



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 280188619	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 286418855
Business name (Company name):	Perfect Sweaters Limited পারফেক্ট সোয়েটার্স লিমিটেড		
Site name:	Perfect Sweaters Limited পারফেক্ট সোয়েটার্স লিমিটেড		
Site address: <i>(Please include full address)</i>	923, Shewrapara, Begum Rokeya Soroni, Mirpur, Dhaka- 1216 ৯২৩, শ্যাওড়াপাড়া, বেগম রোকেয়া স্মরণী, মিরপুর, ঢাকা- ১২১৬	Country:	Bangladesh বাংলাদেশ
Site contact and job title:	Md. Sujon Sheikh- Manager (Hr. & Compliance)		
Site phone:	+8801990-522462	Site e-mail:	compliance@perfectsweaters.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	February 03, 2022		

<p>Audit Company Name & Logo:</p> <p>Benchmarks Co., Ltd. APSCA Audit Firm No.: 11600027</p> 	<p>Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i></p> <p>Perfect Sweaters Limited</p>
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

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

Lead auditor: Jahangir Alam/ Auditor APSCA number: RA21701353
Lead auditor APSCA status: In Good Standing
Team auditor: Farheen Walida Rasha/ Auditor APSCA number: ASCA21705044
Interviewers: Jahangir Alam & Farheen Walida Rasha
APSCA number: RA21701353 & ASCA21705044

Report writer: Jahangir Alam
Report reviewer: Ring Huang

Date of declaration: February 03, 2022

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

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

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>	Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i>
	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		00	00	<ul style="list-style-type: none"> • Nil
0B Management systems and code implementation		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	01	00	<ul style="list-style-type: none"> • OB 1. Facility has not completed the SAQ. • NC 1. Inadequate training provided on ethical code to their workers.
1. Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> • Nil
2. Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> • Nil
3. Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04	00	00	<ul style="list-style-type: none"> • NC 1. Facility runs their factory in commercial cum residential building instead of using industrial purpose. 2. Facility has 8 storied building but no lift facility has been provided as per local law. 3. Ergonomic support has not given to employees adequately to their job.

									4. No training provided on the operating procedure & warnings of dryer machines.
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• Nil
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• Nil
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• Nil
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	00	00	00	• Nil
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• Nil
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	• Nil
9	<u>Harsh or Inhumane Treatment</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	01	00	00	<ul style="list-style-type: none"> • NC 1. Facility has a harassment committee but gaps were identified in below area; <ul style="list-style-type: none"> a. Head of complaint committee have been formatted by male instead of female. b. The complaint committee has not involved two members from outside concerned who will work on gender issues and sexual harassment as required by law. <p>Moreover, training was not provided on mid-level management on harassment & abuse.</p>

10A	Entitlement to Work		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	00	00	00	<ul style="list-style-type: none"> • Nil
10B2	Environment 2-Pillar		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	01	00	00	<ul style="list-style-type: none"> • NC 1. Environment clearance certificate has expired.
10B4	Environment 4-Pillar		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> • Not Applicable
10C	Business Ethics		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	<ul style="list-style-type: none"> • Not Applicable

General observations and summary of the site:

Perfect Sweaters Ltd is a Sweater garment manufacturing factory which is well recognized garments manufacturer & exporter in Bangladesh. The Business is owned by Shafiq Ahmed. Factory started their operation in existing location at November 01, 2016 & incorporated in August 28, 2000 & also having membership in Bangladesh Garment Manufacturers and Exporters Association (BGMEA).

Facility also undergo BSCI Follow-up audit scheme, having C (Acceptable) rating in last audit conducted on January 27, 2021. Facility also having some buyers' approval and undergo their regular monitoring.

The 2-pillars audit was performed in 2 Man-day (2 Auditors in 1 day) as per audit plan. On the day, an opening meeting was held immediately after the auditors' arrival with the factory management. During opening meeting, auditors explained about the audit scope & process and a short presentation about the SMETA audit, auditing tool and auditing approach. Immediately after the opening meeting, a floor visit was conducted with factory management. Documents list was provided and supplied documents were reviewed. For worker's interview, the auditors selected 26 workers from different production processes and different age groups. The workers were comfortable with the management and with the working environment. Auditors verified last 01 year documents as available in the factory. The total audit procedure was completed in one day as per audit plan.

At the end of the audit process, a closing meeting was held to discuss all the findings raised in the onsite CAPR with the factory management. During the closing, they agreed with all the findings and signed the CAPR.

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

Site Details

Site Details			
A: Company Name:	Perfect Sweaters Ltd		
B: Site name:	Perfect Sweaters Ltd		
C: GPS location: (If available)	<table border="1"> <tr> <td>GPS Address:</td> <td>Latitude: 23.791267398096856 Longitude: 90.37559806076361</td> </tr> </table>	GPS Address:	Latitude: 23.791267398096856 Longitude: 90.37559806076361
GPS Address:	Latitude: 23.791267398096856 Longitude: 90.37559806076361		
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Incorporation License: C-41137(496)/2000, issue No.12520, Date: August 28, 2000.</p> <p>Trade License: 04-42966, issued by Dhaka North City Corporation, Dhaka, Bangladesh, and Valid till June 30, 2022.</p> <p>Factory License: 11388/Dhaka, issued by Department of Inspection for Factories and Establishments, Valid till June 30, 2022.</p> <p>Fire License No: DD/Dhaka/16896/2002, issued by Bangladesh Fire Service & Civil Defense Authority, Valid till June 30, 2022.</p> <p>Boiler License No: BA BO 3077 issued by Office of the Chief Inspector of Boilers, Ministry of Industries, and Valid till July 01, 2022.</p> <p>EPB License No: BD04414, issued by Export Promotion Bureau Bangladesh, valid till June 30, 2022.</p> <p>Generation License No: Certificate no: LWC-1966 issued by Bangladesh Energy Regulatory Commission, Valid till December 31, 2022.</p> <p>BGMEA membership: Membership Reg no: 3705, Issued by Bangladesh Garment Manufacturers & Exporters Association (BGMEA).</p> <p>Group Insurance No: 20220742, issued by Bangladesh Garment Manufacturers and Exporters Association (BGMEA), valid till December 31, 2022.</p>		
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	<p>Sweaters garment manufacturing</p> <p>Production Process: Winding >Jacquard >Linking >Trimming > Mending > Washing > Sewing >Iron >Finishing>Packing</p>		
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Perfect Sweaters Ltd. is situated at 923, Shewrapara, Begum Rokeya Soroni, Mirpur, Dhaka-1216</p> <p>The total land area occupied was 5760.30 square feet, Total Production area was 41400 square feet and warehouse area is about 4000 square feet. The facility has operated in the existing location since November 01, 2016.</p>		

