcontracted | |
| Process Subcontracted | Printing | |
| Name of factory | Elixir Unlimited | |
| Address | 2 Shrinath Estate, Near Uttam Dairy Cros Road, Ahmedabad-380021 | |
| Process subcontracted | | |
| Process Subcontracted | Embroidery | |
| Name of factory | Omkar Graphics | |
| Address | Near Aavkar Traders, Opp. Excel Industry Behrampur, Ahmedabad-380022 | |
| Process si | ubcontracted | |
| Process Subcontracted | Embroidery | |
| Name of factory | Siddhi Vinayak private Limued | |
| Address | 120/1-2, Opposite PWD Gust House, Narol, Ahmedabad | |

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| Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting? | ✓ Yes ☐ NoPlease give details:The capacity of the sub contractors checked and found ok |
|--|--|
| If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details) | ☑ Yes ☐ No It was agreed with the main buyer by email, seen the evidence. |
| Number of sub-contractors/agents used: | 3 |
| Is there a site policy on sub–contracting? | ☑ Yes □ No The policy of sub contracting vide STITCH- SAP-42 |
| What checks are in place to ensure no child labour is being used and work is safe? | The ETI based audit was conducted of the sub contractors. |
| Summar | y of homeworking – if applicable |
| Is homeworking used at this site? | ☐ Yes ☑ No |

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9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

Based on the interaction with the facility management and employee's interview, it is noted that no case of abuse or discipline has happened in the facility and the facility has a written disciplinary procedure that is displayed in the notice board of the facility.

According to the documentation, the facility management had established a disciplinary procedure for employees' misbehavior which included oral warning, written warning and finally termination and the site, had déveloped a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure

As per management interview, document review and employees' interview, there was a policy on Harsh

There is an internal process for grievance and suggestion box has been provided, where employees can report a grievances (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system.

The agreement with external agency for POSH is with Naari Brund Samity dated 21.9.2023.

| There is no grievance procedure displayed near the suggestion box. |
|--|
| Evidence examined: |
| Facility Policy The relevant policy on prevention of harassment and abuse Internal grievance procedure documentation. Training records Interaction with management and Employees Policy on equal opportunity |
| Any other comments: |
| NA |

| Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party? | ☑ Yes □ No | |
|--|--|--|
| | Please give details: | |
| | Facility had Grievance committee committee and the Works Comm | e, Health and Safety nittee, POSH Committee |
| If yes, are workers aware of these channels and have access? Please give details. | The workers are aware of the su to the Management and the wh | iggestion box, communicating istle blowing polices |
| If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details. | Suggestion box which is opened of the WR and whistle blowing p procedure displayed near the su | policies. There is no grievance |
| Which of the following groups is there a grievance mechanism in place for? | ☑ Worker | □ Communities |
| | ☑ Suppliers | □ Other |

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| Please provide grievance mechanism details | Facility had effective grievance mechanism in place where workers, communities & suppliers can express their grievance through Suggestion box, Hot line, committee meeting |
|---|--|
| Are there any open disputes? | ☐ Yes ☑ No |
| | Please give details: |
| Does the site encourage its business partners (e.g. suppliers) to provide | ☑ Yes □ No |
| individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism) | Please give details: |
| Is there a published and transparent disciplinary procedure? | ☑ Yes □ No |
| discipiliary procedure: | Please give details: |
| If yes, are workers aware of these the disciplinary procedure? | ☑ Yes □ No |
| discipiliary procedure: | Please give details: |
| Does the disciplinary procedure allow for deductions from wages (fines) for | ☐ Yes ☑ No |
| disciplinary purposes (see wages section)? | Please give details: |

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| | Evidence | | | |
|-----------------------------------|---|--|--|--|
| [Back to findings summary] | | | | |
| | Non-Compliance | | | |
| Status | CLOSED | | | |
| Reference | ZAF600558631 | | | |
| Clause | 9 - No Harsh or Inhumane Treatment is Allowed | | | |
| Issue Title | 583 - Lack of a detailed grievance procedure that has been communicated to all workers | | | |
| Subcategory | Grievance Procedures | | | |
| New or carried over? | ☑ New ☐ Carried Over | | | |
| Resolved by audit | ZAA600075940 | | | |
| Root cause | ☐ Training ☑ System | | | |
| | ☐ Costs ☐ Lack of workers | | | |
| | □ Other | સાપેવાલ ગોલ્સ / કમાર્યેલ ગોલ્સ ૦ | | |
| Root cause - Other | | NC- No grievance | | |
| ETI code | 9.2 - companies should provide access to a confidential grievance mechanism for all workers | | | |
| Explanation to the non compliance | There is no grievance procedure being displayed near the suggestion box. | | | |
| Follow up method | ☐ Follow up audit ☐ Desktop audit | | | |
| Timescale | ☐ Immediate ☐ 30 days ☐ 60 days | | | |
| | □ 90 days □ 120 days □ 180 days | | | |
| | □ 365 days □ Other | | | |
| Actions | The Grievance procedure will be displayed near the suggestion box | | | |
| Additional comments | GRIEVANCE PROCEDURE ON SUGGESTION BOG DISPALY NC closed based on evidence uploaded. | | | |

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

10A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. Based on the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals.

