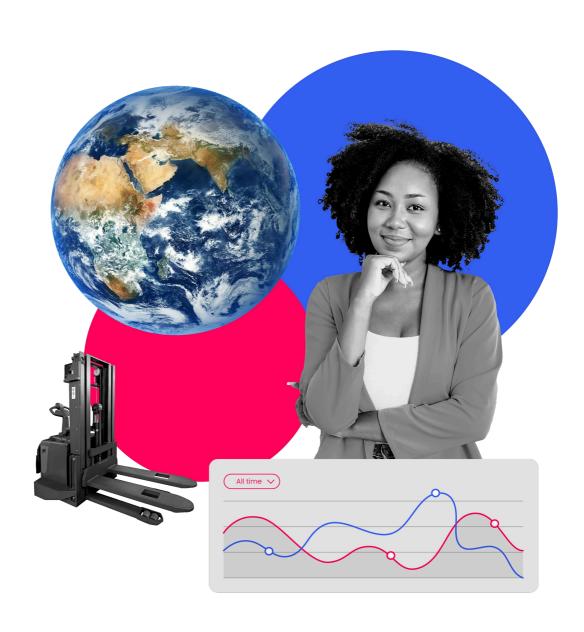


# Sedex Members Ethical Trade Audit Report

Version 7





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8. Regular employment is provided
8.A. Sub-contracting and homeworkers are used responsibly



9. No harsh or inhumane treatment is allowed

10.A. Environment 2-Pillar

**Attachments** 



#### **Audit content**

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

#### 2-pillar audits include:

- · Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - · 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

#### 4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- · Business ethics:
  - 10.C. Business ethics
- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

<u>← Contents</u> <u>Findings →</u>



# **Audit details**

#### Site details

Sedex site reference	ZS286418855	Site name	Perfect Sweaters Limited
Business name	Perfect Sweaters Limited	Site address	1216 923, Shewrapara, Begum Rokeya saroni Mirpur, Dhaka, BD

#### **Audit details**

Sedex company reference	ZC280188	3619	Auditor company name	Intertek Bangladesh
Date of audit	2025-06-1	18	Audit conducted by	Amin Sharif
Audit pillars	Labour St	tandards   Health an	d safety	
Time in and out	Da In Ou			
Audit type	Pe	eriodic		
Was the audit announced?	Sei	emi announced		
Was the Sedex SAQ available fo review?	r No	)		
Who signed and agreed CAPR?	A.H	H.M Hossain Ghany /	Manager (HR & Compliance)	
Any conflicting information SAC Audit Info	<b>)/Pre-</b> No	0		
Is further information available	? No	0		

#### Audit attendance

Senior management	Worker representative	Union representative

 $\leftarrow$  Contents <u>Findings</u>  $\rightarrow$ 



A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting		union as it is not mandatory by tee and the members of the wo ing meeting.	
Reason for absence during the audit	The facility did not have any worker participation commit was present during the audit	union as it is not mandatory by tee and the members of the wo t.	law. However, the facility had orker participation committee
Reason for absence at the closing meeting	The facility did not have any worker participation commit was present during the closi	union as it is not mandatory by tee and the members of the wo ng meeting.	law. However, the facility had orker participation committee

<u>← Contents</u> <u>Findings →</u>



#### **SMETA declaration**

#### **Auditor team**

#### **SMETA declaration**

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

- 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
- 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

#### Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

Due to technical error Md. Heman Babu (ASCA32200948) was not assigned to the SEDEX platform.

Lead auditor	Amin Sharif	APSCA Number	21703440
Additional auditor	Md. Heman Babu	APSCA Number	32200948
Date of declaration	2025-06-18		

<u>← Contents</u> <u>Findings →</u>



### Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	A.H.M Hossain Ghany
Title	Manager (HR & Compliance)
Date of declaration	2025-06-18

 $\leftarrow$  Contents <u>Findings</u>  $\rightarrow$ 



# **Summary of findings**

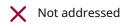
Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in	Local law Base code	NC ZAF600973478
	3.A Ensure a safe working environment. Put in	Local law Base code	NC ZAF600973482
	3.A Ensure a safe working environment. Put in	Local law Base code	NC ZAF600973487
	3.H Where identified as necessary to reduce r	Local law Base code	NC ZAF600973480
	3.K Ensure that all premises are safe and hav	Local law Base code	NC ZAF600973479
	3.L Implement effective processes to manage f	Local law Base code	NC ZAF-
	3.M Ensure all machinery is installed, mainta	Local law Base code	NC ZAF600973481
	3.N Maintain a log of all hazardous substance	Local law Base code	NC ZAF600973486
	3.N Maintain a log of all hazardous substance	Local law Base code	NC ZAF600973485
	3.0 Implement an appropriate electrical safet	Base code	NC ZAF-
5.A. Living wages are paid	5.A.A Review workers' total pay including ben	Base code	NC ZAF-
	5.A.B Put in place a wage improvement plan th	Base code	NC ZAF-
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a	Local law Base code	NC ZAF600973483
	10.A.B Comply with relevant local, regional a	Local law Base code	NC <u>ZAF600973484</u>

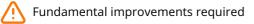
<u>← Contents</u> <u>Management systems →</u>



# Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	$\otimes$	$\otimes$	$\otimes$	$\otimes$
1.A. Responsible recruitment and entitlement to work	$\otimes$	$\otimes$	$\otimes$	$\otimes$
2. Freedom of association and right to collective bargaining are respected	$\otimes$	$\otimes$	$\otimes$	$\otimes$
3. Working conditions are safe and hygienic	$\otimes$	$\otimes$	i	i
4. Child labour shall not be used	$\otimes$	$\otimes$	$\otimes$	$\otimes$
5. Legal wages are paid	$\otimes$	$\otimes$	i	i
6. Working hours are not excessive	$\otimes$	$\otimes$	$\otimes$	$\otimes$
7. No discrimination is practiced	$\otimes$	$\otimes$	$\otimes$	$\otimes$
8. Regular employment is provided	$\otimes$	$\otimes$	$\otimes$	$\otimes$





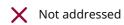
Some improvements recommended

Robust management systems

← Summary of findings



	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	$\otimes$	$\otimes$	$\otimes$	$\otimes$
9. No harsh or inhumane treatment is allowed	$\otimes$	$\otimes$	$\otimes$	$\otimes$
10.A. Environment 2-Pillar	$\otimes$	$\otimes$	$\otimes$	$\otimes$











# Site details

### Company and site details

Sedex company reference	ZC280188619	
Sedex site reference	ZS286418855	
Company name	Perfect Sweaters Limited	
Business ownership type	GOODS	
Site name	Perfect Sweaters Limited	
Site name in local language		
GPS location	GPS address	923, East Shewrapara, Mirpur, Dhaka- 1216, Bangladesh
	Coordinates	Latitude: 23.7912653; Longitude: 90.3734079
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	A.H.M Hossain Ghany
	Job title	Manager (HR & Compliance)
	Phone number	+8801711069705
	Email	compliance@perfectsweaters.com

 $\leftarrow$  Management systems  $\longrightarrow$  Worker analysis  $\rightarrow$ 



#### Company and site details

#### Applicable business and other legally required business license numbers and documents

Factory License No: License No: 11388/ Dhaka "F" category issued by Deputy Inspector General of the Department of Inspection for Factories and Establishments, (Govt. Of the People's Republic of Bangladesh) which is valid till 30th June 2025.

Fire License: License No: DD/Dhaka/16896/2002 issued by Bangladesh Fire Service & Civil Defense Authority which is valid till 30th June 2025.

Trade License: License No: TRAD/DNCC/000585/2022 issued by Dhaka North City Corporation which is valid till 30th June 2025.

Group Insurance Certificate: Bangladesh Garments Manufacturers and Exporters Association (BGMEA); Factory registration number: 3705, Certificate No: 20250900 and is valid till 31 December 2025.