	<p>A total of 395 employees are currently working in the facility, which includes 305 production employees and 90 non-production employees. Around 97% workers are not a permanent resident of the factory location area but came from different regions on Bangladesh.</p> <p>All permanent workers are hired by the facility directly. The employees work 48 hour per week as regular working hour as prescribed by local law. Working days from Saturday to Thursday (8 hours/ Day) & Friday is weekly off day. The regular working hour is from 8:00 to 17:00 with 1 hour lunch break from 13:00 to 14:00. Night shift only jacquard sections from 20:00 to 5:00 with 1 hour break from 1:00 to 2:00.</p> <p>Employees' wages are calculated on monthly basis and paid within 7 working days of following month. The peak season in this facility is April to October. Facility having total 120000pcs/ month production capacity.</p> <p>Facility runs their factory in an 8 storied rented building which was found approved as commercial cum residential instead of industrial purpose.</p>		
	Production Building no: 01 (8 storied)	Description	Remark, if any
	Ground Floor	Generator Room, Transformer Room, & Boiler Room of the factory & rest of the area Shared with another business owner (Bata Show Room) for the use of commercial purpose.	Floor layout is approved by Department of Inspection for Factories and Establishments
	First Floor	Fully occupied by AB Bank under different management.	N/A
	Second Floor	Security Post area, Jacquard Section, Compressor Room & UPS Area.	Floor layout is approved by Department of Inspection for Factories and Establishments
	Third Floor	Jacquard Multi Guage Section, Sample Section, Store, Medical Room, Childcare, Inspection Room, Jacquard Distribution, Accessories store.	Floor layout is approved by Department of Inspection for Factories and Establishments

	Fourth Floor	Office, FQC, Packing, Metal Detector Room, PRE Inspection Room, PM Room, Director & Managing Director room	Floor layout is approved by Department of Inspection for Factories and Establishments
	Fifth Floor	Trimming, Mending, Sewing, Wash Section, Iron area, Chemical Room.	Floor layout is approved by Department of Inspection for Factories and Establishments
	Sixth Floor	Linking, Overlock, Linking Auto Super Section, Auto Placket section, Dining Area.	Floor layout is approved by Department of Inspection for Factories and Establishments
	Seventh Floor	Winding & Bonded Warehouse	Floor layout is approved by Department of Inspection for Factories and Establishments
	Roof Top	Canteen & rest of vacant.	N/A
	Is this a shared building?	Yes	Shared with Shop and Bank
	<p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: No crack was observed.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: Facility has structural engineering evaluation from Department of Inspection for Factories and Establishments and got approval from them.</p>		
G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider		

	<input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	April to October
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>Product category: Sweater</p> <p>Process: Winding >Jacquard >Linking >Trimming > Mending > Washing > Sewing >Iron >Finishing>Packing</p> <p>Production capacity: 120000pcs/Monthly</p> <p>Main Machineries: Flat Knitting Machine, Dial Linking Machine, Auto Placket Machine, Jacquard Knitting Machine (New), Jacquard Knitting Machine(Mul.), Loop Machine, Snap Button Machine, Flat Lock Machine, Over Lock Machine, Light Check, Plain Machine, Button Hole Machine, Button Stitching Machine, Bartake Machine, Winding Machine, Button Pull Test Machine, Tumbler Dryer, Automatic Washer, Hydro Extractor, Fulton Boiler (Steam), Steam Iron, Needle Detector Machine, Auto Packing Machine, Sub- Station Equipment's, Diesel Generator, Compressor, Online UPS, All Standard Furniture, Computer , Room Air Condition (Jacquard Floor), Ceiling Fan, Industrial Ex-Just Fan, PP belt Machine, Stand Fan, Various Machineries & Equipment Spare Parts.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details N/A

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 09:45 A2: Day 1 Time out: 18:50	A3: Day 2 Time in: N/A A4: Day 2 Time out: N/A	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A
B: Number of auditor days used:	2 Man-day (2 Auditors in 1 day)		

C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 3 weeks <input type="checkbox"/> Unannounced
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If No, why not? Facility management is not well aware about the requirement.
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause
G: Who signed and agreed CAPR (Name and job title)	Md. Sujon Sheikh- Manager (HR & Compliance)
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
I: Previous audit date:	January 14, 2021
J: Previous audit type:	Periodic
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Audit attendance	Management		Worker Representatives			
	Senior management		Worker Committee representatives		Union representatives	
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not Applicable					

E: If Union Representatives were not present please explain reasons why:
(only complete if no union reps present)

No union is formed in the factory. It is not mandatory by local law. Facility has formed Participation Committee, the worker representatives of the participatory committee may carry out the activities related to the interests of the workers in the manner prescribed by local law.

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – Male	181	00	00	00	00	00	00	181
Worker numbers – female	214	00	00	00	00	00	00	214
Total	395	00	00	00	00	00	00	395
Number of Workers interviewed – male	12	00	00	00	00	00	00	12
Number of Workers interviewed – female	14	00	00	00	00	00	00	14
Total – interviewed sample size	26	00	00	00	00	00	00	26



A: Nationality of Management	Bangladeshi	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2: _____ B3: Nationality 3: _____</p>	<p>Was the list completed during peak season? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods: April to October</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1: 100% C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____</p>	
D: Worker remuneration (management information)	<p>D: 00% workers on piece rate D1: 00% hourly paid workers D2: 100% salaried workers</p> <p>Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: 100% monthly paid D6: _____% other D7: If other, please give details</p>	



Worker Interview Summary	
A: Were workers aware of the audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Were workers aware of the code?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Number of group interviews: <i>(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)</i>	4 groups of 5 (20)
D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	D1: Male: 02 D2: Female: 04
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
H: What was the most common worker complaint?	No complain recorded.
I: What did the workers like the most about working at this site?	<ul style="list-style-type: none"> - Safe working condition - Can get leave in easy process - Wages are always paid in time - Management are co-operative
J: Any additional comment(s) regarding interviews:	Good behavior from Management.
K: Attitude of workers to hours worked:	Doing overtime is voluntary & worker can deny doing overtime if they don't wants.
L. Is there any worker survey information available?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, please give details: Facility has system in place to conduct satisfaction survey by their compliance team covering their complain, suggestions and improvement area. Auditor checked the survey report during the audit.	

M: Attitude of workers:

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

Auditor conducted confidential interviews with workers who were chosen freely without any influence by the factory management. 26 workers were randomly selected from different workshops for 06 individual & 20 group interviews. The workers' interviews were conducted at an independent room. The workers showed a cooperative attitude during the interview process. The effective evidences were collected by workers interview. Based on the workers interview, workers expressed their positive attitude to management and workplace. They agreed with the rules and management of the factory.