2. Based on the review of employee personal files, all the employees are holding the legal rights to work

Evidence examined:

Hiring procedure Personnel files Employee handbook Interaction with Management and Employee

Any other comments:

NA

Audit company: DQS CFS GmbH

Report reference: ZAA600075940

Start Date: 2024-07-11

End Date: 2024-07-11

10B2 - Environment 2-Pillar [Summary of Findings]

10B2: Compliance Requirements

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

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

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

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

2024-07-11

Observation **Evidence** [Back to findings summary] Observation Status **CLOSED** Reference ZAF600542175 10B2 - Environment 2-Pillar Clause **Issue Title** 610 - Environmental section of the Sedex SAQ not completed Subcategory General Environmental Permits, & Management systems New or carried Carried Over □ New over? Raised by audit ZAA420390006 Resolved by ZAA600075940 audit Root cause □ Training ☐ System □ Costs □ Lack of workers ☑ Other Root cause -N/A Other

Before the audit, it was noted that the SAQ had not

NC closed based on evidence uploaded.

been completed.

SAQ COMPLITED

N/A

Explanation to

Actions

Additional

comments

the observation

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

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:

Gujarat Pollution Control Board Notification No.: CPCP/P-1/12/352040 DT 12-04-2016 Annex S.no. 84: "Manufacturing of Garment by stitching from ready cloth having white Category Registration exempted from Pollution consent.

Verified Ambient Air Quality done by Metro Enviro Chem Associates on 5.5.2024 Verified DG Noise Monitoring done by Metro Enviro Chem Associates on 5.5.2024 Verified Indoor Noise Monitoring done by Metro Enviro Chem Associates on 5.5.2024

Lux Intensity done by Metro Enviro Chem Associates on 5.5.2024

Indoor Air Quality done by Metro Enviro Chem Associates on 5.5.2024

Evidence examined:

Facility Policy. Pollution permits

Environmental Monitoring Report

Environmental Legal Register

Training records

Interaction with management and Employees.

Aspect Impact Analysis dated 01.06.2024

The water consumption **Power Consumption**

Paper Consumption

Any other comments:

NΑ

Audit company: Report reference: Start Date: End Date:

| Environmental Analysis | | | | |
|--|--|--|--|--|
| Is there a manager responsible for Environmental issues (Name and Position): | Mr Mihir Shah, General Manager | | | |
| Has the site conducted a risk assessment | ☑ Yes □ No | | | |
| on the environmental impact of the site, including implementation of controls to | Please give details: | | | |
| reduce identified risks? | The organization has done the environment impact assessment of Process on1.6.2024 | | | |
| Does the site have a recognised environmental system certification such | ☐ Yes ☑ No | | | |
| as ISO 14000 or equivalent? | Please give details: | | | |
| | NA | | | |
| Does the site have an Environmental policy? | ☑ Yes □ No | | | |
| If yes, is it publicly available? | ☑ Yes □ No | | | |
| If yes, does it address the key impacts from their operations and their | ☑ Yes □ No | | | |
| commitment to improvement? | Please give details: | | | |
| | The key impacts are waste generating, air emissions, wastewater discharging, noise emissions, and the site had set the rated energy conservation and emission reduction policy | | | |
| Does the site have a Biodiversity policy? | ☑ Yes □ No | | | |
| Is there any other sustainability systems present such as Chain of Custody, Forest | ☐ Yes ☑ No | | | |
| Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? | Please give details: | | | |
| Stewardship Council (MSC) etc.: | NA | | | |
| Have all legally required permits been shown? | ☑ Yes □ No | | | |
| | Please give details: | | | |
| | Gujarat Pollution Control Board Notification No.: CPCP/P-1/12/352040 DT 12-04-2016 Annex S.no. 84: "Manufacturing of Garment by stitching from ready cloth having white Category Registration exempted from Pollution consent. | | | |
| Is there a documentation process to record hazardous chemicals used in the | ☐ Yes ☐ No ☑ Not Applicable | | | |
| manufacturing process? | Please give details: | | | |
| | No hazardous chemicals are being used. | | | |
| Is there a system for managing client's | ☐ Yes ☑ No | | | |
| requirements and legislation in the destination countries regarding | Please give details: | | | |
| environmental and chemical issues? | NA | | | |
| Facility has reduction targets in place for environmental aspects e.g. water | ☑ Yes □ No | | | |
| consumption and discharge, waste, energy and green-house gas emissions: | Please give details: | | | |
| energy and green-nouse gas emissions. | Targets set for water consumption, diesel oil consumption, paper consumption | | | |

