




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: 1071005	Sedex Site Reference: (only available on Sedex System)	ZS: 1085542
Business name (Company name):	Apex Textile Printing Mills Limited		
Site name:	Apex Textile Printing Mills Limited		
Site address: (Please include full address)	Chandora, Shafipur, Kaliakoir, Gazipur.	Country:	Bangladesh
Site contact and job title:	Md. Harun Or Rashid- Assistant General Manager (Compliance)		
Site phone:	+8801787668185	Site e-mail:	compliance@apexholdings.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	5 th and 6 th January 2022.		

Audit Company Name & Logo:  SGS Bangladesh Limited	Report Owner (payer): Apex Textile Printing Mills Limited
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

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

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None.

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

Lead auditor: Mohammed Saiful Islam APSCA number: RA 21701603

Lead auditor APSCA status: Registered Auditor (In Good Standing)

Team auditor: Israt Zahan and Md. Mostafizur Rahman Shah

APSCA number: RA 21703278 and RA 21703681.

Interviewers: Mohammed Saiful Islam, Israt Zahan and Md. Mostafizur Rahman Shah

APSCA number: RA 21701603, RA 21703278 and RA 21703681.

Report writer: Israt Zahan

Report reviewer: Ananya Mallick

Date of declaration: 6th January 2022.

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

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) <i>Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.</i>		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>				None observed.
0B	Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	04			NC: <ul style="list-style-type: none"> Machine safety guards were displaced. No building approval plan for few areas. Non-inclusion of few areas in fire license. No coverage of hose pipe in few areas.
4	Child Labour	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
5	Living Wages and Benefits	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>			03	GE: <ul style="list-style-type: none"> Factory management provides attendance bonus BDT 600 per month to all workers. Facility provides medical facility for the workers and their family member.

									<ul style="list-style-type: none"> Facility management provides transport facility (three buses) for the workers who live far from the facility.
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>				None observed.
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				None observed.
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not applicable
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				Not applicable

General observations and summary of the site:

- The factory produces Knit garments. In total 5329 employees work at the site including 681 non-production employees.
- Factory has a policy to endorse at the highest level, covering human rights impacts and issues, and ensures it is communicated to all employees.
- Through plant tour, workers interview and documents review, physical verification/appearance of workers; no evidence of the use of child labour was observed.
- Facility does not engage any forced or bonded labour. In Bangladesh, no prison labour is engaged outside the prison according to the law. Nothing identified during audit. Factory also does not keep any original documents from the workers, noted by the interviewed workers. Workers are free to leave their employer at any time giving required notices.
- Factory treats their workers with respect and dignity; no corporal punishment, threats of violence or other forms of physical, mental, sexual, verbal harassment and abuse are practiced.
- Facility did not discriminate between workers in any manner while selection, pay, promotion and termination. Nothing identified by the documents

verification and nothing reported by the interviewed workers regarding discrimination. The payment and overtime record did not show any discriminatory incidents.

7. There is a trade union has been formed by the workers of the factory. The factory has provided suggestion & complaint box in the toilet area through which workers can give their suggestion / complaints if any.

8. First aid facility and toilet facilities have been found as per legal requirement. First aiders were well known about the first aid issues and fire fighters are well known about the operation of all firefighting equipment and regular training is provided to them regarding this.

9. All workers are getting ID card during their recruitment. All the workers are receiving contract letter.

10. It was verified through document review, factory tour, management interview and employee interview that no Home-working was used by this factory.

11. The factory implemented anti-harsh 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. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory.

12. Workers have received overtime allowance at premium rate (double of the basic). Workers are getting day off on Friday as weekly holiday.

13. All workers were provided with pay slips for each pay period which is in easily understandable language to all workers.

Comments from auditors about Covid-19:

Due to effect of corona virus disease (COVID-19) following measure has been taken by the facility during operation in every day to protect their employees from Corona virus disease (COVID-19):

- a) Checking temperature for each employee while entering in the factory.
- b) Facility management arranged hand washing for the workers.
- c) Daily awareness through public address system.
- d) Ensuring face mask for each employee.
- e) Maintaining same arrangement for the visitors.
- f) Awareness posters were posted in the prominent places.

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

Site Details

Site Details																	
A: Company Name:	Apex Textile Printing Mills Limited																
B: Site name:	Apex Textile Printing Mills Limited																
C: GPS location: (If available)	GPS Address:	Latitude: 24.0345162 Longitude: 90.2228134															
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	<p>Trade Licence No: Licence no. 56815 issued by Kaliakoir Municipality and valid till 30th June 2022.</p> <p>Factory Licence No: Licence no. 12643/Gazipur, issued by Deputy Chief Inspector of Factories and valid till 30th June 2022.</p> <p>Fire Licence No: DD/ Dhaka/ 19047/2005 issued by Bangladesh Fire Service & Civil Defence Authority and expiry date is 30th June 2022.</p>																
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	All kinds of knit items.																
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Apex Textile Printing Mills Limited is located at Chandora, Shafipur, Kaliakoir, Gazipur, Bangladesh. The factory incorporation certified on 2nd June 2004. The total land area is about 696,960 square feet. In addition, total production area is about 455,702 square feet & warehouse is about 12,000 square feet.</p> <p>There are total 4 factories; Apex Textile Printing Mills Limited (Audited facility), Apex Spinning & Knitting Mills Limited (not under audit scope), Apex Lingerie Ltd. (not under audit scope) and Apex Yarn Dyeing Ltd. (not under audit scope) inside the facility premises under same owner.</p> <p>There are 11 buildings and 14 sheds with CETP available in the facility premises. Some areas are used combinedly by the facilities and some areas are used individually. Detailed description of the audited facility is given below: -</p> <table border="1"> <thead> <tr> <th>Building no. 01 (6 storied)</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Ground floor to fifth floor</td> <td>Used by Apex Lingerie Ltd.</td> <td>Not under audit scope</td> </tr> <tr> <td>Roof top</td> <td>Vacant</td> <td>NA</td> </tr> <tr> <td>Is this a shared building?</td> <td>No</td> <td>NA</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>Building no. 02 (4 storied)</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> </tbody> </table>		Building no. 01 (6 storied)	Description	Remark, if any	Ground floor to fifth floor	Used by Apex Lingerie Ltd.	Not under audit scope	Roof top	Vacant	NA	Is this a shared building?	No	NA	Building no. 02 (4 storied)	Description	Remark, if any
Building no. 01 (6 storied)	Description	Remark, if any															
Ground floor to fifth floor	Used by Apex Lingerie Ltd.	Not under audit scope															
Roof top	Vacant	NA															
Is this a shared building?	No	NA															
Building no. 02 (4 storied)	Description	Remark, if any															