The information of interview was as below:

- Personal protective equipment (PPE) provided without cost.
- Worker gets pay slip before payment. They also get leaves as per local law. Eligible worker gets maternity leave as per the local law. Facility also assigns light work for the pregnant worker.
- No pregnancy test done before recruitment. Workers' designation & wages were paid based on their positions as per their contacts complying minimum wage gazette. All interviewees confirmed that no discrimination occurred in the factory.
- All interviewees confirmed that the factory checked their age proof records to verify their ages during recruitment. Minimum aged worker found 18 years
- The workers confirmed no "deposit" was required and their original documents such as ID cards were kept by themselves.
- Interviewees said they never be warned, fined or fired if they broke the factory rules. Only deduction for absent and government stamp charge have been done form the wages.
- Workers were satisfied with the working condition and the factory provided induction training for new workers.
- Workers full day off at Friday, Workers reported they work for 6 days per week, 8 hour per day. Overtime depend on production pressure. They had right to refuse overtime work.
- Wage payment done in cash and within 7 working days after completion of the wage month.
- Minimum wage provided to all worker. Overtime work hours paid at the rate of double of the basic wage. Overtime payment provided along with monthly salary.
- Workers confirmed no harsh or inhumane treatment occurred and the management was kind to all employees.
- Workers are not well aware about their legal rights & ETI base code
- Training provides on company policy in regular basis. H&S training also provided to existing and new workers.

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

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

Auditor conducted interview with 2 elected member of Participation Committee & found happy with the working condition & overall management system of the factory. Worker can share anything with the committee member & committee share with management in the regular meeting. Management is very cooperative resolving any demand from committee as well as from workers.

O: Attitude of managers:

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

Attitude of management was positive and cooperative during the audit. Md. Sujon Sheikh- Manager (HR & Compliance) is responsible for compliance with the code, legal requirements, development of policies, its Implementation, monitoring & control. In this backdrop, management had comprehensive knowledge about audit requirements and scope; e.g. ETI based code, local laws etc. Designated employee from different department including compliance executives, accounts personnel were present during audit & provided requested documents in timely manner. All necessary areas were allowed access during site visit. A private room was arranged for workers' interview and the management allowed audit team to select

workers for interviews. In the closing meeting, the management agreed with the non-compliances and stated that they would take corrective actions & consider it as development tool for their factory. No negative approach was noticed during entire process of the audit.

Audit Results by Clause

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Facility has policy to ensure human rights issues, and designated person to ensure the implementation of processes. Md. Sujon Sheikh- Manager (HR & Compliance) is responsible for their Universal rights covering UNGP responsibilities. Facility has provided access to a grievance system to enable the workforce to report to the company on Human Rights issues, without fear of reprisals towards the reporter. The terms and conditions for employees are stated in the employee handbook and workers are trained adequate in the grievance procedure.

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

Details: Documents review (i.e. review of company policy, procedures, internal audit report, grievance records, workers' handbook, training record), management interview and workers interview.

Any other comments: None.

<p>A: Policy statement that expresses commitment to respect human rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has policy to expresses commitment to respect human rights</p>
<p>B: Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Md. Sujon Sheikh Job title: Manager: - Manager (HR & Compliance)</p>
<p>C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Facility have access to a grievance system to enable the workforce to report to the company on Human Rights issues (grievances), without fear of reprisals towards the reporter. Training has been providing on regular basis to workers & policy has been posted in factory premises.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility maintains personal file for individual workers. All workers" information is kept there. Moreover, facility maintains software system for worker's wage and benefit.</p>

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

Good examples observed:

Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable
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Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2.5%	A2: This year: 2.5%
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1.1%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 1.05%	C2: This year: 1.05%
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.47%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Accident & injury records were available to review.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 1.2%	F2: This year: Number: 1.1%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	1.2%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 1%	H2: This year: 1.3%
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 00% workers	I2: 12 months 00% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 00% workers	J2: 12 months 00% workers

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

- Facility has a social compliance policy and written procedures which meet the Code and International Labour Standards.
- Facility has policies and procedures which ensure the site meets freedom of association, discrimination and general human rights standards.
- Facility has system in place to update and amend policies, procedures and practices on regular basis.
- Md. Sujon Sheikh- Manager (HR & Compliance) is responsible for compliance with the code.
- All types of legal document were found valid and from appropriate authority to run the business.
- Facility has system in place to communicate their policy & ETI code to all their workers & management. ETI base code was found posted in the different places in the factory.
- Interviewed workers were found not aware about ETI code & their legal right & responsibilities.
- Facility has internal audit team to monitor their regular compliance status as well as to their suppliers.

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

Details:

- Social Compliance Management system manual & Social Policies
- Personal file & job responsibility of Compliance manager responsible for ETI code implementation.
- Legal documents e.g. licenses, permissions, certificates etc. All legal permission & licenses were found valid.
- Internal audit documents.
- Training on ETI base code/ Ethical code to Mid-level Management.
- Training on ETI base code/ Ethical code to workers.
- Training records and meeting minute's records.
- Management review meeting
- Commitment of suppliers
- Employees Handbook
- Management and worker Interview

Any other comments: None

Management Systems:

<p>A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: Auditors checked this through internet and no fines/prosecutions was noted.</p>
<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Relevant Policies including forced labour, child labour, Health and Safety, Living Wage, Working Hours, No Discrimination, No harsh treatment etc. were available to review.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Relevant Policies are being posted and communicated by training. Interviewed workers were found aware about the company policy on forced labour, child labour, Health and Safety, Living Wage, Working Hours, No Discrimination, No harsh treatment etc.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Training record was found manager are aware on forced labour, child labour, discrimination, harassment & abuse on ethical code.</p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Managers and workers have received training on ethical code standards for forced labour, child labour, discrimination, risk assessment, anti-corruption and factory preserved training records as evidence. Training date on management January 26, 2022. Participant number 11. Inadequate training provided to workers on ethical code.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility also undergo BSCI audit scheme, having C (Acceptable) rating in last audit conducted on January 27, 2021.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Md. Sujon Sheikh-Manager (HR & Compliance) is responsible for Human Resource Department.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

	H1: Please give details: Md. Sujon Sheikh-Manager (HR & Compliance) is responsible for Human Resource Code.
I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility has documented policy to ensure all worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility maintains personal file for individual workers. All workers' information is kept there confidentially. Moreover, facility maintains software system for workers' wage and benefit.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility has conducted risk assessment to evaluate policy and procedure effectiveness. Facility also does internal audit to check the effectiveness of their policy & procedures.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Risk assessments were conducted by management, and outputs were reviewed by management to establish steps to remove avoid or mitigate any risks identified.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The facility communicated the ETI code to its own suppliers.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Facility has valid agreement of rent the building from building owner. All legal permission from government authority including construction approval, lay out plan were reviewed & found that the factory building was given permission for commercial cum residential use by governmental department.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	O1: Please give details: Facility has their legal advisor who are responsible to conduct legal due diligence.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No P1: If yes, how does the company obtain FPIC:
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: Facility has valid agreement of rent the building from building owner & the owner purchased the property according to legal channels, overseen by company legal advisors.
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No R1: Please give details: The factory building was given permission for commercial cum residential use by governmental department. Details are given in NC.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: Per document review & management interview the building was given permission by government department for commercial cum residential use. Details are given in NC.