Generator Waiver Certificate: The facility uses 01 generator (Diesel Based) 222 KW; Reference number Certificate No: LWC-1966, which is valid up to 14 May 2026.

Boiler license: The facility has a total of 01 Boiler inside the premises. Boiler details-Boiler no. BA. BO. 3077; valid up to 10 December 2025.

Drinking Water Test: Sample ID: CEN2025050144 & Date of reporting: 13 May 2025 from Department of Public Health Engineering (DPHE) found all the parameters within the acceptable limit.

← Management systems Worker analysis -



### Site activities

Site function	Finished Product Supplier Factory Processing/Manufacturer		
Site activities	Primary	Retail sale via stalls and markets of textiles, clothing and footwear	
	Secondary		
	Other		
Product type	All kinds of sweater items.	All kinds of sweater items.	
Process overview	Product manufactured: All kinds of sweater items.  Main production process: Winding, knitting, linking, trimming, mending, washing, sewing, pressing, FQC & packing.		
	Start operation (Year): 2016		
	Monthly production capacity: 1,20,000 pcs per month.		
	Yearly production turnover: 40 million USD		
	Machines used: Manual Washing Machine, Winding Machine, Knitting Machine, Linking Machine, Placket Machine, Lock stitch buttonhole machine, Chain stitch button sewing, Bar tech, Hydro Extractor Machine, Dust clean machine, Boiler Steam		
	Chemicals used: Softener, Silicon, Deterg	ent, Machine oil.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour		

### Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	4063m²	
Building 1	Last construction works on site	2001
	If building is shared, provide details	This shed is not shared.
	Number of floors	1
	Description of floor activities	Shed # 1 Ground Floor: Generator, Boiler.

 $\leftarrow$  Site details Worker analysis  $\rightarrow$ 



#### Site scope

2001 **Building 2** Last construction works on site If building is shared, provide details Shared with other 02 commercial entities of different business owners. **Number of floors** 8 Building #1 Description of floor activities Ground Floor: Sub Station, Fire Pump, Rest of the area shared with another business owner for the use of commercial purpose. 1st Floor: Empty floor 2nd Floor: Jacquard Section, Air Compressor, UPS & IPS room, Part Winding. 3rd Floor: Jacquard Multi Gauge Section, Knitting Distribution, Medical, Inspection Room. 4th Floor: FQC, Packing, Metal Free Zone Area, Finishing Section, Office Area. 5th Floor: Mending, Trimming, Sewing, Hole Button Section, Iron, Wash, Dining. 6th Floor: Linking, Linking Inspection, Linking Distribution, Knitting Inspection, Sample, Accessories Store. 7th Floor: Winding, Bonded Warehouse. Roof Top: Carteen, Solar Panel & Approximately 70% vaccant. Is there any difference between the site No scope of the audit and the Sedex site profile? Does the scope of the audit subdivide any Nο building or is limited to particular processes, products or businesses within the physical site? Is any activity conducted onsite not Nο included within the scope of the audit? Worker accommodation and transport Are there any site-provided worker No accommodation buildings? Does the site organise worker transport Not provided to the worksite? The site doesn't provide any transportation to the workers.

<u>← Site details</u> <u>Worker analysis –</u>



### Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%	
(70 or peak)	March	95-100%	April	95-100%	
	May	95-100%	June	95-100%	
	July	95-100%	August	95-100%	
	September	95-100%	October	95-100%	
	November	95-100%	December	95-100%	
Is there any night shift work at the site?	Yes				
	Facility has night pro	oduction shift in Jacqua	ard section from 8:00 p	om to 5:00 am.	
What percentage of the workforce, including temporary and agency workers, work during the night shift?	10%				
Was the audit conducted across all shift times, and did it include a representative	Yes				
sample of workers from each shift time in interviews and sampling?	Although the audit was conducted in day time the job card and payroll from night shift was reviewed.				

#### Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other social audit The facility has BSCI which is valid till 10 July 2027
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No such assessment was conducted
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No Such assessment was conducted

<u>← Site details</u> <u>Worker analysis →</u>



# Worker analysis

Gender disaggregated data available

Men and women

#### Worker totals

	Men	Women	Other	Total
Number of workers	140 (46.7%)	160 (53.3%)		300 (100%)

#### Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	140 (46.7%)	160 (53.3%)		300 (100%)
Temporary or fixed term employees	0 -	0 -		0 (0%)
Agency or subcontracted workers	0 -	0 -		0 (0%)
Seasonal workers	0 -	0 -		0 (0%)
Self-employed workers	0 -	0 -		0 (0%)
Informal workers including home workers	0 -	0 -		0 (0%)
Apprentices, trainees or interns	0 -	0 -		0 (0%)

\* % of total workforce

Audit company:

Intertek Bangladesh



### Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	126 (46.7%)	144 (53.3%)		270 (90%)
International migrant workers	0 -	0 -		0 (0%)
Total migrant workers	126 (46.7%)	144 (53.3%)		270 (90%)

<sup>\* %</sup> of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Mymensingh, Barisal, Cumilla and Khulna.

#### Workers by age

	Men	Women	Other	Total
18 - 24 years old	40 (40%)	60 (60%)		100 (33.3%)
15 - 17 years old	0 -	0 -		0 (0%)
Under 15 years old	0 -	0 -		0 (0%)

<sup>\* %</sup> of total workforce

Audit company:



Is the worker analysis data relevant for peak season and current to the audit?

Yes

Please list the nationalities of all workers, with the three most common nationalities listed first

Bangladeshi

### Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Bangladeshi	45%	55%	-	100%

<u>← Worker analysis</u> <u>Worker interviews →</u>



### Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	18 (37.5%)	30 (62.5%)		48 (16%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -		0 (0%)
Workers paid hourly / daily rate	0 -	0 -		0 (0%)
Salaried workers	122 (48.4%)	130 (51.6%)		252 (84%)

<sup>\* %</sup> of total workforce

### Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -		0 (0%)
Paid weekly	0 -	0 -		0 (0%)
Paid monthly	140 (46.7%)	160 (53.3%)		300 (100%)
Other	0 -	0 -		0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details

Not Applicable

Intertek Bangladesh

Audit company:

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### People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	24 (100%)	0 (0%)		24
Supervisors or team leaders	31 (93.9%)	2 (6.1%)		33
Administrative staff	13 (100%)	0 (0%)		13



# Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used?

Group interviews Individual interviews

#### Digital worker survey participants

	Ме	n	Women	Other	Total
Number of workers		-	-	-	-
Were any of the audit findings attributable to the survey?					
Was the interview sample representative of all types of nationality and employment types of workers?	Yes				
Was the interview sample representative of the gender composition of the workforce?	Yes				
Number and size of group interviews	04 groups of 05 em	ployees each			
Did workers understand the purpose of the audit?	Yes				
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes				
Was there any indication that workers had been 'coached' in how they should respond to questions?	No				
What was the general attitude of the workers towards their workplace?	Favorable				

<u>← Worker analysis</u>

 $\underline{\text{Measuring workplace impact}} \rightarrow$ 



### Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details)  Workers did not raise any significant concern during interview session.
What did the workers like the most about working at this site?	Social dialogue (e.g. freedom to associate) Freedom of movement Workplace benefits (e.g. child care provisions) Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Communication (e.g. from management) Grievance mechanisms Hours worked, rest days or breaks Pay Work environment – comfort (e.g. temperature, noise or dust levels) Equal opportunities Job security Overtime
Additional comments	The employees had a positive attitude towards their workplace; they had cordial and professional relations with workers and management. They found the management team amiable and approachable. 26 employees were selected for interview, they were interviewed as 04 Group of 05 and 06 workers were interviewed individually. The employees were assured of confidentiality, and they spoke freely of their views of the factory. All employees said they were satisfied with their employment at the factory, and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. The facility management treated them with respect. They can complain directly to their compliance responsible person or line manager and felt free to give their general concerns to their management representative.
Attitude of workers' committee/union representatives	Participation Committee member interviews were conducted privately in a separate place. They replied naturally regarding their responsibilities as workers committee members, and they also informed them that they can easily carry out their daily job without any difficulties. Participation Committee meetings are held on a regular basis. They also stated that they could give suggestions on all parts of the site's practices.
Attitude of managers	The facility management showed a positive attitude to this audit and during the whole audit process with his team were present through the audit process and co-operated the whole audit. Facility management respects client's requirement and allowed auditor to take photographs of all production process, best practices and nonconformities. They also provided required documents' photocopy and allowed auditors to interact with the employees confidentially. At the closing meeting, the facility management agreed with all the findings and suggested corrective actions.

