

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

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

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC172260174	Auditor company name	Arche Advisors
Date of audit	2024-11-25	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS172260624	Site name	ACN EXPORTS
Business name	ACN Exports	Site address	342012 G-25, 2ND PHASE BORANADA INDUSTRIAL AREA, JODHPUR, IN
Site phone	9910848181	Site email	info@acnexports.com

Audit parameters

Time in and out	Day 1		Day 2	
	In	09:30	In	09:20
	Out	18:00	Out	14:30
Audit type	Full initial			
Was the audit announced?	Semi announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Dhiraj Bengani / General Manager			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No Union, Hence Not Applicable.		
Reason for absence during the audit	No Union, Hence Not Applicable.		
Reason for absence at the closing meeting	No Union, Hence Not Applicable.		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>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.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	None		
Lead auditor	Abhishek Singh	APSCA Number	21705182
Additional auditor			
Date of declaration	2024-11-26		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Dhiraj Bengani
Title	General Manager
Date of declaration	2024-11-26





































Summary of findings


Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	§1	NC ZAF-
	3.R Provide clean and secure toilets, wash ar...	§2	NC ZAF-
	3.H Where identified as necessary to reduce r...	§3	NC ZAF-
	3.L Implement effective processes to manage f...	§4	NC ZAF-


Local law issues


§1	<p>In accordance with the Rajasthan Municipal Act, 2009. Section 255: Arrangement for Fire Prevention - The Municipality may require, by bye-laws, the owner or the occupier of all or any of the premises in the municipal area to make such arrangements as may be necessary for fire prevention and fire safety in the municipal area and may also require the owner or the occupier to obtain a no objection certificate in this behalf in such form and in such manner and from such authority as may be specified in such bye-laws.</p>
§2	<p>In accordance with Factories Act 1948, Chapter IV section 38 (1), in every factory all practicable measures shall be taken to prevent out break of fire and its spread both internally and externally and to provide and maintain - (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.</p>
§3	<p>In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include-</p> <p>(a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.</p>
§4	<p>In accordance with Factories Act 1948, Chapter IV section 38 (1), in every factory all practicable measures shall be taken to prevent out break of fire and its spread both internally and externally and to provide and maintain - (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.</p>


Management systems

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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

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

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

Site details

Company and site details

Sedex company reference	ZC172260174	
Sedex site reference	ZS172260624	
Company name	ACN Exports	
Business ownership type	GOODS	
Site name	ACN EXPORTS	
Site name in local language	ACN EXPORTS	
GPS location	GPS address	G-25, 2ND PHASE BORANADA INDUSTRIAL AREA, JODHPUR, 342012
	Coordinates	Latitude: 26.1866 and Longitude: 72.9379
Is the worksite in a remote location, far from habitation?	Yes	
		Boranada Industrial Area
Site contact	Contact name	Mr. Dhiraj Bengani
	Job title	General Manager
	Phone number	9910848181
	Email	info@acnexports.com
Applicable business and other legally required business license numbers and documents	Factory License - RJ/30275 Dated: 27.12.2021 for 99 Person and 125 HP Valid Till: 31.03.2031, Stability Certificate - F&B 2021 - 186 Dated: 02.09.2021 by B M Consultancy, GST - 08AENPB1170R1Z5 Dated: 20.09.2017, IEC - 2601001020 Dated: 09.11.2001 last Modified on 04.06.2022.	

Site activities

Site function	Factory Processing/Manufacturer
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Site activities

Site activities	Primary	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials
	Secondary	
	Other	
Product type	Wooden Handicrafts	
Process overview	<p>Process Flow Chart - Raw - Sanding - Polishing - Painting - Metal Work - Lacquering - Inspection - Packaging - Dispatch.</p> <p>Equipment - Lazer Machine, CNC Machine, Sanding, Spray Booth, Lifts, Diesel Generators, Transformer and Compressor.</p>	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	1475m ²	
Building 1	Last construction works on site	2001
	If building is shared, provide details	N/A
	Number of floors	2
	Description of floor activities	<p>Basement - Packaging Material Storage and Hardware Storage.</p> <p>Ground Floor - Admin Area, Offices, Showroom, QC Checking and Packaging and Dispatch Area.</p> <p>First Floor - Painting, Hardware Fixer, Spray Paint Booth and Metal Work.</p> <p>Second Floor - Polishing, Sanding, Lacquering and Spray Paint Booth.</p> <p>Periphery - Security, Diesel Generator, Transformer, Compressor, Parking, Hazardous Waste Storage, Toilets and Drinking Water Point.</p>
Is there any difference between the site scope of the audit and the Sedex site profile?	No	

Site scope

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site? No

Is any activity conducted onsite not included within the scope of the audit? No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not applicable
No Transport Provided.