Non-compliance:

<p>1. Description of non-conformance: <input checked="" type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: The facility has not provided adequate training on ethical codes to its workers. Around 60% of interviewed workers were found not aware of social standards & their legal rights.</p> <p>Local law and/or ETI requirement: Additional Elements: 0.B.4 Suppliers are expected to communicate this Code to all employees.</p> <p>Recommended corrective action: The facility should provide required training to all its workers.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>1. Document review, worker & management interview</p>
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Observation:	
<p>Description of observation: 1. Facility management has not completed the SAQ at the time of audit.</p> <p>Local law or ETI requirement: Not Applicable</p> <p>Comments: Facility is not well aware of this requirement.</p>	<p>Objective evidence observed: Document Review & Management Interview</p>

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

1: Freely Chosen Employment

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Company has a strict policy against involuntary or forced labour indentured, bonded or otherwise; it does not support the use of forced labour in any form including bonded or compulsory prison labour. The management of facility prohibits all relevant individual from coercing employees in any way, or unnecessary limiting employee's freedom of movement. Company selects the workforce directly. HR officer of company frequently interview the workers if they have any problem with supervisor or other managerial staff.

The company has its own 10 security staffs. Which are performing their duties in 03 shifts to take care of facility security. The security services are only to provide security measures and protection of the facility and to the company personnel.

Workers file review and workers interview indicated that management or agent did not retain original identification papers of workers. Md. Sujon Sheikh- Manager (HR & Compliance) ensure that original documents are only required from the employees for the verification of photocopies of documents, the same photocopies are kept in office record under employees file.

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

Details:

- Social Compliance Management system manual.
- Checked personnel files of the workers, contracts, appointment letters, terms and conditions.
- Attendance records
- Hiring Contracts
- Job description of Security Guards
- Worker & Management interview

Any other comments: None.

<p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p>
<p>B: Is there any evidence of a loan scheme in operation</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

	B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding:
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has written policy & procedure to mitigate the risk of forced/ trafficked or bonded labour in their supply chain.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding:

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

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

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

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

Company recognizes and respects the rights of employees to exercise their lawful rights of free association and collective bargaining. The facility does not discriminate against employees who form or participate in lawful association. There is neither registered trade union in that area and nor workers entered into any collective bargaining agreement with management of the company however, Workers of the facility are free to form any association/ committee to address the worker problems and demands. If any permanent employee choose to form any association they can form it by using legal procedure and can register it.

- Facility constitutes a Participation Committee (PC) as parallel meaning of workers' committee; consist of the representatives of the employer and the workers through election process.
- The committee members were chosen by fellow workers through election procedure.
- Worker interview confirmed that the members of the worker's committee had been elected by fellow workers.
- The participation committee meet once in every 2 (two) months to discuss and exchange views and recommend measures for performance of the functions as prescribed in local law.
- All copies of reports and minutes of meetings of participating committee sent to Director of Labour as prescribed in local law. Meeting Minutes were reviewed by auditor.
- Workers know who their representatives are & also aware about their activities.
- Committee representatives are well aware about their responsibilities & duties regarding their committee.

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

Details:

- Site policy on freedom of association
- Formation details of Participation Committee (PC) election.
- Interview with workers
- Interview with committee members
- Interview with managers
- Posted pictures of Participation Committee (PC) representatives
- Training records.

Any other comments: None.

<p>A: What form of worker representation/union is there on site?</p>	<input type="checkbox"/> Union (name) <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other (Participation Committee) <input type="checkbox"/> None	
<p>B: Is it a legal requirement to have a union?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>C: Is it a legal requirement to have a worker's committee?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p>D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>D1: Please give details: The factory management has provided complaint box in the toilet area through which workers can raise their suggestion / complaints. Workers can also approach the management directly for any grievances which confirmed by the interviewed workers. Workers can also share their complaints or suggestion with the Workers committee member and then workers committee member express it to the management on their meeting or other way.</p> <p>D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>E1: Please give details: Facility allows the workers welfare association to conduct their activity freely. Meeting held on regular basis.</p>	
<p>F: Name of union and union representative, if applicable:</p>	<p>This is a nonunionized factory.</p>	<p>F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A</p>
<p>G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?</p>	<p>Facility has a parallel meaning of Workers participation committee through election process. Vice president of PC committee member was present at opening meeting of the audit.</p>	<p>G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>H: Are all workers aware of who their representatives are?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Interviewed workers were found aware of whom their representatives are.</p>
<p>I: Were worker representatives freely elected?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Date of last election: January 15, 2022</p>

J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 2 representatives were interviewed.	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Committee meeting held on regular basis. Meeting minutes recorded and action taken. Last Meeting date: January 19, 2022. Agendas of last Meeting <ul style="list-style-type: none"> - Health & safety - Company COC - Miscellaneous 	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: ___% workers covered by Union CBA N/A	M2: ___% workers covered by worker rep CBA N/A
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A	

Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed</p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

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

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

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

It was verified during the audit that facility has the appropriate Health & Safety Management System, the company has established procedures for Health & Safety and provides safe working environment for all its workers and to eliminate all potential hazards that can cause work related accidents. The facility has systematized mechanism to detect potential risk and hazards associated with the job or present in the work environment which could cause harm/ injury to the workers.

Md. Sujon Sheikh- Manager (HR & Compliance) is responsible for communicating, deploying and monitoring Health & Safety policies and practices and ensures compliance to the legal requirements.

General Health and Safety management

- Posters on safety and occupational health issues were also found displayed near the working areas to disseminate information on health and safety related issues.
- Workers are aware of the actions to be taken during emergency situations.
- One registered doctor & nurse is appointed subjects to all employees' pre-medical examination. The pre-medical examination includes general health check-up, check for any communicable diseases amongst the workers before joining including verification of age. Medical certificates of workers were checked at random from all levels of workers in the company and were found to be in order.
- There were adequate first aid kits in each production area and they were well stocked.
- Facility has valid medical contract as per local law with medical centre named Al Helal Specialized Hospital Ltd.
- Here were 20 first aid responder who are responsible for 10 boxes and when a selection was interviewed, they confirmed that they had been trained by the factory doctors. These first aiders were identified by their dress prescribed by local law.
- Potable water was freely available in all areas and test certificates were up-to-date.
- Sufficient clean toilets segregated by gender were available at all the time to workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Monthly meetings minutes between the H&S committee (workers) and the H&S manager, and each point was acted on.