 $\leftarrow$  Worker analysis

 $\underline{\text{Measuring workplace impact}} \rightarrow$ 

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### Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

### Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	10	10	-	20
Workers interviewed individually	2	4	-	6

### Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	10	13	-	23
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	10	13	-	23

← Worker interviews

 $\underline{\text{Measuring workplace impact}} \rightarrow$ 



# Measuring workplace impact

Gender disaggregated data available

Men and women

#### Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	3.0%	10.0%	-	13.0%
Last full calendar year (2024)	3.0%	5.0%	-	8.0%
Previous full calendar year (2023)	4.0%	7.0%	-	11.0%

<sup>\*</sup> Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

#### Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	4.0%	6.0%	-	10.0%
Last full calendar year (2024)	5.0%	7.0%	-	12.0%
Previous full calendar year (2023)	3.0%	8.0%	-	11.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] \* (Number of available workdays in the year).

Are accidents recorded?

Yes

All injury recorded in injury register and last injury recorded on 05 May 2025, which was a minor accident in jacquard section, needle cut the right-hand index finger.

<u>← Worker interviews</u> <u>Code area 0 →</u>



#### Annual number of work related accidents and injuries (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.29%	0.15%	-	0.37%
Last full calendar year (2024)	0.14%	0.12%	-	0.26%
Previous full calendar year (2023)	0.11%	0.14%	-	0.25%

<sup>\*</sup> Calculated as (number of work related accidents and injuries \* 100) / number of total workers.

#### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

<sup>\*</sup> Calculated as (number of lost days due to work accidents and work related injuries \* 100) / number of total workers.

#### Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

#### Percentage of workers that work on average more than 60 total hours in a given week

Men	Women	Other	Total

← Measuring workplace impact

Code area 0 →



### Percentage of workers that work on average more than 60 total hours in a given week

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%



### 0. Enabling accurate assessment

#### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section

Current systems:
•The facility allowed the auditors to conduct and complete the audit without any obstructions and no briberies were offered.

•All requested documents were provided timely to the auditors.
•The facility's site declaration and Sedex site profile found matched with current

• Facility ensures regular communication of the rights through orientation and midlevel management training programs.

• No falsification, and inconsistency in the documents were observed.

Evidence examined:

Training records.Original Business License.

Factory Policy

Audit company:

Intertek Bangladesh

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#### 0. Enabling accurate assessment

# **Data points**

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?

No

Did any workers selected by the auditor decline to be interviewed?

No

← Code area 0 Code area 1 →



# 1. Employment is freely chosen

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility developed and maintained appropriate policies and procedures to ensure the requirements of the code are fulfilled. A person was designated for implementing the procedures. Periodic training and awareness programs were ensured for all relevant employees and workers on the procedures. The facility monitors effectiveness of the procedures through regular monitoring and internal audit. During the audit, the management system was found to be robust.

#### Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

 $\leftarrow$  Code area 0 Code area 1.A →



#### Systems and evidence examined to validate this code section

- Existing system in place:
   The facility has a policy which prohibits forced labor, and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
   Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.

  • The facility did not require any payment for work tools, PPE, IC/staff card, training,
- The facility does not use any prison labor.
- The above was confirmed in management and employee interview.

- Evidence examined:
   Facility policy and procedure
- Sample employee personal files.
- Service book
- Employee handbook
- Time record.

← Code area 0 Code area 1.A →



### 1. Employment is freely chosen

# Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

 $\leftarrow$  Code area 1.A  $\rightarrow$ 



# 1.A. Responsible recruitment and entitlement to work

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ul> <li>The facility maintains a sound recruitment policy and procedures.</li> <li>Facility does not retain any original documents or take any recruitment fees.</li> <li>Workers are free to terminate their employment at any time they want by giving notice as per law.</li> <li>The facility communicates these policies to the employees through noticeboards and orientation training.</li> <li>The effectiveness of the policy is periodically monitored by the person responsible.</li> </ul>

#### Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

 $\leftarrow$  Code area 1 Code area 2  $\rightarrow$ 



#### Systems and evidence examined to validate this code section

Current Systems: The facility has a policy which prohibits forced labour, and this was also available for review.

- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the employees are free to leave the workplace outside of their working hours. The facility also has a written policy regarding this.

  • The facility did not require any payment for work tools, PPE, IC/staff card, training,
- The facility does not use any prison labour.
- The above was confirmed in management and employee interview.
  Only employees with a legal right to work shall be employed or used by the factory.
- The youngest age was 19 years old.

#### Evidence examined:

- Recruitment policy.
  Policy on No-Forced labour and prison labour.
  Sample employee personal files.
- Service book.
- · Time record.

← Code area 1 Code area 2 -



### 1.A. Responsible recruitment and entitlement to work

# **Data points**

#### Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non- employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable
Migrant workers	
Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	90%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Mymensingh, Barisal, Cumilla and Khulna.

← Code area 1.A Code area 2 →



#### Recruitment fees

Were you able to detect recruitment fees
and costs paid by workers during the
recruitment and employment process?

No

Based on documents review, management interview and workers interview it was found that, facility does not take any recruitment fees from workers.

Were recruitment fees or costs identified during worker interviews?

No

No recruitment fees or costs has identified during worker interviews.

 $\leftarrow$  Code area 1.A  $\qquad$  Code area 2  $\rightarrow$ 



# 2. Freedom of association and right to collective bargaining are respected

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	•The audited factory has developed appropriate policies and procedures (Freedom of Association and Rights to Collective Bargaining) according to its context and made it clear who and how will implement the policies and procedures. •Based on the interview, proper responsibilities have been assigned and the main responsible for this Base Code area has necessary seniority and skill sets. •Factory has formed worker representative committee (PC) through democratic election process and encouraged the PC to sit periodically according to legal

requirement.
•Effective training and communication of policy and procedures to all relevant workers, including managers and supervisors have been established which was proved during individual and group interview session. The workers were aware of their representative and were aware as well regarding the procedure to place grievance (if

any).
•All four aspects of the management system were found robust.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1.A Code area 3 →



#### Systems and evidence examined to validate this code section

- Existing system in place:
   All the employees are allowed to form or join the Trade union Or Participation Committee of their choice.
- There is no trade union in the facility but there is a Worker Participation Committee formed by election process on 20 March 2024
- Regular meeting of Participation Committee is held, last meeting was held on 12 May 2025
- Meeting minutes are posted in notice board and recorded in a register.
- Total Participation committee member is 10 where 05 members from worker side and 05 are from management side.
- Members of Participation Committee are not treated less favorably than other workers.
- Members of Participation Committee are allowed to carry out their duties within working hours without affecting their pay.

#### Evidence examined:

- Freedom of association policy review
- Worker Participation Committee formation records, election documents.
  Worker Participation Committee member list.
- Worker Participation Committee meeting record.