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End Date:

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Total hazardous waste produced

Waste to recycling

Waste to landfill

Waste to other

Total Product Produced

| Facility has evidence of waste recycling | ☐ Yes ☑ No | | | |
|---|--|--|--|--|
| and is monitoring volume of waste that is recycled. | Please give details: | | | |
| | No items are recycled. | | | |
| Does the facility have a system in place | ☑ Yes □ No | | | |
| for accurately measuring and monitoring consumption of key utilities of water, | Please give details: | | | |
| energy and natural resources that follows recognised protocols or | The electric meter and water meter is calibrated | | | |
| standards? | | | | |
| Has the facility checked that any Sub- Contracting agencies or business | ☐ Yes ☑ No | | | |
| partners operating on the premises have the appropriate permits and licences and | Please give details: | | | |
| are conducting business in line with | NA | | | |
| environmental expectations of the facility? | | | | |
| Usage/discharge analysis | | | | |
| Criteria | Previous year: 2023 | Current year: 2024 | | |
| Electricity Usage: Kw/hrs | 46412 | 23500 | | |
| Renewable Energy Usage: Kw/hrs | 15000 | 1650 | | |
| Gas Energy Usage: Kw/hrs | 0 | 0 | | |
| Has site completed any carbon Footprint Analysis? | No | No | | |
| If Yes, please state result | | | | |
| Water Sources | Municipal | Municipal | | |
| Water Volume Used | 360 | 17 | | |
| Water Discharged | Drain | Drain | | |
| Water Volume Discharged | 120 | 6 | | |
| Water Volume Recycled | 0 | 0 | | |
| Total waste produced | Fabric- 988 Kg Paper- 95 Kg, Plastic- 74 Kg E. Waste- NIL | Fabric- 858 Kg Paper- 76 Kg, Plastic- 59 Kg E. Waste- NIL | | |

Fabric- 988 Kg Paper- 95 Kg, Plastic- 74 Kg

100 kg

Plastic- 74 K

15,00,000 pieces

Fabric- 858 Kg Paper- 76 Kg,

52 kg

Plastic- 59 Kg

9,50,000 pieces

Audit company: Report reference: Start Date: End Date:
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10C - Business Ethics – 4-Pillar Audit

Version 6.1

[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

| record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems. | | | | |
|---|----------------|--|--|--|
| Current Systems: | | | | |
| The company manager was the designated person responsible for implementing standards concerning Business Ethics and it was observed that the site does not indulge incorrupt and discriminative practices. The company has established a business ethics policy which was communicated to workers through posters and training. The site had received and read the business ethics policy of the auditor/audit company | | | | |
| Evidence examined: | | | | |
| The company business ethics policy including Company Ethical Policy STITCH-EBPP-15 Anti Bribery Policy - STITCH-ABP-01 | | | | |
| Any other comments: | | | | |
| NA NA | | | | |
| | | | | |
| Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both as appropriate? | \checkmark | Internal Policy | | |
| | | Policy for third parties including suppliers | | |
| | | se give details: | | |
| | he co Polic | ompany business ethics policy including Company Ethical y STITCH-EBPP-15 Anti Bribery Policy - STITCH-ABP-01 | | |

Audit company: Report reference: Start Date:

ZAA600075940

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2024-07-11

| Does the site give training to relevant personnel (e.g. sales and logistics) on | ☑ Yes □ No | |
|---|---|--|
| business ethics issues? | Please give details: | |
| | The training in anti bribery is imparted on 15.6.2024 | |
| Is the policy updated on a regular (as needed) basis? | ☑ Yes □ No | |
| | Please give details: | |
| | The policy is updated every year. | |
| Does the site require third parties including suppliers to complete their own | ☑ Yes □ No | |
| business ethics training | Please give details: | |
| | The ETI Code of Conduct is signed off with the suppliers, | |

Report reference: ZAA600075940

Start Date: End Date: 2024-07-11 2024-07-11

Attachments



First Aid Box.jpg



Production.jpg



Emergency Light.jpg



NC- No Glowing Emergency light.jpg



Company Board.jpg



Cutting.jpg



Face reading.jpg



Way to Assembly Point.jpg





Gangway.jpg



ETI Code.jpg



Drinking Water.jpg



Overview.jpg



Stores.jpg



packing.jpg



Stitching Section.jpg



NC- No grievance procedure.jpg



ironing.jpg



Arrow Marking.jpg



gents Toilet.jpg



Lunch box stores.jpg



ladies Toilet.jpg



Evacuation Plan.jpg



 $\frac{ \hbox{NC- No Instruction for the sue of the fire}}{ \hbox{extinguishers.jpg}}$



Assembly Point.jpg



Secondary Exit.jpg



Signed CAPR.pdf



ERT.jpg







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Click here for Supplier (B) members:

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

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