Fire Safety

- There were at least 2 exits for most work areas and most of the exits were clearly marked
- Fire-fighting equipment was adequate and checks were up-to-date no of staircase 02, no of emergency staircase 01, no of water hose pipe 06, no of ABC extinguisher 57, no of smoke detector 104, no of CO2 extinguisher 34, no of emergency light 41, no of fire door 04, no of fire alarm 20.
- Evacuation plan were posted in all areas and understood by all workers interviewed
- Internal evacuation drills are held monthly in which every employee take part. Total number of fire fighting team 57. Fire fighter 16, rescuer 16, first aid responder 25.
- Training had been given by the local fire department & internally.

Electrical safety

- All electrical equipment was in good condition such as sockets, plugs, switches and main fuse boards.
- There were competent electricians at the site and their training certificates were available for review.

Chemical safety

- Facility use only spot lifter for spot lifting activities.
- All chemicals were correctly labelled.
- Material Safety Data Sheets were available.

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

Details:

- Legal license, permissions & certificates.
- Health and safety policy & procedure
- Training registers.
- Accident & injury records
- Internal inspection report
- External inspection reports
- Electrical inspection report
- Fire equipment maintenance records
- Test report of air quality and noise level.
- Heavy equipment maintenance records including boiler, generator, and electrical maintenance.
- Potable water testing certificate. Last Testing Date: March 09, 2021, from Department of Public health Engineering.
- First aid responder lists & their training record. Last date of first aid training: January 05, 2022. Participant's number: 07.
- Evacuation drill conducted on October 27, 2021, Participate number 343.
- Internal fire fighting training conducted on January 23, 2022, Participant number 21.
- Fire drill from Fire Service and Civil Defense authority on January 10, 2022. Participant number 239.
- Fire training from Fire Service and Civil Defense authority on January 08-09, 2022. Participant number 40.
- Health and safety committee & meeting minutes. Formation Date of Committee: January 20, 2022. Last date of meeting: January 20, 2022. Participant's number: 06.
- Health and safety training. Last training date December 28, 2021. Participant's number: 20.
- Personal protective equipment training, Last training date: January 04, 2022. Participant's number: 22.
- Interviews with H&S manager
- Interviews with workers and H&S committee members

Any other comments: None

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Facility has established Health & Safety policies and procedures that are fit for purpose and these are communicated to workers through training. Health & Safety last training held on December 28, 2021. Participant number was 20.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Facility has included Health & Safety policy in worker's manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: No additional structure was found in the facility without permission.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are informed on H&S policies and provided with personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Facility has a medical room which comply the legal requirement. Adequate personnel, medical equipment were provided. Minimum two beds were ensured as prescribed by local law.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Doctors' Name: Dr. Umme Salma Siddika Nurse Name: Mst. Taslima Khatun</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: Not Applicable as facility does not provide transport facility for the workers.</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: No living space has provided by the facility and it is not legal requirement.</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility conducted their H&S risk assessment by their compliance team. The factory management has conducted internal audits to find out the health and safety risks of the production floor. As well as the factory management has analysed the risk for related sections and taken control measure to reduce the risk. Last internal audit Date: December 27, 2021.</p>

<p>J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility has their own environmental policy complying the legal requirements, also has system in place to implement.</p>
<p>K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility does not use any banned chemical.</p>

Non-compliance:

1. Description of non-compliance:

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

Facility runs their factory in 8 storied building which was found approved as commercial cum residential building instead of using industrial purpose.

Local law and/or ETI requirement

Building Construction Act-1952, Section-3 (1).

Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alteration to any building, or excavate or re-excavate any tank 6

*** within, the area to which this Act applies; and such sanction shall be subject to such terms and conditions as the Authorized Officer may think fit to impose

ETI requirement 3.1

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

Recommended corrective action:

Facility should have permission for the industrial use of the building from concerned authorities.

2. Description of non-compliance:

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

Facility runs their production on 8 storied building but no lift has been provided as prescribed by local law.

Local law and/or ETI requirement:

Bangladesh national Building Code, Chapter 5, 5.2.1.1

Lifts shall be provided in buildings more than six storeys or 20 m in height.

ETI requirement 3.1

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

Objective evidence observed:

(where relevant please add photo numbers)

1. Document Review & Management Interview
2. Floor Visit & Management Interview, Document interview.

as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

Facility should ensure lift facility as per local law.

3. Description of non-compliance:

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

Ergonomic support has not given to employees adequately to their job. Back support of sitting chairs for the workers has not been provided.

Local law and/or ETI requirement:

Bangladesh Labor Rules 2015, Schedule 4(2), B (1)

Functions and responsibilities of the safety committee: Following matters shall be included in the guideline prepared under clause (a), Namely.1. Risk and safety related management of the firm:

- (a) Identifying risky areas (like parts of building, stairs, premises, electric lines, machinery, etc) ;
- (b) Nature of risk (like crack, gate locked during working hours, dangerous electric connection, etc) ;
- (c) Risk level (like high/medium/general/not satisfactory);
- (d) Assessment of immediate duties (like prohibition of use, immediate repair, reforms, closure);
- (e) Assessment of necessary protection system in different nature and levels of risk; and
- (f) Assessment of technical and administrative liability.

ETI requirement 3.1

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

Recommended corrective action:

Facility should provide sitting chair to all their workers ensuring the back support.

4. Description of non-compliance:

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

Facility has not provided any training on machine operating procedure training of dryer machines. Noted through interview, dryer machine operators are not well aware about the operating procedure & warnings of dryer machines.

Local law and/or ETI requirement:

Local Law: Bangladesh Labor Act 2006, section 79 (e)

Dangerous operation. Where the Government is satisfied that any operation carried on in an establishment exposes any person employed in it to a serious risk of bodily injury, poisoning or disease, it may, by rules, make the following provisions for such establishment, namely:

- (e) to give notice of any corrosive chemicals and of precautions to be taken in their use.

3. Floor Visit & worker interview (NC picture no: 01)

4. Floor Visit, worker interview & Document review.

<p><u>ETI requirement 3.1</u> 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.</p> <p>Recommended corrective action: Facility should provide adequate training on machine operating procedure training of dryer machines.</p>	
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Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

4: Child Labour Shall Not Be Used

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

The facility has the written policy & procedure to ensure no recruitment of child labour. The factory complies with the local law in their recruitment process as instructed "If any question arises as to whether any person is a child or an adolescent it shall be resolved on the basis of birth registration certificate or school certificate or a certificate issued by a registered medical practitioner certifying the age of the concerned person" After joining original ID's were returned and only copies kept on file. Youngest worker was 18 years old. Facility has precise policy on young workers' job responsibility & working hour as required by local law & scheme requirements.