← Code area 1.A Code area  $3 \rightarrow$ 



## 2. Freedom of association and right to collective bargaining are respected

## **Data points**

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

 $\leftarrow$  Code area 2  $\bigcirc$  Code area 3  $\rightarrow$ 



## 3. Working conditions are safe and hygienic

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The facility has placed proper policies to keep conditions safe and hygienic.  *Workers are provided with appropriate PPE. However, effective training and communications must be ensured.  *A safe and hygienic working environment was provided, bearing in mind the prevailing knowledge of the industry and specific hazards. Adequate steps already taken to prevent accidents and injury  *Workers received regular and recorded health and safety training.  *Facility Provided clean toilet facilities and potable water. Storage shall be provided.  *Facility assign responsibility for health & safety to a senior management representative.  *The facility monitors the effectiveness of the procedures through regular monitoring and internal audit, but some deviations were found in implementation.  *There are two aspects of the management system that were found robust, and two aspects of the management system were found to need some improvement.

## Summary of findings

Code area Workplace requirement	Area of NC	Finding
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← Code area 2 Code area 4 →



3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in	Local law Base code	NC	ZAF600973478
	3.A Ensure a safe working environment. Put in	Local law Base code	NC	ZAF600973482
	3.A Ensure a safe working environment. Put in	Local law Base code	NC	ZAF600973487
	3.H Where identified as necessary to reduce r	Local law Base code	NC	ZAF600973480
	3.K Ensure that all premises are safe and hav	Local law Base code	NC	ZAF600973479
	3.L Implement effective processes to manage f	Local law Base code	NC	ZAF-
	3.M Ensure all machinery is installed, mainta	Local law Base code	NC	ZAF600973481
	3.N Maintain a log of all hazardous substance	Local law Base code	NC	ZAF600973486
	3.N Maintain a log of all hazardous substance	Local law Base code	NC	ZAF600973485
	3.0 Implement an appropriate electrical safet	Base code	NC	ZAF-

 $\leftarrow$  Code area 2 Code area 4  $\rightarrow$ 



#### Systems and evidence examined to validate this code section

- 1. General Health and Safety management
- A.H.M Hossain Ghany Manager (HR & Compliance) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas and last test was done from DPHE on
- 13 May 2025.
   Tested parameters were pH, TDS, Iron, Arsenic, Total coliform etc. where all the parameters were within acceptable limit as per ECR 2023 and WHO guideline for . drinking water.
- Sufficient clean toilets were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
  The facility has a safety committee consisting of 06 members which was formed on 27 March 2024 as per local law. There are 03 members from workers side, and 03

members from management side. Minutes of meetings show that Safety committee meeting held once every three months. Last meeting was held on 05 June 2025.

#### 2. Fire Safety

- There are 02 or more exit in each room which were open throughout the working hour.
- Assembly area was found in front of the facility building.
- Firefighting equipment was adequate, and checks were up to date. Facility checked all fire equipment schedules wise. Fire equipment last checking was done on 03 June 2025
- The facility management posted the evacuation plans on every production floors/shed with local language.

- Fire hose found active in all production building.
  Facility installed addressable smoke detection system in all production building.
  Facility has an emergency response team of 67 members where all members are trained.
- The last fire drill was conducted on 15 May 2025 by the Manager- Compliance. This fire drill was conducted on an unannounced basis. It took 02: minutes 50 Seconds. A total of 346 employees were present in the fire drill. No injuries were found.
- The last fire drill was conducted on 15 May 2025 by the Manager- Compliance. This fire drill was conducted on an unannounced basis. It took 01: minutes 53 Seconds. A total of 26 employees were present in the fire drill. No injuries were found.
- The last day fire drill was conducted 31 August 2024 by Sr. Station Officer (Fire Service & Civil Defense). This fire drill was conducted on an announced basis. It took 02: minutes 57 Seconds. A total of 294 employees were present in the fire drill. No injuries were found.

### 3. Electrical, Machine & fire safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Facility has 03 certified electrician who check and do inspection for whole facility. • Facility checks all electric channels, distribution board and electric connection as required. The last inspection record of some equipment are given below,
- Machine maintenance-The last maintenance date of the Machine is 03 June 2025, Check by Mechanic.

Generator Maintenance- Last inspection date of Generator is 01 February 2025, Check by electrician.

Compressor Maintenance - Last inspection date is 17 June 2025, check by electrician. DB Maintenance - Last inspection date is 11 April 2025, done by electrician. Boiler Maintenance- Last inspection date of Boiler is 18 June 2025, Check by Boiler Operator.

#### 4. First Aid:

- There were 09 first aid boxes with sufficient kits in the full facility.
- There were 22 internal first aider.
- They also arranged first aid training with first aider.
  The facility has Hospital Agreement with Al-Helal Specialized Hospital Ltd located at Begum Rokeya Sarani, Senpara Parbota, Mirpur-10, Dhaka-1216, Bangladesh valid up to 25 October 2026.

#### 5. Dormitory:

Facility didn't provide dormitory facilities to any employees.

← Code area 2 Code area 4 -

Audit reference: End Date: Audit company: Start Date: 2025-06-18 2025-06-18 **Intertek Bangladesh** ZAA600139887



6. Training

The facility provides below training to the employees. The last training records are given belów.

given below.

Orientation Training: Last Date of training: 05 May 2025/ Participant: 13/ Trainer
Designation: Manager- Compliance / Frequency of training: As required.

Fire Fighting Training (Internal): Last Date of training: 14 May 2025/ Participant: 20 /
Trainer Designation: Manager- Admin/ Frequency of training: Monthly.

Fire Fighting Training (External): Last Date of training: 28-29 August 2024/ Participant: 40 / Trainer Designation: Sr. Station Officer (FSCD)/ Frequency of training: As required.

First Aid Training: Last Date of training: 18 May 2025 / Participant: 12 / Trainer Designation: Medical Officer / Frequency of training: Monthly.

Awareness training on Anti-harassment. discrimination & abuse: Last Date of training:

•Awareness training on Anti-harassment, discrimination & abuse: Last Date of training: 18 May 2025/ Participant: 13 / Trainer Designation: Manager- Compliance / Frequency of training: Monthly

•Occupational Health & Safety Training: Last Date of training: 05 May 2025/ Participant: 15/ Trainer Designation: Manager- Compliance / Frequency of training: Monthly.
•Mid-Level management Training: Last Date of training: 05 May 2025 / Participant: 12/ Trainer Designation: Manager- Compliance / Frequency of training: As required.
•PPE Training: Last Date of training: 08 May 2025 / Participant: 14; Trainer Designation:

Manager- Compliance / Frequency of training: Monthly.

•Chemical Handling Training: Last Date of training: 14 May 2025 / Participant: 07;
Trainer Designation: Manager- Compliance / Frequency of training: Monthly.

The facility tests their air, noise and drinking water quality from third party. The last test records are given below:
- Facility last tested water from DPHE on 13 May 2025.

#### Evidence examined:

- ·License review
- •Building approval plan
- Group insurance
- Water test report
- •Air, light, noise, stack emission test report, GHG Emission, and EIA.
- •Injury record and analysis report •Machine and electric maintenance record
- Risk assessment report
- Training records
- Safety committee record
- •Electric installation checking record •Training records and certificates
- •Fire equipment maintenance records
- Fire drill records
- Accident reports
- Chemical list and MSDS for each chemical
- Health and safety policyPotable water testing certificates

← Code area 2 Code area 4 -



**Status** 

Open\*

60 days

Time given to resolve

**Verification method**Desktop audit

conformance

Local law

Base code

Area of non-compliance/non-

44

## Findings: non-compliances

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Issue title

314 - Medical facilities do not meet legal requirements

Description

Based on document review and interviews with management during this periodic audit, it was observed that corrective actions have not yet been taken. The facility management did not employ a medical assistant as required by law.