	Ground floor to Third floor	Used by Apex Spinning & Knitting Mills Ltd.	Not under audit scope
	Roof top	Vacant	NA
	Is this a shared building?	No	NA
	Building no. 03 (3 storied)	Description	Remark, if any
	Ground floor to 2 nd floor	Used by Yarn Dyeing Ltd.	Not under audit scope
	Roof top	Vacant	NA
	Is this a shared building?	No	NA
	Building no. 04 (7 storied with mezzanine floor)	Description	Remark, if any
	Ground floor	All Over Printing section and Color Kitchen of Apex Textile Printing Mills Limited. Dyeing Finishing section of Apex Spinning & Knitting Mills Ltd.	Shared with another sister concern
	Mezzanine floor	Yarn store of Apex Spinning & Knitting Mills Ltd.	Used by sister concern only
	First floor	Knitting section and Fabrics store of Apex Spinning & Knitting Mills Ltd.	Used by sister concern only
	Second floor	Cutting section, finished fabric store, finished goods store, label printing section of Apex Textile Printing Mills Limited, Finished Garments store of Apex Spinning & Knitting Mills Ltd Finished goods store of Apex Lingerie Limited.	Shared with another sister concern
	Third floor	Sewing section, finishing section, spot removing room, sub accessories store, maintenance room and office of audited factory. Finished Goods store of Apex Lingerie Ltd.	Shared with another sister concern

	Fourth floor	Sewing section, finishing section, needle control room, maintenance room, accessories sub store, Skill incubator (Training room), spot removing room, Printing section, Heat seal area, sample section, maintenance room of audited factory.	Used by audited factory only
	Fifth floor	Sewing section, finishing section, Spot Removing room, Cutting section, Maintenance room. inspection room, Skill Incubator (Training room), sub accessories store, needle control room of audited factory.	Used by audited factory only
	Sixth floor	40% area is used as accessories store, Semi-finished goods store, ring robo section, piping section and rest of 60% area is vacant & used as roof top	Used by audited factory only
	Is this a shared building?	Yes, this building is shared with Apex Spinning and Knitting Mills Limited and Apex Lingerie Limited facilities.	Same owner and same management
	Building no. 05 (2 storied)	Description	Remark, if any
	Ground floor	Workers' dining	Shared with other sister concerns
	First floor	Workers' dining	Shared with other sister concerns
	Roof top	Vacant	
	Is this a shared building?	Yes, building is used as dining for all 04 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)	Same owner and same management
	Building no 06 (4 storied)	Description	Remark, if any
	Ground floor to 4th floor	Mosque	Mosque shared with other sister concerns
	Roof top	Vacant	

	Is this a shared building?	Yes, building used as mosque for all 04 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)	Same owner and same management
	Building no. 07 (03 storied)	Description	Remark, if any
	Ground floor	Health center and Childcare facilities	Health centre shared with other sister concerns
	1 st floor and 2 nd floor	Top management rest room	Shared with other sister concerns
	Roof top	Vacant	NA
	Is this a shared building?	Yes, building used as health center for all 04 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)	Same owner and same management
	Building no 08 (10 storied)	Description	Remark, if any
	Ground floor	Dyeing Finishing, Stenter machine, Sizzling machine under Apex Spinning and Knitting Mills Limited.	Used by sister concern only
	First floor	Cutting and Auto Cutter under Apex Lingerie Limited. Digital printing machine, Print Transfer machine, (Audited facility)	Combinedly used with Apex Lingerie Limited
	Second floor	Carton, raw material store under Apex Spinning and Knitting Mills Limited	Used by sister concern only
	Third floor	Corporate office under Apex Spinning and Knitting Mills Limited	Used by sister concern only
	Fourth floor	Temporary Gray fabric storage under Apex Spinning and Knitting Mills Limited	Used by sister concern only
	Fifth floor	Temporary Grey fabric storage under Apex Spinning and Knitting Mills Limited	Used by sister concern only
	Sixth floor	Temporary finished fabric storage under Apex Spinning and Knitting Mills Limited	Used by sister concern only
	Seventh floor	Temporary accessories storage under Apex Lingerie Limited	Used by sister concern only

	Eight floor	Temporary accessories storage under Apex Spinning and Knitting Mills Limited	Used by sister concern only
	Ninth floor	Temporary finished fabric storage under Apex Lingerie Limited	Used by sister concern only
	Roof top	100% vacant	NA
	Is this a shared building?	Yes, this building is combined used by Apex Spinning and Knitting Mills Limited and Apex Lingerie Limited facilities. Noted few portions of 1st floor is used by audited facility only.	Same owner and same management
	Building no. 09 (8 storied)	Description	Remark, if any
	Ground floor	Dyeing batch (Apex Spinning and Knitting Mills Limited)	Not under audit scope
	First floor	Finished goods store (Apex Spinning and Knitting Mills Limited)	Not under audit scope
	Second floor	Chemical store (Apex Spinning and Knitting Mills Limited)	Not under audit scope
	Third floor	Chemical store (Apex Spinning and Knitting Mills Limited)	Not under audit scope
	Fourth floor	Planning department	Not under audit scope
	Fifth floor	Sample section	Not under audit scope
	Sixth floor	Research and product development	Not under audit scope
	Seventh floor	Conference room	Not under audit scope
	Roof top	Vacant	NA
	Is this a shared building?	No	NA
	Building no. 10 (01 storied)	Description	Remark, if any
	Basement	Fire Hydrant Pump	Shared with other sister concerns
	Ground floor	Fire Command station	Shared with other sister concerns
	Roof top	Vacant	NA

	Is this a shared building?	Yes, this building is combined used by Apex Spinning and Knitting Mills Limited and Apex Lingerie Limited facilities. Apex Yarn Dyeing Limited Apex Textile Printing Mills Limited	Same owner and same management
	Building no. 11 (02 storied)	Description	Remark, if any
	Ground floor	Dissolved air fluctation system	Shared with other sister concerns
	1 st floor	Office, Lab, chemical store, and chemical mixing area	Shared with other sister concerns
	Roof top	Vacant	NA
	Is this a shared building?	Yes, this building is combined used by Apex Spinning and Knitting Mills Limited, Apex Lingerie Limited Apex Yarn Dyeing Limited Apex Textile Printing Mills Limited	Located 50 meters away from the facility.
<p>Shed Details:-</p> <p>Shed 01: Narrow Fabric Dyeing shed under Apex Lingerie Ltd. (not under audit scope).</p> <p>Shed 02: Winding shed under Yarn Dyeing Ltd. (not under audit scope).</p> <p>Shed 03: Boiler, compressor- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)</p> <p>Shed 04: Generator- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)</p> <p>Shed 05: Wastage Store- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)</p> <p>Shed 06: Security Barak- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)</p> <p>Shed 07: Workshop- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)</p> <p>Shed 08: Driver rest and security rest room- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)</p>			

Shed 09: Canteen- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)

Shed 10: Security post - Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)

Shed 11: Trade Union office- Common for all 4 factories (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.)

Shed 12: CCTV monitoring room, Security rest room (Apex Textile Printing Mills Limited, Apex Spinning & Knitting Mills Ltd., Apex Lingerie Ltd., Apex Yarn Dyeing Ltd.).

Shed 13: Compressor of Apex Yarn dying Ltd.