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	90-95%	April	90-95%
	May	90-95%	June	90-95%
	July	90-95%	August	90-95%
	September	90-95%	October	90-95%
	November	90-95%	December	90-95%

Is there any night or back shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

Site assessments

<p>Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?</p>	<p>No Site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.</p>
<p>Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?</p>	<p>Yes Human Rights Impact Assessment (HRIA) conducted and last reviewed on 02 January 2024.</p>

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	100 (100%)	0 (0%)	- -	100 (100%)

Workers by type

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

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

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

Not Applicable as all workers are from Local Area of Jodhpur.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	8 (8%)	0 (0%)	- -	8 (8%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

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

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	100%	0%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	100 (100%)	0 (0%)	- -	100 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	100 (100%)	0 (0%)	- -	100 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details Not Applicable.

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (1%)	2 (2%)	- -	3
Supervisors or team leaders	2 (2%)	0 (0%)	- -	2
Administrative staff	0 (0%)	1 (1%)	- -	1

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 5 Male Workers in 1 Group.

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

Was there any indication that workers had been 'coached' in how they should respond to questions? No

What was the general attitude of the workers towards their workplace? Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No complaint received from the workers. They were satisfied with the facility arrangements and work environment.
What did the workers like the most about working at this site?	Freedom of movement Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Job security Work atmosphere (e.g. treatment by supervisors) Grievance mechanisms Pay
Additional comments	None
Attitude of workers' committee/union representatives	Workers committee representative was interviewed. The representative was comfortable with the working conditions and management support, and stated they could give suggestions freely to the facility management. The management has a collaborative approach with them and takes their suggestions for improvement. He stated that the workers themselves elect the representatives from workers.
Attitude of managers	The facility management had been fully transparent, very receptive about the audit process and they were dedicated to ensuring the compliance in the facility. They ensured the full co-operation to the auditor during the entire audit process and welcomed the audit results. They were maintaining very positive attitude and had a proactive approach to follow compliance in their facility campus and meet the client expectations. They took all the discussions in notice for future references.

Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	5	0	-	5
Workers interviewed individually	5	0	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	0.0%	-	1.0%
Last full calendar year (2023)	2.0%	0.0%	-	2.0%
Previous full calendar year (2022)	1.0%	0.0%	-	1.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	0.0%	-	2.0%
Last full calendar year (2023)	1.0%	0.0%	-	1.0%
Previous full calendar year (2022)	1.0%	0.0%	-	1.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded? Yes

Facility maintained Form-29 register of accidents. However, no accidents reported till date.

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

	Men	Women	Other	Total
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Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

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

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> • general Manager was responsible to ensure compliance with these code requirements. • Facility has allowed the auditor to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself. • Facility has not offered any bribes to or threatened the auditor, nor in any way induce the auditor to be dishonest. • Facility is operating on own land for audited site in industrial area. All required documents were available for review and found in compliance. • Employees were found trained about the Ethical Trading Initiative (ETI) code requirements. • Facility has displayed copy of ETI Code of Conduct in local language for employee's reference on the Main Notice Board. • Facility has communicated ETI code requirement to their suppliers. • Facility has conducted internal audit to monitor effectiveness of social management system implemented at audited site. • Facility does have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land rights. • Facility does have a written policy and procedures specific to land rights. The facility has policy on "Human Right" which is duly endorsed by management and management representative is responsible for implementation. <p>Evidence Examined:</p> <ul style="list-style-type: none"> • Facility policy on human rights reviewed dated 16 September 2024. • Land Rights Policy reviewed dated 16 September 2024. • Training on Human Rights dated 07 September 2024. • Interaction with Management and Interview with workers. 		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review? No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Freely Chosen Employment in Social Compliance Manual. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- General Manager was responsible to ensure compliance with this code requirement.
 - Workers are recruited through a personal interview. Workers are not required to lodge any deposits or identity papers with the facility before or after joining the services.
 - Facility does not require monetary deposit or deposition of employee's original ID card such as a condition of employment.
 - Workers are free to leave at the end of their shift and no overtime hours done in the facility.
 - The facility does not restrict the employee's freedom of movement.
 - Facility had documented policies and procedures for Freely Chosen, Bonded/Prison Labour.
 - Facility had not engaged any Bonded/Prison Labour at site.
- Evidence Examined:
- Facility Policy and Procedures of Freely Chosen, Bonded/Prison Labour reviewed dated 16 September 2024.
 - Appointment Letter of 10 out of 10 employees selected for employee interview.
 - Interaction with Management and Interview with workers.
-