**Description (carried over)** 

It was noted from facility tour and management interview that the facility had a dedicated team with 1 medical officer and 1 nurse for the medical facility. But the facility did not have any medical assistant as per legal requirement.

Corrective and preventative actions

Based on document review and interviews with management during this periodic audit, it was observed that corrective actions have not yet been taken. The facility management did not employ a medical assistant as required by law.

Corrective and preventative actions (carried over)

It is recommended that the facility should arrange all the medical facilities as per legal requirements.

Local law reference

In accordance with Bangladesh Labour Rules, 2015, Rule 77 (1): At least one registered Physician shall be in each Treatment Unit of the institute or factory with the facility of dispensary. Additionally, at least one trained compounder or medical assistant, nurse and subordinate employee shall be employed for helping him/her, provided that at least two registered Physicians shall be recruited in case of an institute where more than three thousand employees/workers work and necessary number of medical assistant and nurse shall be recruited for helping the Doctors.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No changes in verification method and timeline.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 3 Code area 4 →



**Status** 

Open\*

90 days

Time given to resolve

**Verification method**Desktop audit

conformance

Local law

Base code

Area of non-compliance/non-

#### Code area

3 Working conditions are safe and hygienic

#### Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

#### Issue title

397 - Childcare facilities are not provided in alignment with legal requirements

#### Description

Based on site tour, management & workers interview during this periodic audit it was observed that, corrective actions have not yet been implemented regarding the establishment of a childcare facility, The facility management has not provided a designated childcare space within the premises for the children (under 6 years of age) of female workers, as required by law.

#### **Description (carried over)**

Based on site tour, management & workers interview it was observed that, facility don't have any childcare room for the children of the female workers.

#### Corrective and preventative actions

Based on site tour, management & workers interview during this periodic audit it was observed that, corrective actions have not yet been implemented regarding the establishment of a childcare facility, The facility management has not provided a designated childcare space within the premises for the children (under 6 years of age) of female workers, as required by law.

#### Corrective and preventative actions (carried over)

It's recommended that, facility should ensure a proper childcare room equipped with necessary facilities for the children of the female workers.

#### Local law reference

Bangladesh Labour Law 2006, Section 94 (1): In every establishment, where 40 (forty) or more female workers are ordinarily employed, one or more suitable rooms shall be provided and maintained for the use of their children who are under the age of 6 (six) years.

## Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No difference in verification time and method.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600973487

Non-compliance

Due 2024-08-24

45

Code area

3 Working conditions are safe and hygienic

Status Open\*

← Code area 3 Code area 4 →



Time given to resolve

**Verification method**Desktop audit

conformance

Local law Base code

Area of non-compliance/non-

60 days

#### Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

#### Issue title

318 - Inadequate/isolated failure in conducting medical examinations or occupational health checks, including disease checks, of workers in hazardous situations(e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

#### Description

Based on document review, workers and management interview during this periodic audit It was observed that, corrective action has not been taken yet. the facility management did not conduct occupational health checks for workers involved in hazardous job duties, such as in louder areas and those are expose to chemicals.

#### **Description (carried over)**

It was noted during document review and management interview that the facility didn't conduct health checkup of workers working in contact with hazardous occupations and harmful substances e.g., electricians, boiler operators, all of the jacquard machine operators etc.

#### Corrective and preventative actions

Based on document review, workers and management interview during this periodic audit It was observed that, corrective action has not been taken yet. the facility management did not conduct occupational health checks for workers involved in hazardous job duties, such as in louder areas and those are expose to chemicals.

#### Corrective and preventative actions (carried over)

It is recommended that the facility should ensure the health checkup is done for workers working in contact with hazardous occupations and harmful substances.

#### Local law reference

Bangladesh Labour Rules 2015, Schedule 4 (6) (c): (c) Ensuring obligation of health check-up of workers working in contact with hazardous occupations and harmful substances.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600973480

Non-compliance

Due 2023-06-08

46

Code area

3 Working conditions are safe and hygienic

Status Open\*

← Code area 3

Code area 4 
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#### Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

#### Issue title

278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

#### Description

Based on document review and management interviews conducted during this periodic audit, it was observed that corrective action has not yet been taken. Specifically, 5 out of 15 randomly selected auto knitting (Jacquard) operators were not wearing ear plugs, posing a risk of potential hearing damage due to exposure to high noise levels.

#### Description (carried over)

Based on site tour it was observed that, facility didn't take proper corrective action regarding the finding. Moreover, similar kind of finding also observed in different areas which as follows, randomly checked 03 out of 10 Jacquard machine operators weren't using ear plugs at 2nd floor of building 01.

#### Corrective and preventative actions

Based on document review and management interviews conducted during this periodic audit, it was observed that corrective action has not yet been taken. Specifically, 5 out of 15 randomly selected auto knitting (Jacquard) operators were not wearing ear plugs, posing a risk of potential hearing damage due to exposure to high noise levels.

#### Corrective and preventative actions (carried over)

It is recommended that the facility should provide and ensure the proper use of the mentioned PPE for the mentioned area.

#### Local law reference

Bangladesh Labour Rules, 2015, Rule 67(2) Arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment's, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage.

## Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No changes in verification method and timeline.

#### **Evidence**

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law Base code

← Code area 3

Code area 4 →

C





Auto knitting (Jacquard) operators were not wearing ear plugs.jpg



\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

#### ZAF600973479

3 Working conditions are safe and hygienic

#### Workplace requirement

3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.

#### Issue title

Code area

252 - Premises used for combined purposes (e.g. commercial or residential premises) and therefore could pose a safety threat

#### Description

Based on document review and interviews with management during this periodic audit, it was observed that corrective actions have not yet been taken. The facility has not obtained building approval from RAJUK (Rajdhani Unnayan Kartripakkha) for industrial use; the current approval is limited to commercial use only.

#### **Description (carried over)**

It was noted from document review and management interview that facility obtain building approval from RAJUK (Rajdhani Unnayan Kartripakkha) with the commercial construction purpose instead of industrial purpose on 27 November 1997.

#### Corrective and preventative actions

Based on document review and interviews with management during this periodic audit, it was observed that corrective actions have not yet been taken. The facility has not obtained building approval from RAJUK (Rajdhani Unnayan Kartripakkha) for industrial use; the current approval is limited to commercial use only.

#### Corrective and preventative actions (carried over)

It is recommended that facility should get legal approval for occupied building(s) and shed(s) as per its nature and uses from competent local authority.

Non-compliance

Due 2024-04-08

48

Status

Open\*

Time given to resolve

365 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law Base code

← Code area 3

Code area 4 →

C



#### Local law reference

Building Construction Act 1952, Section 3A (1): No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction.

## Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No changes in verification method and time.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

### ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

#### Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

#### Issue title

180 - No sufficiently trained person appointed to oversee fire safety, fire prevention and fire evacuation procedure (e.g. 'fire marshal') as required by law

#### Description

Based on site tours conducted during this audit, it was observed that the facility management has not employed a qualified individual as safety officer as required by law.

#### Corrective and preventative actions

It is recommended that the facility management should employ a qualified individual as safety officer as required by law.

#### Local law reference

Bangladesh labor rules 2015 rules 55 (12)A trained officer shall be recruited in the factory/institute where at least 500 workers are employed. The duties of the officer shall be ensuring the preservation and maintenance of all fire-fighting equipments and keeping them fit and arranging trainings for the three teams mentioned in Sub-section 10 after every six-month period.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

#### ZAF600973481

Non-compliance

Status

Open\*

30 days

Time given to resolve

**Verification method**Desktop audit

conformance

Base code

Area of non-compliance/non-

Due 2023-10-06

49

Code area

3 Working conditions are safe and hygienic

Status Open\*

← Code area 3

Code area 4 →

C



Time given to resolve

Verification method

Area of non-compliance/non-

Desktop audit

conformance

Local law

Base code

180 days

#### Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

#### Issue title

272 - Lack of appropriate equipment/machinery - creating a moderate risk to workers

#### Description

Based on document review and interviews with management during this periodic audit, it was observed that corrective actions have not yet been taken. The facility has not installed an elevator in its 8-story building, despite having operational activities on the 6th and 7th floors. As a result, workers are required to climb up to the 7th floor by foot, which may pose health and safety concerns.