Shed 14: Boiler of Apex Yarn dying Ltd.

In Addition, Facility has Central Effluent Treatment Plant (CETP) for all four facilities which is located 50 meters away from the facility.

Total production capacity is 5,000,000 pieces for garment items per month, 208 Ton for all over print per month and 30,00,000 pieces for screen print per month per month.

Currently 5329 employees are working in the facility. Among them 2184 are male and 3145 are female.

In general, the employees work for 6 days in a week (Saturday to Thursday). Friday is weekly holiday. Regular working hour is 7.45 am to 4.45 pm and 8:00 am to 5:00 pm including 1-hour lunch break from 12:30 pm to 1:30 pm, 12:45 pm to 1:45 pm and 1:00 pm to 2:00 pm with three shifts. Besides, All over print and screen print and Security sections are running in 3 shifts. Shift A starts from 6.00 am to 2.00 pm, shift B starts from 2.00 pm to 10.00 pm and shift C starts from 10.00 pm to 6.00 am.

Facility is paying salary on monthly basis and 100% bank (Rocket banking) account to their employees.

F1: Visible structural integrity issues (large cracks) observed?

☐ Yes

☒ No

F2: Please give details:

This audit has been undertaken by a qualified social auditor and not a structural engineer. As such SGS can only report on any evidence of structural defects or maintenance requirements based on external reports undertaken by local authorities or other licensed bodies. Equally SGS cannot accept any liability for subsequent failures not noted or reported because of their visual checks. The rating above is based on the auditor's opinion of general maintenance and cosmetic soundness of the building based on purely visual Checks.

F3: Does the site have a structural engineer evaluation?

☒ Yes

☐ No

	<p>F4: Please give details:</p> <p>Building construction approval was taken from Kaliakoir Pouroshova dated on 20/5/ 2015. Floor layout permission was taken from Department of Inspection for factories and establishment on 23/2/ 2021.</p> <p>Based on facility's approved building plan review and management interview that the facility did not have building approval plan for first floor and second floor of building-7 which is used as top management rest room from concern authority such as RAJUK/PWD/LGED.</p>
<p>G: Site function:</p>	<p> <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor </p>
<p>H: Month(s) of peak season: (if applicable)</p>	<p>Round the year same.</p>
<p>I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)</p>	<p>Product: All kinds of knit items.</p> <p>Line: 98</p> <p>Process: All over print→ Cutting→ Placement printing→ Sewing→ Finishing (Iron to Packing).</p> <p>Equipment: Rotary Printing machine, Flat bed Printing machine, washing machine, Engrave. machine, Sample Table Dryer, Screen Washing, Loop Steam M/C, Sample Loop Steam. machine, Colour Preparation machine, Plotter Machine, Digitizer Machine, Pat. Cutter M/C, End Cutter machine, Band Knife, Straight Knife, Plain (SN-LST) Auto, Plain (SN-LST), Manual, Plan-Vertical, S/N-Chain Stitch, Over Lock (04 Thread,05 Thread), Flat Lock, Feed of ARM, PMD, DFB, SCALOOP, BARTACK, VELCO ATTACH, BUTTON HOLE, BUTTON STITCH 1,3-STEP ZIG ZAG, Snap Attach machine, Fusing machine, Needle Detector machine, Thread Sucking machine, Vacuum Iron Table, Auto Dryer machine, Hand Dryer machine, Curing machine, Heat Press machine, Stretching machine, Flock Printing machine, Ex-poser machine, Sucker Machine, Screen Dryer M/C, Single Needle machine, Over Lock machine, Flat Lock machine, ZIG ZAG machine, BARTACK machine, Button Hole machine, Button Stitch, Kansai machine, Chain Stitch, Velcro machine, feed of ARM, Plain machine, Rib Cutter machine, Knife Shan machine, Roller machine, Type Cutter machine etc.</p>

	Total set = 3830 set.
J: What form of worker representation / union is there on site?	<input checked="" type="checkbox"/> Union (Name: Apex Holdings Garments Ltd. Sromic and Karmachari Union) <input type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: All over printing and Placement printing sections are running in 3 shifts. Shift A starts from 6.00 am to 2.00 pm, shift B starts from 2.00 pm to 10.00 pm and shift C starts from 10.00 pm to 6.00 am.
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation NA, the facility does not provide any dormitory and there is no legal requirement.
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers NA, the facility does not provide any dormitory and there is no legal requirement.
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No N1: If no, please give details NA, the facility does not provide any dormitory and there is no legal requirement.

Audit Parameters			
A: Time in and time out	Day 1 Time in: 8:50 am Day 1 Time out: 6:30 pm	Day 2 Time in: 8:40 am Day 2 Time out: 3:30 pm	A5: Day 3 Time in: NA A6: Day 3 Time out: NA
B: Number of auditor days used:	03 Auditors used on 1 st day and 02 Auditors used on 2 nd day		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 04 weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Md. Harun Or Rashid- Assistant General Manager (Compliance)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	23 rd & 24 th February, 2021.		
J: Previous audit type:	Periodic		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable as Union representative was present during the audit. Moreover, there is no need to form participation committee if there is a Trade union in the facility (Translated). [Amendment of 2018, section-32 (12), Labour Law 2006].		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	Not Applicable.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	2184 (including management)	0	0	0	0	0	0	2184 (including management)
Worker numbers – female	3145 (including management)	0	0	0	0	0	0	3145 (including management)
Total	5329 (including management)	0	0	0	0	0	0	5329 (including management)
Number of Workers interviewed – male	31	0	0	0	0	0	0	31
Number of Workers interviewed – female	55	0	0	0	0	0	0	55
Total – interviewed sample size	86	0	0	0	0	0	0	86

A: Nationality of Management	Bangladeshi	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: Bangladeshi B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, please describe how this may vary during peak periods: Not applicable as facility does not have any peak season.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 100% C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration (management information)	D: _____% workers on piece rate D1: _____% hourly paid workers D2: 100 % salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: <u>100%</u> monthly paid D6: _____% other D7: If other, please give details	

Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	50 employees (10 groups of 5 employees, no. of male -25 & female- 25)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 06	D2: Female: 30
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	No issue was identified during worker interview	
I: What did the workers like the most about working at this site?	Good working environment, on time payment, Good Health & Safety Condition, Attendance bonus.	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Comfortable	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details:		
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk		

Total 86 employees selected for interview. Among them 36 employees were selected for individual interview and total 50 employees in 10 groups (5 employees in each group) were selected for the group interview. All the interviewees were favourable with the management.

The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and they are provided wages as per their agreement. They felt free to leave this employer and understood the notice period required. They facility management treated them with respect. They can complain directly to their supervisors or line manager and felt free to give their general concerns to their Trade Union representative.

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

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

Trade Union member interviews were conducted privately in a separate place. During opening meeting Trade Union representatives were present and auditors clearly explained them about the audit, audit process, necessity of audit and audit criteria in local language. They replied naturally regarding their responsibilities as Trade Union President, member and they also informed that they can easily carryout their daily job without any difficulties. Trade Union members meeting are held on regular basis (Last meeting was held on 9/10/2021. They also stated that they could give suggestions on all parts of the site's practices.