1. Employment is freely chosen

Data points

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Responsible recruitment and entitlement to work. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

- General Manager as responsible to ensure compliance with this code requirement.
 - Facility reviews original photographic identification to validate that all workers have the legal right to work or require any labor provider and on-site subcontractor to do the same and put in place effective due diligence to monitor that they do so.
 - Facility does not retain the documents of workers.
 - Facility ensures that the nature of work, working conditions, living conditions, employment terms, living costs, wages and benefits are accurately communicated to orders during recruitment and provide the training at the time of hiring.
 - Facility includes all the appropriate requirements and protections for children and young workers within service agreements with employment agencies and recruitment partners.
 - Facility has systems in place to verify that all workers are recruited legally and fairly.
 - Facility has recruited all workers directly and no one was hired through employment agencies and other recruitment partners.
- Evidence is examined:
- Facility's own policies and procedures for recruitment process, retain documents, young workers reviewed dated 16 September 2024.
 - Training and evaluation Records dated 07 September 2024.
 - Interaction with Management and Interview with workers.
-

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No

No recruitment fees or costs identified during worker interviews.

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Freedom of association and right to collective bargaining. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- General Manager was responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management'.
 - At present, employees employed at site are not associated with any trade union.
 - Employees without distinction, have the right to join any union or form trade unions of their own choosing and to bargain collectively.
 - Facility had provided suggestion box through which employees can report grievances. Further, workers can also approach management with their grievance and adequate actions taken.
 - There was no Collective Bargaining Agreement (CBA) between facility management and workers as it is not legally mandatory requirement.
 - Facility has formed Works committee with appropriate number of members from management and workers.
- Evidence Examined:
- Facility Policy and Procedure on Freedom of Association reviewed dated 16 September 2024.
 - Suggestion Box Logbook.
-

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

Data points

Are trade unions allowed by law in the national context? Yes

Are there any registered trade unions in the workplace? No

Are they active?

Does the employer recognise the trade union? Not Applicable

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? No worker representative bodies

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Yes

Does the membership reflect the nationality composition of the workforce? Yes

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Working conditions are safe and hygienic. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	§1	NC ZAF-
	3.R Provide clean and secure toilets, wash ar...	§2	NC ZAF-
	3.H Where identified as necessary to reduce r...	§3	NC ZAF-
	3.L Implement effective processes to manage f...	§4	NC ZAF-

Systems and evidence examined to validate this code section

1. General Health and Safety management
 - General Manager was responsible for Health & Safety aspects for the site.
 - Potable water was freely available in the facility and test certificate was obtained from competent laboratory.
 - Sufficient number of toilets were available at all times to workers. Toilets maintained in hygienic condition. 11 Urinals and 7 Toilet Seats.
 - Ventilation, temperature and lighting were adequate in all section of the facility.
 - Housekeeping found acceptable throughout the facility.
 - Facility has obtained Business License including approved building layout plan and stability certificate situated in a shared building.
 - Facility building found structurally in safe condition.
 - Facility had provided dining hall for workers to have meal during rest break.
 - Facility has formed health and safety committee to resolve health and safety issues. The committee meets on regular intervals.

2. •There were sufficient number of exits from each work area/floor.
 - Facility has installed 29 Fire extinguishers, 5 Fire Hydrants, 5 Fire Hose Reels, 53 Sprinklers covering entire basement premises.
 - Facility has installed 1 Fire Alarm panel, 5 Fire alarm with 5 Fire alarm call point at audited site covering all section of the facility. Fire alarm system found operational on the day of audit.
 - 9 Emergency lights are provided with secondary power source back up to ensure adequate illumination is available in case of normal power failure.
 - Firefighting equipment inspections conducted once in a month.
 - Adequate evacuation plans posted in the production building.
 - Mock drills were organized and recorded once in every two months.
 - Facility has marked all the exits of facility in local language for employee's reference.
 - All exit passages found free from obstructions.
 - Fire safety training provided to sufficient number of workers through competent agency.
 - Aisles route found adequately marked in all required areas.