#### Description (carried over)

Based on site tour it was observed that, facility didn't take any corrective action for setting up any lift or elevator for the workers in their 08 storied building.

#### Corrective and preventative actions

Based on document review and interviews with management during this periodic audit, it was observed that corrective actions have not yet been taken. The facility has not installed an elevator in its 8-story building, despite having operational activities on the 6th and 7th floors. As a result, workers are required to climb up to the 7th floor by foot, which may pose health and safety concerns.

#### Corrective and preventative actions (carried over)

It is recommended that facility should have lift for the building as per legal requirement.

#### Local law reference

Bangladesh Building Construction Rules, 1996, Sec: 25 (1a), Sec: 25 (1a) For building with 6 storied or more floor shall have; (a) for ascending and descending there shall have a system of lift or elevator.

## Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No change in verification methos and time.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600973486

Non-compliance

Due 2024-07-25

50

Code area

3 Working conditions are safe and hygienic

Status Open\*

← Code area 3 Code area 4 →



Time given to resolve

Verification method Desktop audit

conformance

Local law

Base code

Area of non-compliance/non-

30 days

#### Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

#### Issue title

241 - No/inadequate spill kit provided for handling chemical spillage and leakage

#### Description

Based on site tour conducted during this periodic audit, it was observed that corrective action has not yet been taken. The facility management did not provide spill kit at chemical storage point in washing section on the 5th floor of building 1.

#### **Description (carried over)**

Based on site tour & management interview it was observed that, no chemical spill kit was found available within chemical usage of washing section as well as storage areas at 5th floor of building 01.

#### Corrective and preventative actions

Based on site tour conducted during this periodic audit, it was observed that corrective action has not yet been taken. The facility management did not provide spill kit at chemical storage point in washing section on the 5th floor of building 1.

#### Corrective and preventative actions (carried over)

It's recommended that, facility should have a proper chemical spill kit management system in the mentioned areas

#### Local law reference

Bangladesh Labor Rules 2015, rule 67(1)

Safety measures and health safety must be arranged in accordance with the directions of this Rule or the regulations of the concerned govt. department for the workers who are employed in the procedures of manufacturing processes that have high risks of physical injury or loss.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

#### ZAF600973485

Non-compliance

Due 2024-07-25

51

#### Code area

3 Working conditions are safe and hygienic

#### Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

#### Issue title

242 - No/inadequate eye wash/shower station in hazardous environments including chemical areas

#### Description

Based on site tour conducted during this periodic audit, it was observed that corrective action has been taken. Eye wash station found functional at washing section.

Status

Closed (2025-06-18)\*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law Base code

← Code area 3 Code area 4 →



#### **Description (carried over)**

Based on site tour & management interview it was observed that, randomly checked 01 out of 01 eye wash station found non-functional at Washing Section located at 5th floor of building 01.

#### Corrective and preventative actions

Based on site tour conducted during this periodic audit, it was observed that corrective action has been taken. Eye wash station found functional at washing section.

#### Corrective and preventative actions (carried over)

It's recommended that, facility should have functional eye wash station in the mentioned area.

#### Local law reference

Bangladesh Labor Rules 2015, rule 67(1)

Safety measures and health safety must be arranged in accordance with the directions of this Rule or the regulations of the concerned govt. department for the workers who are employed in the procedures of manufacturing processes that have high risks of physical injury or loss.

#### **Evidence**



NC Photo\_ Eye was station found non-functional..jpeg

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\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

## ZAF-

Non-compliance

52

Code area 3 Working conditions are safe and hygienic **Status** Open\*

← Code area 3 Code area 4 -

Audit reference: Audit company: Start Date: End Date: Intertek Bangladesh ZAA600139887 2025-06-18 2025-06-18



#### Workplace requirement

3.0 Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

#### Issue title

228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels

#### Description

Based on site tours conducted during this audit, it was observed that the facility management has not provided rubber insulating mats in front of 3 out of 5 electrical distribution boards. This poses a potential safety hazard.

#### Corrective and preventative actions

It is recommended that the facility should provide rubber mats in front of electricity distribution board.

#### **Evidence**



Rubber insulating mats was not provided in fornt of electrical distribution boards.jpg

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## Time given to resolve

30 days

## **Verification method**Desktop audit

## Area of non-compliance/non-conformance

Base code

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 3 Code area 4 →



## 3. Working conditions are safe and hygienic

# **Data points**

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes  Sites have a structural engineer evaluation, by RAJUK, Dhaka on 27 November 1997.  Site have a machine lay out evaluation by Department of Inspection for Factories and Establishments (DIFE) on 28 May 2025.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

← Code area 3 Code area 4 →



## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The facility has a recruitment policy that does not allow child labor. Furthermore, the facility also has a very full-proof policy on child labor, and they have put it into practice. There is a poster on the facility gate to discourage child labor. • Finally, effective monitoring ensured sufficient management of Workplace Requirements in this Base Code Area. All four aspects of the management system were found robust. Proper policy, resources, training and monitoring were in place.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

<u>← Code area 3</u> <u>Code area 5 →</u>

55



#### Systems and evidence examined to validate this code section

- Existing system in place:
   The facility has established a practice that they will never employ and use any child labor.
- The facility has policy and remediation plan on child labor.
  The facility verifies all workers' original national ID card, birth certificate, school certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
  Factory verifies the workers age through registered doctors.
  Sampling basis amplayers' personal files was taken for registery.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photocopied national identification card and other documents.

  • There was no child or young employee observed in the facility.

#### Evidence examined:

- Recruitment policy.
   Policy on No-Child labour.
   Personal file including Birth certificate, primary/secondary education certificate, National ID card, etc. of sample employees.

   Accurrification documents.
- Age verification documents.

Code area 5 → ← Code area 3



### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger	33%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

 $\leftarrow$  Code area 4  $\bigcirc$  Code area 5  $\rightarrow$ 



## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.The facility has comprehensive and well documented policy and procedure on wages that align with SMETA standard. The facility also addressed the living wages in their policy and procedures. The policies are reviewed and updated annually to ensure they remain relevant and effective.  2.A senior manager and his team with clear authority and responsibility oversees the implementation of these policies to ensure the sustainable compliance over time.  3.The facility has training program but some improvement are recommended to ensure sustainable compliance over time. Although the factory addressed living wages in their policy and procedure, the factory does not provide effective training on living wages and few workers found lack of knowledge on the living wages.  4.Regular monitoring and internal audit are conducted. However some improvement are recommended to ensure sustainable compliance over time as the facility has not completed living wages gap analysis as well as the facility has not established wage improvement plan with living wage.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 4 Code area 5.A →



#### Systems and evidence examined to validate this code section

Existing system in place:
• The facility is providing at least local legal minimum wage BDT 12500/month for all the employees. At present all workers are earning above legal minimum wage.

Time keeping system is Finger punch system.

- · All workers are 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.
- Benefits are paid such as maternity benefit, festival bonus, earned leave, service

compensation to appropriate workers.

• All insurance payments are paid in a timely manner.

• All employees are paid within 07th working days after completion of each month through hand cash.

• Each employee was given a pay slip.

Employees are aware of their minimum wage.
Salary sheet and timecard review: May 2025 (Current paid month), December 2024 (off-peak operation month) and September 2024 (peak paid month).

#### Evidence examined:

- Salary sheet reviewOvertime payment record review
- Pay slip review
- Attendance register review
- Production record review
- Maintenance register review
- Leave record review.
- Final settlement record review.
- · Earned leave record review.
- · Festival bonus records review.