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

Details:

- Employment contract
- Recruitment notices
- Policy on child labour and remediation
- 26 workers personal files for a valid age proof document

Any other comments: None

A: Legal age of employment:	14 years old
B: Age of youngest worker found:	18 years old
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0%
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

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

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

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

5: Living Wages are Paid

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

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

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Records were checked on sample basis of male, female workers from both divisions, which also include production workers, packers, loader, supervisor, peon, security guards, checkers, and machine operators etc. the records were verified and found satisfactory.

- Payment record was checked from January 2021 to December 2021.
- The lowest wage paid as per the legal minimum compensation, that the wages were equivalent to the legally prescribed minimum wages i.e. BDT 8000/-. This was done through review of time records and wages record at account office.
- Wages are paid in cash & ensure within 7 working days.
- Proof of wage disbursement is evidenced through the wage record and wage slips. A copy of the wage slip is given to the worker, who has to sign on the wage register and the wage slip.
- The payroll slip includes details on employee name, wages paid and deduction details including signatures of employee and employer representative.
- Facility provides all other benefits prescribed by local law including maternity benefit, service benefit, payment against unspent annual leave etc.
- Facility provides overtime payment respecting the local law.
- During the interview, it was verified that all workers were aware of the wages they were entitled and also whether they were comfortable with the mode of payment.
- Awareness on the deduction on wages was also very good amongst the workers.

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

Details:

- Payroll and Payment records of 26 workers were checked for last 12 months.
- Group Insurance
- Attendance Record
- Pay slips for last 12 months
- Production record.
- Full and final settlements records
- Earned leave benefit records
- Worker interview

- Management interview.
Any other comments: None

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

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

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

Summary Information

Criteria	Local Law <i>(Please state legal requirement)</i>	Actual at the Site <i>(Record site results against the law)</i>	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i>	Legal maximum: 8 hour/day, 48 hour / Week, 208 hour/month	A1: 8 hour/day, 48 hour / Week, 208 hour/month	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i>	Legal maximum: 2 hour/day, 12 hour/week, 52 or 54 hour/month	B1: 02 hour/day, 12 hour/week, 52 hour/month	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 8000 BDT/ Per month	C1: 8000 BDT/ Per month	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i>	Legal minimum: 200% of basic salary/ Per hour 39.42 BDT/ Per hour for minimum grade worker	D1: 200% of basic salary/ Per hour 39.42 BDT/ Per hour for minimum grade worker	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No															
A1: If No , why not?	N/A															
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	26 samples from January 2021 (Random month) 26 samples from June 2021 (Peak month) 26 samples from December 2021 (Current month)															
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>C1: If Yes, please give details:</p> <p>The Minimum Wage Gazette Notification for the workers of the Garments Industries in Bangladesh has been published on December, 2018 for the implementation of the new pay structure. Later on at 24th January, 2019, government revised the structure defining different legal minimum wage grade.</p> <p>There are two separate pay structures; one for the garment workers and another for the employees.</p> <p>(Schedule A) For the Workers:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Grades</th> <th>Basic wage (BDT)</th> <th>House rent (50% basic) (BDT)</th> <th>Meal (BDT)</th> <th>Medical (BDT)</th> <th>Travel (BDT)</th> <th>Gross monthly wage (BDT)</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>10938</td> <td>5469</td> <td>900</td> <td>600</td> <td>350</td> <td>18257</td> </tr> </tbody> </table>	Grades	Basic wage (BDT)	House rent (50% basic) (BDT)	Meal (BDT)	Medical (BDT)	Travel (BDT)	Gross monthly wage (BDT)	Grade 1	10938	5469	900	600	350	18257
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<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>	<p>D1: If No, please give details:</p>																																																																																											
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BDT 8000/ Month</p>																																																																																											
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: 00% of workforce earning under minimum wage F2: 10% of workforce earning minimum wage F3: 90% of workforce earning above minimum wage</p> <p>As per minimum wage gazette: Basic: BDT4100, House rent: BDT2050, Medical: BDT600, Conveyance: BDT350, Food: BDT 900 Total=BDT8000.</p>																																																																																												
<p>G: Bonus Scheme found:</p>	<p>Bonus Scheme found:</p>																																																																																												

<p>Please specify details:</p>	<p>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</p> <ol style="list-style-type: none"> Facility has system in place to provide festival bonus to all eligible worker 2 times yearly as prescribed by local law. Facility also have attendance bonus scheme BDT 400 for all workers. 		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>-Unauthorized absence deduction -Revenue stamp</p>		
<p>I: Have these deductions been made?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>I1: Please list all deductions that have been made.</p>	<p>1. Absent deduction 2. Revenue stamp deduction</p> <p>Please describe: Absent deduction is made from workers basic salary and BDT 10 is Deducted as stamp deduction from workers gross salary which are as per law.</p>
		<p>I2: Please list all deductions that have not been made.</p>	<p>1. N/A</p> <p>Please describe: N/A</p>
<p>J: Were appropriate records available to verify hours of work and wages?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>		
<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>K1: Type</p> <p><input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:</p>	
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>L1: Please give details: Any work other than regular work is treated as overtime.</p>		
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>M1: Please specify amount/time:</p>		

and Measurement Criteria.	
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Yearly minimum 5% increase of wage as prescribed in local law.
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through factory rules review, payroll records review and employee's interview, it was confirmed that equal rates were being paid for equal work.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Facility has effective written policy & procedure on working hour. Working hour for the sample workers were checked from January 2021 till the audit date.

- Workers worked 8 hours per day, 6 days per week as normal working hours, the maximum working hour per week was 48 hours.
- Overtime is voluntary and workers are willingly doing overtime as per law.
- All overtime is compensated as per law.
- Facility's general working hour is from 8:00 to 17:00 including 1 hour lunch break from 13:00 to 14:00. Night shift only jacquard sections from 20:00 to 5:00 with 1 hour break from 1:00 to 2:00.
- Factory provides weekly holiday on Friday as declared.
- No unauthorized deduction made by the management.
- Electronic attendance system was used to record time in and time out information for each employee.
- Through employees' interview, overtime was voluntary.

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

Details:

- Company Policy on working hour
- Time cards of sampled workers.
- Attendance register
- Complain register
- Production records
- Workers’ pay slip
- Production capacity plan

Any other comments: None.