O: Attitude of managers:

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

Management of the factory was positive and supportive during the whole audit. Md. Harun Or Rashid- Assistant General Manager (Compliance) was the key person of the compliance team and for compliance with the Code, legal requirements, development of policies and its implementation, monitoring & control. In this backdrop, management had comprehensive knowledge, as assumed, about audit requirements and scope; e.g. ETI Base Code, local laws etc. The factory management was found to be cooperative throughout the audit.

Audit Results by Clause

0A: Universal Rights covering UNGP

0A: Universal Rights covering UNGP

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

0.A. Guidance for Observations

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility implements and maintains systems for delivering compliance to this Code.
2. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the Code.

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

Details:

1. Facility Management Interview.
2. Document review (Policy record review and training register review).
3. Workers Interview.

Any other comments: Nil

A: Policy statement that expresses commitment to respect human rights?

☒ Yes

☐ No

A1: Please give details: Factory has policy which authorized at the highest-level human rights impacts and issues, and ensure it is communicated to all Workers.

B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Md. Harun Or Rashid Job title: Assistant General Manager (Compliance)
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory management has provided complaint box in worker's toilet area. Through the complaint box workers can raise their suggestion and complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details: NA.
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: All employee information and personnel files are kept locked away in the human resources department and it is only viewed by the HR department.

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

Good examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not applicable

Measuring Workplace Impact

Measuring Workplace Impact Table

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 2020 __1.9__ %	A2: This year: 2021 __2__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2020 __4__ %	C2: This year: 2021 __4.2__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	4%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: Factory used prescribed form of Accident register for recording accidents/injuries, noted through documents review. Moreover, correct reflection of injury analysis and root cause for corrective action was found.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2020 Number: 0.167 %	F2: This year: 2021 Number: 0.20%
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0.055%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 2020 0.185%	H2: This year: 2021 0.167
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ____0____% workers	J2: 12 months ____0____% workers
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0: Management systems and Code Implementation

0B: Management system and Code Implementation

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The factory communicates their code of conduct through training program and notice board regularly including company's own COC.
2. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the Code.
3. Facility communicates ETI code of conduct to their suppliers and where reasonably practicable extends the principles of this ethical code through their supply chain.

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

Details:

1. Document review (Policy record review and training register review).
 2. Facility Management Interview.
 3. Workers Interview.
 4. Plant tour
- Any other comments: Nil

Management Systems:

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

- ☐ Yes
☒ No

A1: Please give details: Site has not been subjected to any fines in the last 12 months.

<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: here is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.</p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>There is effective policy and procedures found to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.</p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse.</p> <ul style="list-style-type: none"> ➤ Last mid-level management training was held on 29/11/2021 with 16 participants. ➤ Last orientation training for workers was held on 29/12/2021 with 01 participants.
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Managers and workers have received training on the standards for forced labour, child labour, discrimination, harassment & abuse and factory preserved training records as evidence. During interview workers were found aware about the policies and procedures.</p>
<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: Facility has conducted amfori BSCI audit on 12th & 13th December, 2021.</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility has an independent Human Resources Department and Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for this department.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Facility has a senior person and Md. Harun Or Rashid - Assistant General Manager (Compliance) is put into action of the Code.</p>

I: Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Factory has the policy to ensure all worker information confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: There is effective policy and procedures found to ensure confidential information is kept confidential.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility conducts risk assessment on regular basis. Last risk assessment conducted on 1 st February 2021.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: Facility conducts risk assessment on regular basis. Last risk assessment conducted on 1 st February 2021 and last training on risk assessment conducted on 22/12/2021 with 32 participants.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: Facility management communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Factory was established in its own land. All required documents were available.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: Facility have system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: Facility has a written policy and procedures regarding to land rights with due diligence of obtain free, prior and informed consent.

Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: NA
R: Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: NA
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input type="checkbox"/> No S1: Please give details: NA

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

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

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

1: Employment is Freely Chosen

1: Freely Chosen Employment

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

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility does not hold main copy of any legal document of the workers during recruitment. The factory maintains only copies of all hiring documents such application, date of birth certificates, school certificates etc.

2. The workers are free to leave the work place If workers want to leave their job, they are free to do so, as long as they are fulfilled their obligations agreed under their appointment letter/agreement.

3. Facility displayed overtime policy stating that over time work is voluntary.

4. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the Code.

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

Details:

1. Facility Management Interview

2. Document review (Recruitment policy, working hour policy, workers' personal file, copy of national ID, date of birth certificates, school certificates, security guard's job description etc.)

3. Workers Interview

Any other comments: Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:

D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding:
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding:
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: Employees are free to leave at the end of work day noted through interview.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Facility has policy & procedure on force labour, bonded labour and they understand the risk also communicate with their supply chain.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Facility has a policy against forced/trafficked labour which maintained by the facility.

Non-compliance:

1. Description of non-compliance:

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

Local law and/or ETI requirement: Not Applicable

Recommended corrective action: Not Applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

Observation:

Description of observation: None Observed
Local law or ETI requirement: Not Applicable
Comments: Not Applicable

Objective evidence observed:
Not Applicable

Good Examples observed:

Description of Good Example (GE):
None Observed

Objective evidence observed:
Not Applicable

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

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

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

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

- Workers can raise their concerns through Trade union, telephone, complaint box, meeting and their team leader or above.
- Factory has a policy where is no restriction imposed to the workers' formation of trade union.
- There is a registered Trade Union in the facility, named (Apex Holdings (Garments) Ltd. Sromic and Karmachari Union). Last meeting with the Trade Union and management of facility was held on 9/10/2021.
- Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the Code.

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

Details:

- Facility management interview.
- Worker interview.
- Complaint box register (Suggestions from the complaint box and actions taken).
- Trade Union record review.
- Grievance handling policy & procedure

Any other comments: Nil

A: What form of worker representation/union is there on site?

- ☒ Union (name) **Apex Holdings (Garments) Ltd. Sromic and Karmachari Union**
- ☐ Worker Committee
- ☐ Other (specify)
- ☐ None

B: Is it a legal requirement to have a union?

- ☐ Yes
- ☒ No
- However, facility has registered Trade Union.