3. Machine & Electrical safety
 - All machines and electrical equipment found maintained in good condition. However, facility had not established policy on maintenance of machinery equipment installed.
 - Facility had obtained periodic inspection test report for 02 Air Compressor.
 - Facility had provided adequate safety guard on all required plant and machines.

4. Chemical safety and use of PPE's
 - Chemicals containers of Machine Oil and Spotting Chemicals was stored with appropriate label and secondary containment.
 - Personal Protective Equipment provided and worn by all workers.
 - Training provided on usage of PPEs to all workers and chemical handling to all the relevant workers.
 - Eye Wash provided at chemical storage and wherever chemicals are used by facility.

5. Medical services
 - Facility had provided 3 first aid box with adequate contents.
 - Facility had trained 4 first aiders to deal with any first aid emergencies.
 - Facility had conducted medical examination of 3 chemical handlers working with chemicals through competent doctor once in every 12 months. Last Medical Testing Dated: 09.11.2024.

Findings: non-compliances

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

172 - Fire licence, inspection or certificates not in place as required by law

Verification method

Desktop audit

Description

Based on document review it was found that factory has obtained Fire NOC which was found expired on dated: 5th June 2024. However, factory has applied for the renewal on dated: 7th November 2024 with application no. URSOUTH/Fire NOC/2024-25/42488.

Area of non-compliance/non-conformance

Local law
Base code

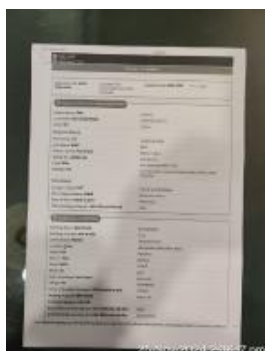
Corrective and preventative actions

It is recommended to factory to obtain Fire NOC from the concerned authority.

Local law reference

In accordance with the Rajasthan Municipal Act, 2009. Section 255: Arrangement for Fire Prevention - The Municipality may require, by bye-laws, the owner or the occupier of all or any of the premises in the municipal area to make such arrangements as may be necessary for fire prevention and fire safety in the municipal area and may also require the owner or the occupier to obtain a no objection certificate in this behalf in such form and in such manner and from such authority as may be specified in such bye-laws.

Evidence



[NC- Application for Fire NOC.jpg](#)



* PDF generated at 09:54 (UTC) on 27 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

326 - Materials/rubbish/other waste stored in unacceptable areas e.g. stairwell

Area of non-compliance/non-conformance

Local law

Description

Based on site tour it was found that factory has stored packaging material near stairs heading toward basement to ground floor.

Base code

Corrective and preventative actions

It is recommended to factory to ensure that no material should be stored near stair area.

Local law reference

In accordance with Factories Act 1948, Chapter IV section 38 (1), in every factory all practicable measures shall be taken to prevent out break of fire and its spread both internally and externally and to provide and maintain – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.

Evidence



[NC- Material Stored under Stairs.jpg](#)

* PDF generated at 09:54 (UTC) on 27 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

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

Verification method

Desktop audit

Description

Based on site tour it was found that workers at Filling Section were not using provided PPE i.e. Hand Gloves.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended to factory to ensure that all workers must use required PPEs at working time.

Local law reference

In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include-

- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health,
- (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances,
- (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

Evidence



[NC - Hand Gloves Not Used.jpg](#)



* PDF generated at 09:54 (UTC) on 27 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

208 - No emergency exits are properly marked and lighted

Verification method

Desktop audit

Description

Based on site tour it was found that factory has not marked secondary exit at Basement.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended to factory to mark secondary exit at basement area.

Local law reference

In accordance with Factories Act 1948, Chapter IV section 38 (1), in every factory all practicable measures shall be taken to prevent out break of fire and its spread both internally and externally and to provide and maintain – (a) safe means of escape in all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory, all the employees are familiar with means of escape in case of fire and have been adequately trained in the routine to be followed in such case.