← Code area 4 Code area 5.A -



### 5. Legal wages are paid

## **Data points**

What is the basic wage paid to workers?	The legal minimum wage Wages are based on 'piece work' (e.g. the number of items produced or harvested) Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details)
bank accounts to pay workers:	Payment Method Hand Cash
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

### Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?

### **Summary information**

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	Non applicable

← Code area 5 Code area 5.A →



Max hours per week Max hours per month  Max hours per day L2.0  Max hours per week Min per month  Min per day Min per day Min per week Min per month  Actual per hour Actual per hour Actual per week Mon applicable Mon applicable Actual per month  Min per day Mon applicable Actual per month Minimum legal overtime wage Min per day Min per week Mon applicable Actual per month Min per day Mon applicable Actual per week Actual per week Actual per month Non applicable Mon applicable Actual per month Non applicable Actual per month Non applicable Mon applicable Actual per month Non applicable			
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records 26 samples taken from December 2024 (off-peak operation month)	Number of workers' records checked	78	
	Provide the date and details of the records	26 samples taken from December 2024 (o	off-peak operation month)

 $\leftarrow$  Code area 5.A  $\rightarrow$ 



Are there different legal minimum/ legally recognised CBAs wage grades?	Yes
	Garments Gazette - Minimum wage gazette published on 18 December 2023, Gazette No. 40.00.0000.016.32.021.13.30.: Minimum wage of Grade 1: BDT 15,035; Grade 2: BDT 14,273; Grade 3: BDT 13,550; Grade 4: BDT 12,500.
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	Above Minimum Wage- 100%
Are there any bonus schemes used?	Yes
	The facility provide bonus to workers- • Management has provided attendance bonus to the workers.
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

 $\leftarrow$  Code area 5.A  $\rightarrow$ 



## 5.A. Living wages are paid

### **Summary of findings**

Code area	Workplace requirement	Area of NC	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben	Base code	NC ZAF-
	5.A.B Put in place a wage improvement plan th	Base code	NC ZAF-
Systems and evidence examined to Current Systems:			

## validate this code section

- •The facility ensures that all payments including benefits are done as per legal
- requirements.
  •The facility has not conducted living wage gap analysis and the facility has not established any wage improvement plan with living wage.

- Evidence examined:
   Salary sheet review.
   Living wage calculation method.
- Overtime payment record review.

- Pay slip review.
  Attendance registers review.
  Maternity benefit registers review.
  Leave record review.

← Code area 5 Code area 6 →



## Findings: non-compliances

7AF-

Non-compliance

#### Code area

5.A Living wages are paid

#### Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

#### Issue title

904 - CAR: A living wage gap analysis has been completed but it is missing key elements

#### Description

Based on the document review and interview it was noted that, the facility has calculated living wages but did not conduct an analysis considering all related elements to identify the gaps between actual wage paid by site and credible living wage benchmark.

### Status

Open\*

Time given to resolve

#### Verification method

Collaborative action required

## Area of non-compliance/non-conformance

Base code

#### Corrective and preventative actions

It is recommended that; the facility should conduct an analysis by considering all related elements to understand the gaps of living wage.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

#### ZAF-

Non-compliance

64

### Code area

5.A Living wages are paid

#### Workplace requirement

5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.

#### Issue title

905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed

#### Description

Based on document review and management interview, the facility management did not make a plan aim to pay workers a living wage within standard timeframe.

#### Status

Open\*

Time given to resolve

### Verification method

Collaborative action required

## Area of non-compliance/non-conformance

Base code

#### Corrective and preventative actions

It is recommended that; the facility management should make plan aim pay workers a living wage within standard timeframe.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 5.A Code area 6 −



## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	• In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either. •All four aspects of the management system were found robust. Overtime is completely voluntary as per Law.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 5.A Code area 6 →



#### Systems and evidence examined to válidate this code section

- Existing system in place:
   In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either.

  Through employees' interview it was noted that, overtime is voluntary.

  Time keeping systems is finger punch system.

  All overtime is compensated at a premium rate for all employees.

- All overtime is compensated at a premium rate for all employees.
  According to time records and worker interviews, basic working hours were 8 hours per day and a max 48 hours per week. Overtime is voluntary. In general, the employees work 6 days a week (Saturday to Thursday). Friday is a weekly holiday.
  All the department of the facility operates in one general shift from 08:00 am to 05:00 pm with 1-hour lunch break in 1 shift from 01:00 pm to 02:00 pm. Only Jacquard section and Electricians are operating in two shifts from 8:00 am to 5:00 pm and 8:00 pm to 5:00 am including 1-hour meal break.
  Facility has 03 shifts for security; shift-A (from 06:00 am to 02:00 pm), shift-B (from 02:00 pm to 10:00 pm) and shift-C (from 10:00 pm to 06:00 am) for security guards including 01-hour Interval for rest or meal in each shift
- including 01-hour Interval for rest or meal in each shift.

- Evidence examined:
   Employees' interviews
   Management interview
- Facility policy on working hoursSalary sheet
- Payslip
- Job card
- Attendance register
- Production record
- Quality and production records to cross check working hours.

← Code area 5.A Code area 7 -



## 6. Working hours are not excessive

## **Data points**

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	54.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

 $\leftarrow$  Code area 6 Code area 7 →



## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	•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.  •Gender discrimination is not applicable if there is no female worker in the facility.  •There was an internal grievance process; all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.  •All four aspects of the management system were found robust. Proper policy, resources, training, and monitoring were in place.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

<u>← Code area 6</u> <u>Code area 8 →</u>



## Systems and evidence examined to validate this code section

Existing system in place:
• 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.
• There was no evidence of sexual harassment.

There was no evidence of sexual harassment.
There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
The factory provides the same wage amount to all employees of the same rank.
There is no restriction for formation of trade union in the factory.

- Evidence examined:
   Policy of Anti-Discrimination.
   Recruitment policy.
- Training record. • Termination records.
- Employee rights.

← Code area 6 Code area 8 →



## 7. No discrimination is practiced

# **Data points**

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	Bangladeshi

<u>← Code area 7</u> <u>Code area 8 →</u>



## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ul> <li>All employees were recruited by the factory directly.</li> <li>All employees are getting signed labour contract and Identity card during their recruitment.</li> <li>Facility maintains service books for all employees.</li> <li>All four aspects of the management system were found robust. Overtime is completely voluntary as per Law.</li> </ul>

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined validate this code section	d to  Current System:  All employees were recruite No agency used to hire any identified by the auditors.  No process subcontractors  Evidence Examined: Recruitment policy. Employees personal file. Appointment letter. Employee service book. New employee joining regis	worker, apprenticeship sche were used.	emes or home worker was

 $\leftarrow$  Code area 7 Code area 8.A  $\rightarrow$ 



## 8. Regular employment is provided

# **Data points**

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

 $\leftarrow$  Code area 8.A →



# 8.A. Sub-contracting and homeworkers are used responsibly

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ul> <li>No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.</li> <li>No sub-contracting and homeworking were used by this facility.</li> <li>All four aspect of the management system was found robust. Proper policy, resource, training and monitoring were in place.</li> </ul>

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examin validate this code section	<ul> <li>All permanent employees w</li> </ul>	enticeship schemes or home neworking were used by this abour contract and ID card c	e worker was identified by the sfacility.
	Evidence examined: • Shipment record. • Goods in and out register. • Production record. • Goods in and out gate pass	/ records.	

<u>← Code area 8</u> <u>Code area 9 →</u>



## 8.A. Sub-contracting and homeworkers are used responsibly

# **Data points**

Are homeworkers employed directly or engaged through an agent?

Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-
What processes are carried out by homeworker?				
Are full records of homeworkers available at the site?				
Does the supplier buy products or services from suppliers that use homeworkers?	No The facility has no home	worker.		
Sub-contracting				
Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No The site did not have any capacity	y sub-contracting on site, giv	<i>v</i> ing considerations to the	workers'
Are any sub-contractors used?	No			

← Code area 8.A Code area 9 →



## 9. No harsh or inhumane treatment is allowed

#### Management systems

Develop and maintain relevant policies
and procedures to ensure workplace requirements are met
requirements are met

**Robust Management Systems** 

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

**Robust Management Systems** 

Monitor the effectiveness of procedures to meet policy and workplace requirements

**Robust Management Systems** 

**Explanation for management systems** grades

The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

 The facility provides training on Anti-harassment. The Anti-harassment issue is also covered in employee orientation training.

 All four aspects of the management system was found robust. Proper policy, resources, training and monitoring were in place.

### Summary of findings

Code area workplace requirement Area of NC Finding	Code area	Workplace requirement	Area of NC	Finding
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#### No findings

#### Systems and evidence examined to validate this code section

Existing system in place:

- The facility has established anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

  • The facility provides training on Anti-discrimination to employees during orientation
- training.

• Facility also has a working antiharassment committee.

• Through the facility management and employee interview, it was noted that no physical abuse happened in the factory.

Evidence examined:

- · Anti-Harassment policy
- Anti-Harassment Committee
- Grievance box open register.
- Orientation training record.

← Code area 8.A Code area 10.A -

Audit reference: End Date: Audit company: Start Date: ZAA600139887 2025-06-18 2025-06-18 **Intertek Bangladesh** 



## 9. No harsh or inhumane treatment is allowed

# Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	Facility has grievance mechanism policy procedure to resolve all grievances swiftly. They have grievance boxes in confidential area like toilet. Workers can also raise grievance through facility provided hotline. Facility communicates grievances which has resolved with their worker. The facility posted grievance box outside the gate for local community.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

 $\leftarrow$  Code area 9 Code area 10.A →



# 10.A. Environment 2-Pillar

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Existing system in place:  • The facility has prepared an environmental policy and procedure.  • The facility disposes all solid waste in a segregated area with proper level and identification.  • The facility also provides awareness training to all related personnel.  • The facility has Wastage agreement  • All four aspects of the management system was found robust. Proper policy, resources, training and monitoring were in place.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a	Local law Base code	NC ZAF600973483
	10.A.B Comply with relevant local, regional a	Local law Base code	NC ZAF600973484

#### ← Code area 9



# Systems and evidence examined to validate this code section

- Existing system in place:
   The facility has prepared an environmental policy and procedure.
   The facility disposes all solid waste in a segregated area with proper level and
- The facility also provides awareness training to all related personnel.
  The Facility has wastage disposal agreement with M/S Rifat Enterprise, located at 10/D, AD:1 Plot D/15, Mirpur, Dhaka-1216, Bangladesh which is valid up to 30 September 2026.

- Evidence examined:
   Facility environment policy and procedure
   Environment management system documents
- Water and energy consumption register
- Wastage register
- Water and energy consumption registerContract for wastage disposal



**Status** 

Open\*

180 days

conformance Local law

Base code

Time given to resolve

**Verification method**Desktop audit

Area of non-compliance/non-

79

## Findings: non-compliances

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

Description

Based on document review and management interviews conducted during this periodic audit, it was observed that corrective action has not yet been taken. The facility has not obtained the required Environmental Clearance Certificate (ECC) for its current location. However, the facility has submitted an application to the Department of Environment (DoE) for the ECC on 26 February 2023.

Description (carried over)

Based on document review & management interview it was observed that, facility didn't have any Environmental Clearance Certificate (ECC) for their location. However, they have already applied to concerned authority (DoE) for the certificate on 26 February 2023.

Corrective and preventative actions

Based on document review and management interviews conducted during this periodic audit, it was observed that corrective action has not yet been taken. The facility has not obtained the required Environmental Clearance Certificate (ECC) for its current location. However, the facility has submitted an application to the Department of Environment (DoE) for the ECC on 26 February 2023.

Corrective and preventative actions (carried over)

It's recommended that, facility should obtain a valid Environmental Clearance Certificate (ECC) from the concerned authority.

Local law reference

Environmental Conservation Rule-2023, Rule 6 (1): Before setting up new industrial establishments of the yellow, orange and red categories mentioned in rule 5 and undertaking the project, first the location clearance and then the environmental clearance shall be obtained from the Directorate:

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No changes in verification method and timeline.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 10.A

Audit company:Audit reference:Start Date:End Date:Intertek BangladeshZAA6001398872025-06-182025-06-18



Status

Open\*

180 days

Time given to resolve

**Verification method**Desktop audit

conformance Local law

Base code

Area of non-compliance/non-

80

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

Description

Based on document review and management interviews conducted during this periodic audit, it was observed that corrective action has not yet been taken. The facility has not obtained the required Environmental Clearance Certificate (ECC) for its process.

Description (carried over)

It was noted through the document review and management interview that the facility didn't have Environmental Clearance Certificate - ECC for their production process.

Corrective and preventative actions

It is recommended that the facility should obtain the updated Environmental Clearance Certificate (ECC) from the concerned authority.

Corrective and preventative actions (carried over)

It is recommended that the facility should obtain the updated Environmental Clearance Certificate (ECC) from the concerned authority.

Local law reference

Environmental Conservation Rule-2023, Rule 5 (1): Classification of industrial establishments and projects for the purpose of granting locational and environmental clearances. (1) For the purpose of granting locational and environmental clearance by the Directorate, industrial establishments and projects shall be divided into the following categories, taking into account the extent of the activities of the industrial establishments or projects and the scope, extent and potential harmful effects on the environment and human health, namely: a) Green, b) Yellow, c) Orange & d) Red.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

No changes in verification method and timeline.

\* PDF generated at 07:10 (UTC) on 23 Jun 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 10.A

Audit company:Audit reference:Start Date:End Date:Intertek BangladeshZAA6001398872025-06-182025-06-18



#### 10.A. Environment 2-Pillar

## **Data points**

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?

No

Does the site have any valid environmental or energy management certificates?

The facility didn't have any valid environmental or energy management certificates.

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No



# **Attachments**









Facility Name.jpg

Facility Main Gate View.jpg

Facility Building View.jpg

Personnel Address (P.A.) System.jpg









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Staircase.jpg

Smoke Detector.jpg

Illuminated Exit Sign.jpg

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Evacuation Plan Map.jpg

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Fire Extinguisher.jpg

Fire Alarm.jpg

Fire Control Panel.jpg

Fire Hose Pipe Cabinet.jpg









Exit Door.jpg

Fire Fighting Equipment.jpg

Fire Alarm Switch.jpg

Designated Fire Fighter.jpg











Fire Hose Pipe Demonstration.jpg





Designated Fire Rescuer.jpg











Medical Room.jpg

First Aid Box.jpg

Designated First Aider.jpg

Toilet Area.jpg

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Solar Panel.jpg

Notice Board.jpg

Generator.jpg

Roof Top.jpg











Electric Power Distribution Box.jpg

Drinking Water Station.jpg

Eye Wash Station.jpg

Dining Hall.jpg











**Grievance Box.jpg** 

Boiler.jpg

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Electric Sub-Station.jpg

Exhaust Fan.jpg

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Jacquard Section.jpg

Finished Goods Area.jpg

Washing Section.jpg

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Mending Section.jpg

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Trimming Section.jpg

Linking Section.jpg

Packing Section.jpg

Finishing Section.jpg

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Rubber insulating mats was not provided in fornt of electrical distribution boards.jpg

Auto knitting (Jacquard) operators were not wearing ear plugs.jpg

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NC Closure Photo-Functional Eye Wash Station.jpg

Signed CAP.pdf

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