C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No When there is no Trade Union then Participation Committee is mandatory in the facility. For this facility PC committee is not required as they have registered Trade Union.	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Facility has formed a safety committee. (Workers 6 & management 6) total 12. D2: Is there evidence of free elections? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NA	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Trade Union meeting was held as per law on regular basis. Last meeting was held on 9/10/2021.	
F: Name of union and union representative, if applicable:	Apex Holdings (Garments) Ltd. Sromic and Karmachari Union Mr. Habibur Rahman – President of Trade Union.	F1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	NA	G1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	All workers were aware about their representatives.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 15 th November 2020.
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility workers know, what kind of topic can be raised with their representatives.	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: 01	

L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Trade Union meeting was held as per law on regular basis. Last meeting was held on 9/10/2021. Topics of last meeting are given below- 1. About increasing worker's attendance. 2. Regarding festival leave (Durga Puja) 3. Regarding worker's behaviour. 4. Regarding compliance audit. 5. About next date of meeting. 6. About Covid-19 awareness. 7. Others. Meeting minutes were communicated through notice board.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If Yes , what percentage by trade Union/worker representation	M1: <u>5</u> % workers covered by Union CBA	M2: <u>95</u> % workers covered by worker rep CBA
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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

Observation:	
Description of observation: None Observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

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

3: Working Conditions are Safe and Hygienic

3: Working Conditions are Safe and Hygienic

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

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

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility has formed safety committee. Total number of the committee member is 12; 6 members are from management and 6 members are from workers.
2. Factory posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers.
3. Emergency lights were installed with IPS back up.
4. Sufficient first aid kits stocked are provided in workshops. Total no. of first aid box 78 & first aider was found 521 persons.
5. Workers receive regular and recorded health & safety training. Last Health & Safety training was provided on 6th February 2021 with 21 participants.
6. Facility has total 1595 fire fighters. Among them 1040 were trained from Bangladesh Civil Defence services.
7. Last refresher firefighting training provided on 23/12/2021 with 25 participants by fire safety officer.
8. Facility conducts evacuation drill on monthly basis. Last evacuation drill was conducted on 21/10/2021 with 5951 participants (Day fire drill) which was conducted by FSCD and Last night fire drill was conducted on 12/9/2021 with 130 participants.
9. PPE training provides regularly. Last PPE training was provided on 7/12/2021 with 45 employees.
10. First aid training provided regularly to the first aider. Last first aid training was conducted on 5/12/2021 with 27 participants.
11. Workers' toilets are segregated by gender, adequate number as per law, wash facility provided. Total no. of male toilets 111 and female toilets 131.
12. The facility has done maintenance of the machines on regular monthly basis confirmed through the documents reviewed.
13. Factory has regular fire equipment maintenance system.
14. Facility has provided one dining room in the facility for the workers, with the sitting capacity of 750 person at a time.
15. Mr. Sher Ali, Sr. Executive- Health and safety along with Md. Ariful Islam- Jr. Executive-Fire & Safety is responsible for health and safety.

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

Details:

1. Plant tour.
2. Document review (Training record review, daily machine maintenance register, electrical installation checking register, injury register, fire drill register, fire equipment's checking register).
3. Facility management interview.
4. Worker interview.

Any other comments: Nil

<p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly and health & safety issues. Facility has communicated this procedure through orientation training confirmed from worker interview.</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: All Policies and procedures are included in workers manual or handbook.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: Based on facility's approved building plan review and management interview that the facility did not have building approval plan for first floor and second floor of building-7 which is used as top management rest room from concern authority such as RAJUK/PWD/LGED.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Visitors are provided personal protective equipment where required.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Medical Facility is available for the workers and it meets the local legal requirements. Male and female rooms in medical are segregated with sufficient numbers of beds.</p>

F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: 1. Factory has medical facility available with a fulltime Doctor named Dr. Makfiratur Rahman Tripty, Dr. Md. Sajjadur Rahman, Dr. Urmee Akter Nurse named Most. Razia sultana, Suborna Mondol, and Tania Khatun, Medical Assistant named Mr. Abdul Alim, Md. Rakibul Islam, Ms. Babita and first aid supplies are easily accessible and available. 2. Total no. of first aid box – 78 & internal first aider was found -521 persons responsible for first aid.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: Facility provides buses for workers which have fitness certificates. Though this is not mandatory by law.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No H1: Please give details: Dormitory facility is not provided to the workers and it is not required by law.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Facility conducts risk assessment on regular basis. Last risk assessment conducted on 1st February 2021 and last training on risk assessment conducted on 22/12/2021 with 32 participants.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Facility meets legal obligation of disposing natural resource.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Facility does not use any banned chemical.

Non-compliance:

1.. Description of non-compliance:

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

Issue title: Machine safety guards were displaced.

Description of non-compliance:

During site tour, following machine safety related issues were noted –

Objective evidence observed:
(where relevant please add photo numbers)

1. Plant tour (NC picture no. 1, 2 & 3)

Approximately 10% eye guard of flat Lock and overlock machines were displaced in sewing section during work at 3rd, 4th, and 5th floor of Building-04.

Local law and/or ETI requirement:

In accordance with ETI Base Code 3.1 and Bangladesh Labour Law 2006, Section 63 (1) D (3):

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

Bangladesh Labour Law 2006, Section 63 (1) D (3): Fencing of machinery. – (1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely D(iii) every dangerous part of any machinery.

Recommended corrective action: It is recommended that facility management should ensure machine guards to all relevant machines.

Action By: Md. Harun Or Rashid – Assistant General Manager (Compliance)

Time frame: 30 days.

2. Description of non-compliance:

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

Issue title: No building construction approval plan for few areas.

Description of non-compliance:

Based on facility's approved building plan review and management interview that the facility did not have building approval plan for first floor and second floor of building-7 which is used as top management rest room from concern authority such as RAJUK/PWD/LGED.

Local law and/or ETI requirement:

In accordance with ETI Base code 3.1 and Building Construction Act 1952, Section-3:

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

Building Construction Act 1952, Section-3:

2. Plant tour and document review.

Notwithstanding anything contained in any other law for the time being in force, or in any agreement, no person shall, without the previous sanction of an Authorized Officer, construct or re-construct or make addition or alternation to any building, or excavate or re-excavate any tank within the area to which this Act applies;

Recommended corrective action: It is recommended that the facility should have approved building plan for the mentioned building.

Action By: Md. Harun Or Rashid – Assistant General Manager (Compliance)

Time frame: 60 days.

3. Description of non-compliance:

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

Issue title: Non-inclusion of few areas in fire license.

Description of non-compliance:

Based on plant tour, fire license review and management interview, it was noted that factory did not included first floor and second floor of building-7 which is used as top management rest room in their fire license. Total area is approximately 6462 square feet.

ETI or Local Law requirement:

In accordance with ETI Base code 3.1 and Fire Prevention and Extinction Act-2003, section 4 (1):

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

Fire Prevention and Extinction Act-2003, section 4 (1): It is required to get a license from the Director General of Bangladesh Fire Service and Civil Defence if any person wants to use any building or place as warehouse or workshop.

Recommended corrective action: It is recommended that the facility should include all floors in the fire license.

Action By: Md. Harun Or Rashid – Assistant General Manager (Compliance)

Time frame: 60 days.

4. Description of non-compliance:

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

3. Plant tour and documents review.

4. Plant tour

Issue title: No coverage of hose pipe in few areas.

Description of non-compliance:

No water hose pipe coverage was found at Building 11 (ground floor is used as dissolved air flocculation system and first floor is used as office, lab, chemical store, and chemical mixing area) noted through plant tour. Total area is approximately 8144 square feet.