Evidence



[NC- Secondary Exit not Marked.jpg](#)



* PDF generated at 09:54 (UTC) on 27 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Lacquers, Silar Thinner and Paints.
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Facility has valid building layout plan available and approved from legal authorities.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Child labour. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- Compliance Manager was responsible to ensure compliance with this code requirement.
 - Facility had posted a Child Labour Policy Board in Local Language near notice board, which states "No Child labour allowed in the factory".
 - Facility has established Child labour policy.
 - Based on the physical appearance of employees during walk through and Interviews with workers, there was no evidence of child labour or young labour observed / reported.
 - Facility has maintained valid age proof documents.
 - Based on tour of the facility, employees interview physical appearance of workers, interview with the workers there was no evidence of child / young worker. As per the employee interview, minimum age was found to be 21 years.
 - Based on record review facility has maintained valid age proof records for 10 out of 10 selected Workers.
- Evidence Examined:
- Facility's hiring policy and procedure reviewed dated 16 September 2024
 - Child Labour not to be employed policy reviewed dated 16 September 2024.
 - Review of Age proof records- Aadhar card, Pan card and school leaving certificates
 - Review of Personnel files.
 - Interaction with management and interview with workers.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	8%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	21
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Legal wages are paid. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- General Manager was responsible to ensure that all workers paid legal minimum wages with all legal benefits on time as per law.
 - Based from review of wage records, it was noted that the facility has paid more than applicable minimum wages to the workers.
 - Based from worker interview, wages fixed on daily basis and paid once in a month.
 - Wages paid to all the workers through bank transfer on or before 7th of every month.
 - Based from worker’s interview, wage slips provided to all the workers and are aware of their wage calculations.
 - Based from audit process and wage record review, social security benefits like Employee Provident Fund (EPF) and Employee State Insurance (ESI) extended to all eligible workers employed at site
 - Based from audit process and wage record review, overtime hours found worked by workers during all sample months within legal limits and paid at 200% of ordinary rate of wages found in line with local law and ETI Base Code.
 - Bonus benefit was extended to all eligible workers.
 - Facility has extended Leave with Wage benefits to all eligible workers.
 - Deductions from wages as a disciplinary measure and any other illegal deductions not permitted as per the facility rules.
- Evidence Examined:
- Facility Wages and Benefit Policy and Procedure reviewed dated 16 September 2024.
 - Wage records, Pay slip and Time records of 10 selected samples for 03 sample months i.e. October 2024 (Most Recent paid month), February 2024 (Random month) and November 2023 (Random month).
 - Bank transfer proof of wages.
 - Leave with wage records (Form No: 18).
 - List of National and Festival Holidays for the year 2023 and 2024.
 - Full and Final Settlement Records (1 Left Worker)
 - Interaction with management and interview with workers.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

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

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable

Actual overtime hours	Max hours per day	0.0
	Max hours per week	0.0
	Max hours per month	0.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	7410.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	7850.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	142.48
	Min per week	854.88
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	10
Provide the date and details of the records	10 Workers for the Month of October 2024, February 2024 and November 2023.
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes Minimum Wages: Unskilled: 7410 Semi-Skilled: 7722 Skilled: 8034 Highly Skilled: 9334

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% Above Minimum Wages
Are there any bonus schemes used?	Yes Facility is paying bonus to all applicable workers at 8.33% of payable minimum wages paid in Financial Year to all workers on 15.09.2023.
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> • Facility had paid all workers including benefits more than credible defined living wage. • Facility had calculated the living wages through Food Basket by considering the cost of living for a family of 4 members. Evidence Examined: <ul style="list-style-type: none"> • Facility Wages and Benefit Policy and Procedure reviewed dated 16 September 2024. • Living Wage Sheet. • Interaction with management and interview with workers. 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Working hours. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- General Manager was responsible to ensure compliance with regular and overtime hours as per law.
- Facility had implemented Bio-Metric Finger Scan Time Recording System as IN/OUT time recording system. "IN/OUT" time record maintained for all 10 selected workers.
- Facility ensure that overtime is voluntary, paid at premium rate defined by local legal authorities and used responsibly.
- Further noted through audit process that workers work 6 days a week in 8 hours shift excluding 60 minutes break and overtime hours observed during sample months were within legal limits of 2 hours per day and 12 hours per week. Facility operates 06 days a week in one shift for workmen, security guard and staff members and details are mentioned below-
Production, Non-Production Workers and Staff Members:
Shift Timing: 9:30am to 06:00pm
- Meal break - 30 minutes on staggered basis for production, non-production workers.
- Weekly off - Sunday workers.
- As per available IN/OUT time record, weekly rest after 6 days of working was provided to all the workers in all sampled months.
- Based on tour of the facility, it was noted that the working hours and weekly rest day are displayed on notice board.
- Evidence Examined:
- Facility Work Hours policy and procedures reviewed dated 16 September, 2024.
- In/Out time records for selected samples for 03 months as per below -
A) October 2024 (Most recent paid month) - 10 samples
B) February 2024 (Random month) - 10 samples
C) November 2023 (Random month) - 10 samples
- Interaction with management and interview with workers.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Facility is paying overtime 200% of the ordinary rate of wages as per legal requirement.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of discrimination. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> •General Manager was responsible to check discrimination issue in the facility. •No discrimination reported / observed in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation. •The site ensure access to grievance and complaint mechanism such as suggestion box. It also include any unfair dismissal and non-retaliation. •All workers have fairly equal opportunity for training in their respective departments. •Facility does not discriminate any worker at the time of hiring, promotion etc. <p>Evidence Examined:</p> <ul style="list-style-type: none"> •Facility No Discrimination policy and procedure reviewed dated 16 September, 2024. •Appointment letter with terms and conditions of employment for 10 of 10 selected sampled workers. •Salary and other benefit records. •Interaction with management and interview with workers. 		