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

Observation:

Description of observation:

None Observed

Local law or ETI requirement:

Not Applicable

Comments:

Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

None Observed

Objective Evidence Observed:

Not Applicable

Working hours’ analysis

Please include time e.g. hour/week/month

<i>(Go back to Key information)</i>		
Systems & Processes		
A. What timekeeping systems are used: time card etc.	Describe: Factory uses electronic time keeping system.	
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details	
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:
		<input type="checkbox"/> 0 hrs <input type="checkbox"/> Part time <input type="checkbox"/> Variable hrs <input type="checkbox"/> Other
		If "Other", Please define:
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details:
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	6 days	
Standard/Contracted Hours worked		
	<input type="checkbox"/> Yes	G1: If yes, % of workers & frequency:

G: Were standard working hours over 48 hours per week found?	<input checked="" type="checkbox"/> No	
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details:
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: January 2021: 2 hours per day, 12 hours per week, 52 hours per month June 2021: 2 hours per day, 12 hours per week, 50 hours per month December 2021: 2 hours per day, 12 hours per week, 50 hours per month	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	4%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: As per labor contract, payroll records and workers interview, it was noted that overtime is voluntary
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: Workers are getting 200% of their basic wage for overtime work.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: 100% workers are getting overtime payment at a premium rate of 200% of their basic wage for overtime work in every month
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other	

<p>complete the boxes where relevant.</p>	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>Overtime calculated 200 % of Basic wages as prescribed by local law.</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> Overtime is voluntary</p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>N/A</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Q1: If yes, please give details:</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal, and retirement found.
- Complaints / Suggestions boxes were installed at different places for identification of any kind of discrimination.
- The factory provides the same pay to male/female employees.
- No complaint or records found for pregnancy test.

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

Details:

- Appointment Letter
- Confirmation Letter
- Contract Agreement
- Policy on Discrimination
- Complain register
- Personal file
- Termination records
- Payrolls
- Training records

Any other comments: None

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 97% A2: Female: 03%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	1 Factory doctor & 1 nurse is female
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found

	C1: Please give details: Facility has written policy & system in place to prevent any form of discrimination.
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Professional Development

A: What type of training and development are available for workers?	All workers Were given H&S training. Females as well as males were trained to become supervisors and quality auditor.
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B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
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Non-compliance:	
<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i></p> <p>Not Applicable</p>

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

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

8: Regular Employment Is Provided

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

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

ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

- All permanent workers were recruited by the factory directly.
- The company provides regular employments and does not practice the way of home-workers.
- Based from document review it was found that in workers file, both parties (workers and company) signed the employment contract and each party keeps copy of it.
- At the time of induction an employment contract is signed by both of parties which state all term & conditions of employment. The employees' files contain objective evidence relating to the age of the workers, the same were checked and it was verified that people had more than required age when they were employed.

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

Details:

- The hiring and termination practices
- Appointment Letter
- Confirmation Letter
- Contract Agreement
- Personal files
- Payroll records

Any other comments: None

Non-compliance:

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

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

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

All Workers	
<p>A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?</p>	<p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p>
<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p>

C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details:
D: If any checked, give details:	N/A

Migrant Workers:	
<i>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</i>	
A: Type of work undertaken by migrant workers:	No migrant worker works in the factory.
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: 0
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A C2: Observations: N/A
D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If yes, number and example of roles: N/A

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable)	
<i>(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)</i>	
A: Number of agencies used (average):	A1: Names if available: 0
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: N/A

<p>E: Does the site have a system for checking labour standards of agencies? If yes, please give details.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: N/A</p>
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Contractors:
Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,

<p>A: Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>A1: If yes, how many contractors are present, please give details:</p>
<p>B: If Yes, how many workers supplied by contractors?</p>	<p>N/A</p>
<p>C: Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: N/A</p>
<p>D: If Yes, please give evidence for contractor workers being paid per law:</p>	<p>N/A</p>

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

A site tour showed that all production processes were present in the unit. It was verified through document review, factory tour, management interview and employee interview that No Sub-contractor has engaged by the facility.

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

Details:

- Site tour (Calculation on total production and estimated capacity)
- Materials in/out records
- Management interview
- Worker interview

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

None Observed

Local law and/or ETI /Additional Elements requirement:

Not Applicable

Recommended corrective action:

Not Applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

Observation:

<p>Description of observation: None Observed</p> <p>Local law or ETI/Additional elements requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>
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Good Examples observed:	
<p>Description of Good Example (GE): None Observed</p>	<p>Objective Evidence Observed: Not Applicable</p>

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x	
<p>A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:</p>
<p>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes, summarise details:</p>
<p>C: Number of sub-contractors/agents used:</p>	
<p>D: Is there a site policy on sub-contracting?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes, summarise details:</p>
<p>E: What checks are in place to ensure no child labour is being used and work is safe?</p>	

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
<p>A: If homeworking is being used, is there evidence this has been agreed with the main client?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes, summarise details:</p>		
<p>B: Number of homeworkers</p>	B1: Male:	B2: Female:	Total:
<p>C: Are homeworkers employed direct or through agents?</p>	<p><input type="checkbox"/> Directly <input type="checkbox"/> Through Agents</p>		C1: If through agents, number of agents:

D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
E: How does the site ensure worker hours and pay meet local laws for homeworkers?		
F: What processes are carried out by homeworkers?		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:	
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

<p>A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: participation committee available to the workers for reporting any violations of Labour standards and H&S or any other grievances. Suggestion boxes were found available in the workers' toilet area so that worker can put their grievance / suggestion in confidential manner. Facility also has system in place to get any suggestion or grievance through workers' representatives.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>Workers were found adequately not aware on grievance procedure of the factory.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>Suggestion boxes were found available in the workers' toilet area so that worker can put their grievance / suggestion in confidential manner. Facility also has system in place to get any suggestion or grievance through workers' representatives.</p>
<p>D: Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: There was a box system inside & outside of the factory monitored by relevant trained compliance team.</p>
<p>E: Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p>
<p>F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p>
<p>G: Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p>

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

Current Systems and Evidence Examined

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

Current systems:

- Facility has written policy on no harsh or inhumane treatment.
- Facility has a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the facility had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- There was an internal process for grievance, where workers could report any grievances (harassment, bullying, discrimination etc.); any received complaint would be handled by management, without any reprisal for the worker in question.

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

Details:

- Disciplinary and grievance procedure
- Complaint records
- Employment Contracts
- Disciplinary Policy
- Personal files
- Training Record.

Any other comments: None

Non-compliance:	
<p>1. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: The facility has a harassment committee but gaps were identified in the below area:</p> <ol style="list-style-type: none"> a. Head of the complaint committee should be women per local requirement but the factory has not considered & existing committee's head found a male. b. The Complaint Committee should have at least two members from outside the organization concerned, preferably from organizations working on gender issues and sexual abuse requirements but the factory has not considered the requirement. <p>Moreover, the factory's mid-level management including the supervisor & in charge has not gotten adequate training on harassment & abuse.</p> <p>Local law and/or ETI requirement: <u>In the Supreme Court of Bangladesh High Court Division (Special Original Jurisdiction) Writ Petition No. 5916 of 2008.</u> http://www.supremecourt.gov.bd/resources/documents/276907_Writ_Petition_5916_08.pdf</p> <p><u>Additional Elements 9.3</u> Policies and procedures are communicated and understood by all levels of personnel e.g. using posters, training, worker handbook, other means when literacy is low.</p> <p>Recommended corrective action: Facility should form a harassment committee as per law & give training to their supervisor & line chief.</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>1. Document review & Management interview</p>

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

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

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

- Per document review, factory management representation and worker interview, all workers in the factory were from Bangladesh and 100% were local workers. All workers had the proper legal rights to work in this region. The youngest age was 18 years old. All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes.
- All the employees were kept ID or birth certificate copies and photo in the personnel file.
- All the employees have signed the labour contract, they can obtain pay slip before they took wage, payrolls were provided for audit, and manual time card lists were kept.
- The factory recruit new worker only through posting recruiting advertisement on newspaper, some of production employees were introduced by fellow-villager, the workers have not paid any deposit when they were recruit in the factory.
- There were not any deductions for items such as travel and equipment.

