



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC4245074	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS4398004
Business name (Company name):	JMS TRADING Co.		
Site name:	JMS TRADING Co		
Site address:	F-482 Metroville, S.I.T.E Karachi 75700 PK	Country:	PK
Site contact and job title:	Muhammad Tanveer Masood / Manager Compliance		
Site phone:	+92-21-32564860	Site e-mail:	info@jmsdex.net
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar
			<input type="checkbox"/> Business Ethics
Date of Audit:	2023-10-13		

Audit Company Name:
SGS Pakistan

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)			

## Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents  
**2-Pillar SMETA Audit**
  - ETI Base Code
  - SMETA Additions
    - Universal rights covering UNGP
    - Management systems and code implementation,
    - Responsible Recruitment
    - Entitlement to Work & Immigration,
    - Sub-Contracting and Home working,**4-Pillar SMETA**
  - 2-Pillar requirements plus
  - Additional Pillar assessment of Environment
  - Additional Pillar assessment of Business Ethics
  - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Maqbool Imran Ahmed	APSCA Number:	21703558
Additional Auditors:	Mehmood Ali		32200728
	Ammar Ali		32200491
Date of declaration:	2023-10-13		

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

Site Representation	
Full Name:	Muhammad Tanveer Masood
Title:	Manager Compliance
Date of declaration:	2023-10-13
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i>  <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i>  <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	3	0	Obs - ZAF600187218 Obs - ZAF600187219 Obs - ZAF600187220
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §2 §3 §4 §5 §6	7	0	0	NC - ZAF600227637 NC - ZAF600227638 NC - ZAF600227639 NC - ZAF600227640 NC - ZAF600227641 NC - ZAF600227642 NC - ZAF600227643
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
§1	Section 22(3) of The Factories Act, 2015: In every factory wherein more than two hundred and fifty workers are ordinarily employed, provision shall be made for cooling the drinking water during the hot weather by effective means and for distribution thereof and arrangements shall also be made for - • (a) the daily renewal of water if not laid on; and • (b) a sufficient number of cups or other drinking vessels, unless the water is being delivered in an upward jet.
§2	Rule 42(c) of Sind Factories Rules, 1975: Soap and towels shall be provided and kept available for workers free of cost at every wash basin and regular arrangements shall be made for replacement of used towels with clean towels daily.

§3	Rule 62(1) of The Sind Factories Rules, 1975: 62. (1) In every factory, all electrical circuits or part of such circuits or any object electrically connected with them whether commonly or occasionally in an electrified condition, which by reason of their position could cause injury to any person, shall be protected adequately, either by non-metallic fencing or insulation or by both, in such manner as to remove danger of injury.
§4	Rule 12 (c) of the Hazardous Substances Rules, 2003: Protective clothing and equipment comprising helmet or cloth cap, safety spectacles or goggles, respirators or masks, rubber or plastic gloves and work boots, shall be available for all workers who may be exposed to hazardous substance, and no workers shall be permitted on job unless and until he is wearing such protective clothing and equipment.
§5	Section 29(4) of Sindh Factories Act 2015: In every factory, every window, door or other exit affording means of escape in case of fire, other than means of exit in ordinary use, shall be distinctively marked in a language understood by the majority of the workers and in red letters of adequate size or by some other effective and clearly understood sign. Section 21. (1) of the Sindh Factories Act 2015; In every part of a factory where workers are working or passing, there shall be provided and maintained - (a) sufficient and suitable lighting, natural or artificial, or both; and (b) emergency lighting of special points in workroom and passages to function automatically in case of a failure of the ordinary electric system
§6	Sindh Factories Rule 1975 section 94(1); in every factory there shall be maintained in good working condition First aid appliances as specified in Appendix I. The First aid Appliances shall be placed under the charges of responsible person, who knows to use them. and shall be kept in readily accessible place within the factory. The work First Aid shall be clearly painted on the box.