Local law and/or ETI requirement:

In accordance ETI Base code 3.1 and Bangladesh Labour Rules, 2015, rule 55 (1: d).

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

Bangladesh Labour Rules, 2015, rule 55 (1: d).

A hose reel should be set up in a place approved by the inspector as per the specification of the fire service department on each floor for each 850 sqmt space of each building and there will be the arrangement of uninterrupted water supply in it and it should be tested at least once a year. But provided that the inspector general can relax the compliance of the provisions of this paragraph in case of any factory after recording it being confirmed about the alternative measure of the fire fighting.

Recommended corrective action: It is recommended that the factory management should ensure all the areas of the facility is under hose pipe coverage.

Action By: Md. Harun Or Rashid – Assistant General Manager (Compliance)

Time frame: 60 days.

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed:

Not Applicable

4: Child Labour Shall Not Be Used

4: Child Labour Shall Not Be Used

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ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current systems:

Facility established a policy which discourages the employment of child labour and no child labour found in the factory during the audit. Factory has strong recruitment process to verify the workers age. 86 sampled workers' personal files were provided for review. In addition, every worker's file includes a bio-data sheet, a recent photo, age proof records (copy of birth registration certification, national ID card). Moreover, if there is any doubt regarding any one's age factory's registered doctor certifies his/her age. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the code.

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

Details:

1. Policy review
2. Document review
3. Management interview
4. Worker interview
5. Factory tour

Any other comments: Nil.

A: Legal age of employment:	14 years (With some limitation as per local law)
B: Age of youngest worker found:	21 years
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, give details

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

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

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

5: Living Wages are paid

5: Living Wages are Paid

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

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ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility is providing local legal minimum wage BDT 8000/month for all the employees.
2. Time keeping system is electronic.
3. All employees 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.
4. Each employee was given a pay slip and signed for their wages.
5. Employees are aware of their minimum wage.
6. Wages have been recorded according to documents checked.
7. Mr. Md. Harun Or Rashid – A.G.M (Compliance) is responsible for the management of this code.

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

Details:

1. Document review (wage sheet review, workers' personal file, bonus payment sheet review, maternity register review, wage & benefit policy etc.)
 2. Worker interview
 3. Management interview
- Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

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

None Observed

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable

Local law and/or ETI requirement: Not Applicable

Recommended corrective action: Not Applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not Applicable

Comments: Not Applicable

Objective evidence observed:

Not Applicable

Good Examples observed:

Description of Good Example (GE):

1. Facility management provides BDT 600 per month to all workers as attendance bonus.
2. Facility management provides medical facility for the workers and their family member.
3. Facility management provides transport facility (three buses) for the workers who living far away from the facility.

Objective Evidence Observed:

Document review, workers and management interview,

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day and 48 hours per week.	A1: 8 hours/ day 48 hours/ week	A2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 2 hours per day and 12 hours per week. However, an adult worker may work for more than 8 (eight) hours in a day or 48 (forty-eight) hours in a week, provided that the total hours of work of an adult worker shall not exceed 60 (sixty) hours in any week and on the average 56	B1: Maximum OT hours found 2 hours/ day and 12 hours/ week in November, 2021 (current month), April 2021 (random month) and January 2021 (random month)	B2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA

	<p>(fifty-six) hours per week in any year.</p> <p>Government has exempted section 100 and 102 of the Bangladesh Labour Law-2006 publishing a Gazette notification in August 2011 as per section 324 Bangladesh Labour Law-2006 for 06 months relaxing daily overtime hours. In accordance with the Clause/Condition No. – 3 of this notification, no worker shall work more than 04 hours of overtime in any day without his/her consent.</p> <p><u>Exception for 06 months:</u> This exemption has been extended several times in last few years and latest extension was on October 27, 2021 and it will be in effect from 17 October 2021 to 16 April 2022.</p>		
<p>C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: (As per Garments Gadget 2019). BDT. 8000 per month (Basic BDT 4100, House rent 50% of the Basic which is BDT.2050, Medical allowance BDT. 600, Conveyance allowance. BDT.350, Food Allowance BDT.900.) For Grade 7 (Assistant operator).</p>	<p>C1: BDT 8000 / month</p>	<p>C2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>
<p>D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</p>	<p>Legal minimum: 200% of the basic wage rate per hour.</p>	<p>D1: 200% of the basic wage rate per hour.</p>	<p>D2: <input type="checkbox"/> Yes <input type="checkbox"/> No NA</p>

Wages analysis:

Wages analysis: (Click here to return to Key Information)																																																																
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																																																															
A1: If No , why not?	NA																																																															
B: Sample Size Checked <i>(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)</i>	86 attendance records and payroll records from November 2021 (Current month). 86 attendance records and payroll records from April 2021 (random month). 86 attendance records and payroll records from January 2021 (random month).																																																															
C: Are there different legal minimum wage grades? If Yes , please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: If Yes, please give details: The Government has announced the new pay structure which was implemented from 1st December 2018 for the workers of the Garments Industries. The Gazette Notification has been published on 25th November 2018 and amendment was done on 24 January 2019. There are two separate pay structures; for the garment workers (Schedule A), For the staff (Schedule B). Schedule A is as follows: <table border="1"> <thead> <tr> <th>Grade</th> <th>Monthly basic wage</th> <th>Housing rent 50% of the basic</th> <th>Medical allowance</th> <th>Conveyance allowance</th> <th>Food subsidy</th> <th>Gross monthly wage</th> </tr> </thead> <tbody> <tr> <td>Grade 1</td> <td>Tk.10938</td> <td>Tk.5469</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.18257</td> </tr> <tr> <td>Grade 2</td> <td>Tk.9044</td> <td>Tk.4522</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.15416</td> </tr> <tr> <td>Grade 3</td> <td>Tk.5330</td> <td>Tk.2665</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.9845</td> </tr> <tr> <td>Grade 4</td> <td>Tk.4998</td> <td>Tk.2499</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.9347</td> </tr> <tr> <td>Grade 5</td> <td>Tk.4683</td> <td>Tk.2342</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.8875</td> </tr> <tr> <td>Grade 6</td> <td>Tk.4380</td> <td>Tk.2190</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.8420</td> </tr> <tr> <td>Grade 7</td> <td>Tk.4100</td> <td>Tk.2050</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.8000</td> </tr> <tr> <td>Apprentice</td> <td>Tk.2750</td> <td>Tk.1375</td> <td>Tk.600</td> <td>Tk.350</td> <td>Tk.900</td> <td>Tk.5975</td> </tr> </tbody> </table>	Grade	Monthly basic wage	Housing rent 50% of the basic	Medical allowance	Conveyance allowance	Food subsidy	Gross monthly wage	Grade 1	Tk.10938	Tk.5469	Tk.600	Tk.350	Tk.900	Tk.18257	Grade 2	Tk.9044	Tk.4522	Tk.600	Tk.350	Tk.900	Tk.15416	Grade 3	Tk.5330	Tk.2665	Tk.600	Tk.350	Tk.900	Tk.9845	Grade 4	Tk.4998	Tk.2499	Tk.600	Tk.350	Tk.900	Tk.9347	Grade 5	Tk.4683	Tk.2342	Tk.600	Tk.350	Tk.900	Tk.8875	Grade 6	Tk.4380	Tk.2190	Tk.600	Tk.350	Tk.900	Tk.8420	Grade 7	Tk.4100	Tk.2050	Tk.600	Tk.350	Tk.900	Tk.8000	Apprentice	Tk.2750	Tk.1375	Tk.600	Tk.350	Tk.900	Tk.5975
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D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	D1: If No , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above	E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> BDT 8000 / month.	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: 6.54 % of workforce earning minimum wage F3: 93.46 % of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i> Facility management provides BDT 600 per month to all workers as attendance bonus.		
H: What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labour Law, 2006, factory may deduct wages for un-authorized absence, for fines, housing facility, advance payments, loans, income tax, provident fund, etc.		
I: Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Please list all deductions that have been made.	1. Unauthorised absence 2. Revenue Stamp 3. Provident fund 4. Loan against provident fund Please describe: Facility deducts above only.
		I2: Please list all deductions that have not been made.	1. Fines, 2. Housing facility, 3. Advance payments, 4. Income tax. Please describe: Facility does not deduct the above mention factors.
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