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	
Representation of women in supervisory roles (ratio of women workers to women supervisors)	
Three most common nationalities in managerial and supervisory roles	There is only one nationality of manager and supervisor work at facility named as Indian.

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Regular employment. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> •General Manger was responsible to ensure compliance with these code requirements. •Employment contracts (appointment letters) were available and maintained for 10 of 10 selected workers. •Facility does not follow the fixed term employment. •Facility understands recruitment process. •Facility had not employed any international migrant workers. •Based on interaction with workers, no recruitment fee is required at any stage of the recruitment process. Evidence Examined: <ul style="list-style-type: none"> •Facility Hiring policy and procedure reviewed dated 16 September 2024. •Appointment letter with terms and conditions of 10 of 10 selected samples. •Salary and other benefit records. •Interaction with management and interview with workers. 		

8. Regular employment is provided

Data points

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

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Sub-contracting and homeworkers. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			<ul style="list-style-type: none"> • General Manager was responsible to ensure compliance with these code requirements • Facility does not use any Subcontracting Process or home worker for any of the production process for product produced at site. Evidence Examined: <ul style="list-style-type: none"> • Facility Subcontracting policy and procedure reviewed dated 16 September 2024. • Production records. • Inward and Outward Challan. • Interaction with management and workers.

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

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
NO such practice.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
Not Applicable.

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of No harsh or inhumane treatment. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- General Manager was responsible to ensure no harsh or inhumane treatment practiced on shop floor.
 - There was no evidence of harsh or inhumane treatment of workers.
 - All workers treated with respect and dignity.
 - Facility's disciplinary policies explained to all workers, and all are well aware about their rights.
 - No evidence of physical abuse, sexual or any other harassment / verbal abuse observed / reported.
 - Facility had not displayed Certified Standing Order at Notice Board for worker's reference.
 - Facility had a written disciplinary procedure, communicated to the workers.
 - Facility has formed Grievance committee to discuss and resolve grievances amongst workers.
 - Facility has formed Prevention of Sexual Harassment Committee to discuss and resolve any harassment issues reported.
- Evidence Examined:
- Facility No Harassment at workplace policy and procedure reviewed dated 16 September 2024.
 - Grievance Committee minutes dated 19 September 2024.
 - Prevention of Sexual Harassment Committee minutes dated 17 September 2024.
 - Interaction with management and interview with workers.

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')? Yes, there is a formal grievance process

What type of grievance mechanism(s) are available? The grievance process is available to all workers

Number of grievances raised in the last 12 months 0

Number of grievances resolved in the last 12 months 0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Environment. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			<ul style="list-style-type: none"> •General Manager was responsible to meet all environmental requirements. •Facility was exempted to obtained pollution Consent from Government Authority. •Facility had conducted risk assessment on environmental impacts on regular intervals. Evidence Examined: <ul style="list-style-type: none"> •Facility Environment policy and procedure reviewed dated 16 September 2024. •Environment Risk Assessment dated 02 January 2024. •Interaction with management and interview with workers.