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

Details:

- Hiring procedure
- Personnel files
- Worker handbook
- Worker interview
- Management interview

Any other comments: None

Non-compliance:

<p>1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed</p> <p>Local law and/or ETI /Additional Elements requirement: Not Applicable</p> <p>Recommended corrective action: Not Applicable</p>	<p>Objective evidence observed: (where relevant please add photo numbers)</p> <p>Not Applicable</p>
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Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI/Additional Elements requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed:</p> <p>Not Applicable</p>

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

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

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

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

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

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

Current Systems and Evidence Examined

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

Current systems:

- Facility has conducted Environmental test (Noise, Light, Temperature test) through a third party.
- The annual monitoring reports for air emission and boundary noise were provided for review, and the results were within the restriction per environmental law.
- Based on worker's interview, they were trained on environmental protection.

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

Details:

- Environmental policy
- Energy bills
- Water bill
- Management & worker interview

Any other comments: None

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements NC against Local Law
 Facility has no environmental Clearance Certificate of the factory. Note that facility applied for the certificate on February 12, 2020 but yet to get the license form department of Environment.

Local law and/or ETI/Additional Elements requirement:

Bangladesh Environment Conservation (Amendment) Act, 2010, section-12 (5)
 Department shall renew the list of previous years enlisted industry or project for giving environmental clearance certificate and define the minimum quality or responsibility of related person or organization with compilation of environmental impact assessment report or environmental management plan of different industry or project and prepare such list, approve and renew.

Additional Element: 10B2.1

Objective evidence observed:

(where relevant please add photo numbers)

1. Document Review & Management Interview

<p>Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>Recommended corrective action: Facility should have Environmental Clearance Certificate from concern authority.</p>	
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Observation:	
<p>Description of observation: None Observed</p> <p>Local law or ETI/additional elements requirement: Not Applicable</p> <p>Comments: Not Applicable</p>	<p>Objective evidence observed: Not Applicable</p>

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

Other findings

Other Findings Outside the Scope of the Code
Nil

Nil

Community Benefits
<i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
Nil

Nil

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

Not Applicable please x

Photo Form

NC Pictures

	<p>Void</p>	<p>Void</p>
<p>NC Picture no 01: Ergonomic back support of sitting chair have not ensured.</p>	<p>Void</p>	<p>Void</p>

General Images

<p>Factory Name</p>	<p>Factory front side road</p>	<p>Factory entrance</p>
<p>Production building overview</p>	<p>Auditor's picture in front of factory gate</p>	<p>Roof top of factory</p>

<p>Sample section</p>	<p>Winding section</p>	<p>Winding section</p>
<p>Jacquard section</p>	<p>Jacquard section</p>	<p>Inspection area</p>
<p>Linking section</p>	<p>Linking section</p>	<p>Trimming section</p>
<p>Trimming section</p>	<p>Mending section</p>	<p>Mending section</p>

		
<p>Sewing section</p>	<p>Pressing section</p>	<p>Pressing section</p>
		
<p>Washing section</p>	<p>Washing section</p>	<p>Eye wash station in wash area</p>
		
<p>Get up check area</p>	<p>Packing area</p>	<p>Packing area</p>
		
<p>Finished goods area</p>	<p>Warehouse area</p>	<p>Accessories store</p>

		
<p>Evacuation plan</p>	<p>Extinguisher</p>	<p>Extinguisher</p>
		
<p>Automated extinguisher</p>	<p>Fire equipment</p>	<p>Fire alarm call point</p>
		
<p>Fire alarm</p>	<p>Smoke detector</p>	<p>PA (Public Addressable) system</p>
		
<p>Hose reel</p>	<p>Fog light</p>	<p>Emergency light</p>



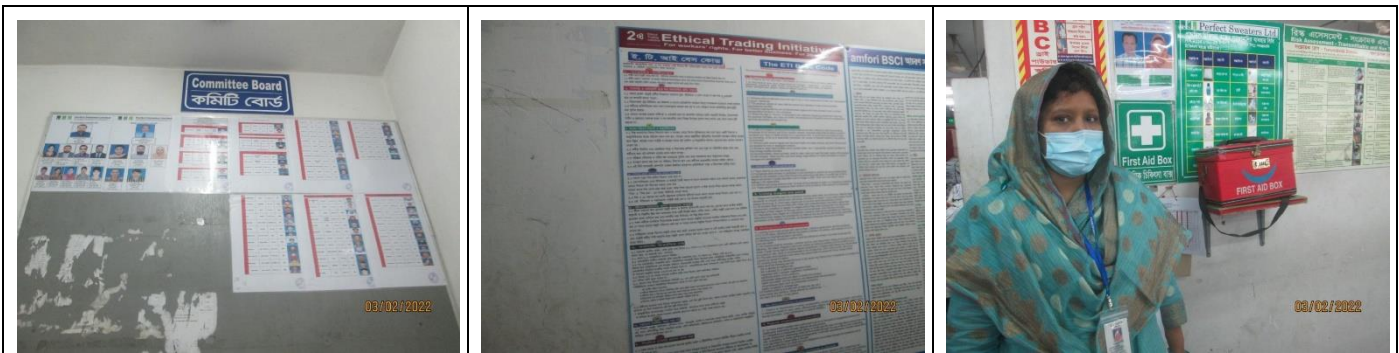
Aisle mark on floor Exit sign Fire door



Staircase Bare window Fire hose check by fire fighter



Policy board Posted maternity risk assessment Posted Company COC



Posted committee board Posted ETL base code First aid responder with first aid box

<p>Medical room</p>	<p>Child care room</p>	<p>Factory canteen</p>
<p>Workers dining area</p>	<p>Drinking water facility</p>	<p>Worker's toilet area</p>
<p>Wudu place in toilet area</p>	<p>Grievance box in toilet area</p>	<p>Factory boiler</p>
<p>Factory Generator</p>	<p>Electric sub-station</p>	<p>Electric distribution board</p>



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

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

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

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

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d)

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