<p>K: Were any inconsistencies found? (if yes describe nature)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>K1: Type</p> <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:
<p>L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>L1: Please give details:</p> <p>Workers' time record was consistent with provided documents.</p>
<p>M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i> </p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>M1: Please specify amount/time: Factory did not define living wages as it is not required by law. However, factory is providing the minimum wage as Minimum Wages Gazette for Ready made Garments Sector published on 24th January 2019".</p>
<p>M2: If yes, what was the calculation method used.</p>		<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: NA
<p>N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>N1: Please give details: Facility management annually reviewed the wages as per local law. Facility increases minimum 5% on basic wages as increment for workers of all grades annually.</p>
<p>O: Are workers paid in a timely manner in line with local law?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>All workers are paid within 7th working days of the completion of month.</p>
<p>P: Is there evidence that equal rates are being paid for equal work:</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>P1: Please give details: Through factory policy review, payroll records review and employees' interview, it is confirmed that equal rates are being paid for equal work.</p>
<p>Q: How are workers paid:</p>		<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer (100% Rocket banking) <input type="checkbox"/> Other

	Q1: If other, please explain:
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6: Working Hours are not Excessive

6: Working Hours are not Excessive

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

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

ETI

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

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

Noted through working hour policy review that facility has implemented working hour as per law. Facility has maintained working hour related documents accurately. No inconsistency was identified during document review.

1. Standard working hours found 48 hours in the facility.
2. Through employees' interview it was noted that they were aware about voluntary overtime policy.
3. As per the company policy all overtime will be compensated at a premium rate (200% of basic wage).
4. Casual leave, sick leave, festival leave was provided as per local law.
5. Md. Harun Or Rashid Assistant General Manager (Compliance) is responsible for daily attendance, manpower reports, absenteeism, salary administration, leave, promotion etc.

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

Details:

1. Employee interview.
2. Payroll records.
3. Job card records.
4. Production records.
5. Working hour and overtime hours policies & procedures etc.
6. Management interview.

Any other comments: Nil.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements ☐ NC against Local Law

☐ NC against customer code:

None observed

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

Description of observation: None Observed

Local law or ETI requirement: Not applicable

Comments: Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE): None Observed

Objective Evidence Observed:

Not Applicable

Working hours' analysis

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)			
Systems & Processes			
A. What timekeeping systems are used: time card etc.	Describe: Electronic (Proximity card) time keeping system.		
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details		
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:	
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate:	
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time
		<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:	
		NA	
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: NA	
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	Maximum number of days worked without a day off (in sample):		
	8 days (in the month of April 2021)		
	Facility was open on 02/04/2021 which was adjusted with festival holiday (Eid - Ul Fitr) with concern of Trade Union members and workers.		

Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: NA
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 52 Hours in the month of November 2021 (Current Month) 50 Hours in the Month of April 2021 (Random Month) 50 Hours in the Month of January 2021 (Random Month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
K: Approximate percentage of total workers on highest overtime hours:	13%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Overtime works found voluntary confirmed through worker interview, contract letter & employment agreement papers review.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: Facility has a policy to pay 200% of basic per hour for overtime work.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	N1: If yes, please describe % of workers & frequency: All workers who work overtime get premium rate per month.

<p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p>	<div> <input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other </div> <div>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</div> <div>NA</div>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<div> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) </div> <div>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</div> <div>Not Applicable</div>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<div> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Q1: If yes, please give details: </div>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<div> <input type="checkbox"/> Yes <input type="checkbox"/> No Not Applicable </div>

7: No Discrimination is practiced

7: No Discrimination is Practiced

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

ETI

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

Current Systems and Evidence Examined

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

Current systems:

1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
2. No gender discrimination was found in the facility; both female and male employees were distributed in all types of work.
3. The facility provides the same wage amount to male/female employees of the same rank.
4. No complaint or records found for pregnancy test.
5. There is no restriction for formation of trade union in the facility.
6. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the code.

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

Details:

1. Management interview
2. Worker interview
3. Local and national law
4. Personal files
5. Compensation records
6. Termination & retirement records
7. Training records

Any other comments: Nil.

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: 89% A2: Female 11%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	01 woman recruited as Technical Manager.
C: Is there any evidence of discrimination based on race, caste,	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation

national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	<input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found C1: Please give details: NA
---	---

Professional Development	
A: What type of training and development are available for workers?	Workers receive regular health and safety training, Such as- <ul style="list-style-type: none"> ➤ Last Health & Safety training was provided on 6th February 2021 with 21 participants. ➤ Last firefighting training provided on 23/12/2021 with 25 participants by fire safety officer. ➤ Last PPE training was provided on 7/12/2021 with 45 employees. ➤ Last first aid training was conducted on 5/12/2021 with 27 participants.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details:
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Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None Observed. Local law and/or ETI requirement: Not Applicable. Recommended corrective action: Not Applicable.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Not Applicable.

Observation:	
Description of observation: None Observed. Local law or ETI requirement: Not Applicable. Comments: Not Applicable.	Objective evidence observed: Not Applicable

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

8: Regular Employment Is Provided

8: Regular Employment Is Provided

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

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ETI

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility provides ID card for all workers in the time of recruitment.
2. Factory maintains service books for all workers.
3. There is no home working from the site.
4. All workers are getting appointment letter in local language.
5. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the code.