10.A. Environment 2-Pillar

Data points

<p>Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>No environmental or energy management certificates</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>No</p>

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section			<ul style="list-style-type: none"> •Facility communicates their policies and processes, endorsed at the highest level, that includes commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders. •Facility has a proper establishment procedure to resource-use targets and a plan to reach them. •Facility has regularly monitored and mitigate the site's impacts on biodiversity. •Facility had not formed recycling policy to dispose the waste generated. •Facility had not appointed a competent individual responsible for coordinating the site's efforts to improve environmental performance. •Facility had conducted necessary air ambient, workplace noise monitoring test, stack emission test of diesel generator from competent third-party agency on regular intervals. •Facility had conducted necessary training on waste handling for all workers working inside the premises. •Facility had disposed its waste such as Empty Chemical Containers, Chemicals, Used Machine Oil and E Waste •During audit process, one worker that work to maintain environment management system was interviewed and found aware about all requirement pertaining to this code. <p>Evidence Examined:</p> <ul style="list-style-type: none"> •Facility Implemented their environment policies and periodically shared with stakeholders. •Reduction targets policy reviewed dated 16 September 2024. •Air Ambient Test dated 18 June 2024. •Workplace Noise Monitoring test dated 14 June 2024. •Waste Handling Training dated 07 September 2024. •Interaction with management and interview with workers.

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Switching to renewable energy sources Prioritising local suppliers Responsible use and management of water
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes System in place for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Water Consumption and Discharge - 2% Waste Reduction - 3% Energy - 2%
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	15,484	16,480
Total electricity consumption from renewable sources (kWh)	54,579	61,233
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar

Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	Diesel - 300	Diesel - 337
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local Water Authority	Local Water Authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,410	1,350
Water discharged	Local Water Authority	Local Water Authority
Water volume discharged (m3)	1,011	9,455
Water volume recycled (m3)	0	0
Total waste produced (mt)	0	0
Total hazardous waste produced (mt)	320	410
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	54,000	56,000

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ol style="list-style-type: none"> 1. Facility has established and maintained policies and procedures of Business Ethics. The review of said policy and procedure was conducted once in 12 months. 2. Facility has appointed General Manager responsible for implementing this policy and procedure. 3. Facility has communicated all the Policies and Procedures on Notice Board for all workers reference and through internal training conducted once in six months. 4. Facility has conducted Internal Audit to monitor the effectiveness of procedures to meet policy and Workplace Requirements once in 12 months.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- General Manager was responsible for compliance pertaining to Business Ethics.
 - The business was conducted ethically without bribery, corruption, or any type of fraudulent Business Practice as per policy.
 - There is no current local legislation to demonstrate compliance with fiscal legislative requirements.
 - There is Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice and reviewed at least once in year.
 - There is no current local legislation. However, it was noted during review of records and interaction with the facility management that they have communicated business code of conduct to all workers through internal trainings conducted on regular intervals.
 - There is Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice and communicated to all appropriate parties, including its own suppliers through e-mail.
- Evidence Examined:
- Facility Business Ethics policy and procedure reviewed dated 16 September 2024.
 - Internal Training on Business Ethics Policy dated 03 September 2024.
 - Interaction with management and interview with workers.
-

10.C. Business ethics

Data points

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

No

Provide any certified anti-bribery management systems for the site

No certified Anti-Bribery Management Systems for the site.

Attachments



[Water Sprinklers.jpg](#)



[Suggestion Box.jpg](#)



[Mounted Ceiling Extinguisher.jpg](#)



[Manual Call Point.jpg](#)



[Fire Alarm.jpg](#)



[Emergency lights.jpg](#)



[GST Certificate.jpg](#)



[Pay Slips.jpg](#)



[Salary Sheet.jpg](#)



[Law Abstract Displayed.jpg](#)



[Emergency Exit.jpg](#)



[Approved Layout Plan.jpg](#)





[Secondary Containment Provided.jpg](#)



[Factory License.jpg](#)



[Compressors.jpg](#)



[Pump.jpg](#)



[Fire Alarm Panel.jpg](#)



[IEC Certificate.jpg](#)



[Attendance System - Biometric.jpg](#)



[Factory Entrance.jpg](#)



[Drinking Water Point.jpg](#)



[Lacquring Section.jpg](#)



[First Aid Box.jpg](#)



[Stability Certificate.jpg](#)



[Dining Area.jpg](#)



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[Diesel Generator.jpg](#)



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[Notice Board.jpg](#)



[Laser Engraving Machine.jpg](#)



[Evacuation Plan Displayed.jpg](#)



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