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

Details:

1. Management interview
2. Worker interview
3. Local and national law
4. Workers' personal files and service books
5. Policies and procedures
6. Wage sheets

Any other comments: Nil

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

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

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

Responsible Recruitment

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

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

Migrant Workers:		
<p>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</p>		
A: Type of work undertaken by migrant workers:	No migrant workers employed by the factory.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: B2: Total number of (outside of local country) recruitment agencies used: No migrant workers employed by the factory.	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA. No migrant workers employed by the factory.	C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: If yes, number and example of roles: NA	

workers, temporary and/or seasonal workers)

NON-EMPLOYEE WORKERS

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

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
A: Number of agencies used (average):	A1: Names if available: NIL
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA

D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details:NA
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details:NA

Contractors: <i>Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	NA
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA
D: If Yes , please give evidence for contractor workers being paid per law:	NA

8A: Sub-Contracting and Homeworking:

8A: Sub-Contracting and Homeworking

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

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

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

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

Note to auditor on homeworking:

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

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

Current Systems and Evidence Examined

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

Current systems:

Noted through management interview and documents review that, facility did not have any subcontract process for production purpose. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the code.

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

If any processes are sub-contracted – please populate below boxes

NIL	NIL	NIL
NIL	NIL	NIL
NIL	NIL	NIL

Details:

1. Document review.
2. Management interview
3. Facility tour.
4. Worker interview.

Additional information: Nil

Non-compliance:

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

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: NA
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details: NA
C: Number of sub-contractors/agents used:	0
D: Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details: Facility maintains a sub-contracting policy
E: What checks are in place to ensure no child labour is being used and work is safe?	NA

Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details: NA		
B: Number of homeworkers	B1: Male: NA	B2: Female: NA	Total: NA
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
			NA
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	NA		
F: What processes are carried out by homeworkers?	NA		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:NA		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No NA		

9: No Harsh or Inhumane Treatment is allowed

9: No Harsh or Inhumane Treatment is Allowed

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

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: There is an open channel for all at the facility which anybody can report to management about any act properly or corruptly, or to accept or give a bribe or gift and health & safety issues.
B: If Yes , are workers aware of these channels and have access? Please give details.	Factory has communicated this procedure through orientation training confirmed from worker interview.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Factory has fixed some complaint boxes in workers' toilet area. No complaint records found regarding physical abuse or harassment.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Facility has grievance mechanism for the workers.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: If no, please give details: Facility has grievance mechanism for the workers.
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No I1: If yes, please give details
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Current Systems and Evidence Examined

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

Current systems:

1. The facility has established anti-harsh 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.
2. Through the facility management and employee interview, it was noted that no physical or verbal abuse happened in the facility.
3. There is an internal process for grievance, which is through grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the employee in question.
4. Mr. Md. Harun or Rashid- Assistant General Manager (Compliance) is responsible for ensuring compliance with this code and human rights.

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

Details:

1. Policy review
2. Document review
3. Management interview
4. Worker interview
5. Factory tour

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

- ☐ NC against ETI/Additional Elements
☐ NC against Local Law
☐ NC against customer code: None observed

Local law and/or ETI /Additional Elements requirement: Not applicable

Recommended corrective action: Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:

Description of observation: None Observed

Objective evidence observed:

Local law or ETI requirement: Not Applicable Comments: Not Applicable	Not Applicable
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Good Examples observed:	
Description of Good Example (GE): None Observed	Objective Evidence Observed: Not Applicable

10 A: Entitlement to Work and Immigration

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

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

Additional Elements

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

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

Current Systems and Evidence Examined

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

Current systems:

It was noted through documents review and workers interview that there are no agency staffs, employment agencies and immigration workers in the factory. Md. Harun Or Rashid - Assistant General Manager (Compliance) is responsible for compliance with the code.

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

Details:

1. Management interview
2. Worker interview
3. Employment records
4. Appointment letter
5. Personal files

Any other comments: Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None observed.

Local law and/or ETI /Additional Elements requirement: Not Applicable.

Recommended corrective action: Not Applicable.

Objective evidence observed:

(where relevant please add photo numbers)

Not Applicable.

Observation:	
Description of observation: None observed. Local law or ETI/Additional Elements requirement: Not Applicable. Comments: Not Applicable.	Objective evidence observed: Not Applicable.

Good examples observed:	
Description of Good Example (GE): None observed.	Objective Evidence Observed: Not Applicable.

10 B 2: Environment 2-pillar

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. Facility has an environmental policy which cover all the System and comply the legal requirement.
2. Factory surrounding environment found acceptable.
3. Factory has waste management policy regarding solid as well as hard waste.
4. Mr. Anwar Hossain- SR. Executive EMS & ECR look after Environmental Issues.
5. Facility provided environmental awareness training to employees and workers. Last environmental awareness training was held on 7/12/2021 with 41 persons.
6. Facility has conducted Environmental Impact Assessment (EIA) from third party on August 2020.
7. Facility assessed noise level, air emission, temperature and humidity on 26/05/2021 from third party and test result was found within acceptable limit.

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

Details:

1. Document review
2. Factory tour
3. Management interview
4. Air emission & noise level test review

Any other comments: Nil

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

Observation:	
Description of observation: None observed. Local law or ETI/Additional Elements requirement: Not Applicable. Comments: Not Applicable.	Objective evidence observed: Not Applicable.

Good examples observed:	
Description of Good Example (GE): None observed.	Objective Evidence Observed: Not Applicable.

Other findings

Other Findings Outside the Scope of the Code
None observed



Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None observed

Appendix 1

<p>Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."</p> <p><input checked="" type="checkbox"/> Not Applicable please x</p>	
<p>NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.</p>	<p>Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>

Photo Form

Non-Conformity Pictures:

		Nil
NC picture 07: Eye guard of flat Lock machines were displaced during work.	NC picture 08: Eye guard of over lock machines were displaced during work.	Void

Good Examples picture:

		Nil
Hand-washing facility for COVID-19	Awareness poster regarding COVID-19	Void

General photos:

		
Factory name	Factory building	Facility gate



Security post



Rooftop



All over printing



Cutting section



Placement printing



Label printing



Sewing section



Pressing section



Poly area















Folding section















Quality check area






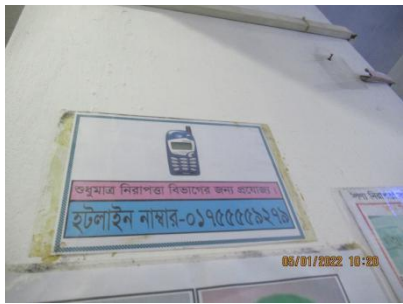


Packing section




		
Fabric store	Accessories store	Finished goods store
		
Firefighting equipment	Fire alarm switch	Fire alarm bell
		
Illuminated exit light	Sprinkler	Fire extinguishers
		
Trade Union office	Fire hose demonstration	Fire hose cabinet

		
Fire resistant door	P. A. (Public Address) System	Drinking water point
		
PPE Box	Staircase	Evacuation plan posted
		
Eye wash station	ETI Base Code posted	First aid box
		
Medical room	Patient bed	Childcare room

		
Dining	Canteen	Toilet

		
Complaint box	Notice board	No Smoking Sign

		
Hot line number Posted	Risk Assessment Posted	No Smoking Sign

		
Chemical Storage	Boiler	Power generator

		
Compressor	Effluent Treatment Plant	Fire pump room



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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

[Click here for Auditors:](#)

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