## Site Details

Site Details			
Company Name	JMS TRADING Co.		
Site Name	JMS TRADING Co		
GPS location (if available)	GPS Address:	GPS Address: Plot No F-482, Metroville, SITE Karachi, Pakistan	
	Coordinates:	Latitude: 24°54'51.8"N Longitude: 66°59'24.7"E	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	NTN # 1354979, Certificate of Incorporation: Building Stability certificate was issued by structural engineer, Taimoor Jahanzeb Dated: 11-01-2023, valid for 1 year.		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Woven Garments		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	JMS Trading Company is manufacturer and exporter of Woven Garments, located on Plot No F-482, Metroville, SITE Karachi. The factory was established in 2004 on 68132.23 sq/ft area. Factory has two building blocks.		
Structure and number of buildings	Building Name:		Building # 01
	Floor	Description	Remark
	Ground floor	Fabric Store, Washing and Finishing dept	NIL
	Mezzanine floor	Main office, Accounts dept., IT dept., and prayer area	NIL
	1st Floor	Stitching and production offices	NIL
	2nd floor	Cutting, accessories store, sample room, CAD, conference room, workers clinic, carton storage area, and workers canteen	NIL
	3rd floor	R&D, Small washing	NIL
	Building Name:		Building # 02
	Floor	Description	Remark
	Ground floor	Time office, utility area	NIL
	1st floor	Security check post, cooling tower	NIL

Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Building Stability certificate was issued by structural engineer, Taimoor Jahanzeb Dated: 11-01-2023, valid for 1 year.
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	June to August
Process overview	Products: JMS Trading Company is manufacturer and exporter of woven garments to USA and Europe, like Pants, Cargo shorts, Cargo pant, etc. Main Operation: Main operations being carried out in the factory includes Fabric inspection, Cutting, stitching, washing, pressing, finishing, packing and warehousing. Main Equipment: Factory has 147 single needle, 176 Computerized single Needle, 51 double needle, 11 edge cutter, 15 Over lock, 51 safety, 15 Kansai, 01 west band, 13 feedo, 12 Flat-lock, 02 Zigzag, 11 Kaj Machine, 02 eyelet machine, 03 fusing, 01 metal detectors, 02 stright knives cutting machine, 05 washers and 3 dryers all the machines were found in good working condition. Factory has 04 sewing lines, 02 checking and packing lines. Factory has producing capacity of 200,000 pieces per month. Factory has backup power generator of 450 KVA.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Joint Workers Management Committee
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable



Audit Parameters		
Time in and time out	Day 1	
	In	09:04
	Out	15:10
Audit type:	PERIODIC	
Was the audit announced?	SEMI_ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Muhammad Tanveer Masood / Manager Compliance	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No Union present in the factory; factory has workers council committee.		
<i>Reason for absence during the audit</i>	No Union present in the factory; factory has workers council committee.		
<i>Reason for absence at the closing meeting</i>	No Union present in the factory; factory has workers council committee.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	413	0	0	0	0	0	0	413
Worker numbers - female	81	0	0	0	0	0	0	81
Total	494	0	0	0	0	0	0	494
Number of Workers interviewed - male	20	0	0	0	0	0	0	20
Number of Workers interviewed - female	6	0	0	0	0	0	0	6
Total - interviewed sample size	26	0	0	0	0	0	0	26

Nationalities Structure	
Nationality of Management	Pakistani
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: PAKISTANI      approx %:      100%
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Worker remuneration	Workers on piece rate:      00%
	Paid hourly:      00%
	Salaried:      100%
Payment cycle	Paid daily:      00%
	Paid weekly:      00%
	Paid monthly:      100%
	Other:      00%
	Details for other:      NA

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	4 group of 5 workers
Number of individual interviews:	Male: 5 Female: 1
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No specific complaint
What did the workers like the most about working at this site?	Conducive Work environment, on time payments and cooperative management attitude
Any additional comment(s) regarding interviews:	NIL
Attitude of workers to hours worked:	Workers were noted satisfied with the timings and hour of working in the factory.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Attitude of workers:</p> <p>Management allowed SGS auditors to conduct confidential interviews with workers who were freely selected on their respective production sites, confidential interview was conducted with 26 workers randomly selected from different departments. The overall attitude of workers towards management was positive; workers were happy with on time payment and conducive working environment of the factory 1. For child labour issue, all interviewees confirmed that the factory checks their National ID cards to verify their ages during recruitment and only retain their ID cards' copies and the person below 18 years of age were not allowed to work in the factory. All workers interviewed were above 18 years old. 2. For forced labour issue, the workers confirmed that no "deposit" or logging of original documents is required for the employment in the factory. 3. For discrimination issue, the workers' wages were paid only based on their working hours &amp; work ability. All Interviewees confirmed that no any discrimination occurred in the factory. 4. For discipline practice issues, the interviewees said they would be warned if they broke the factory rules. No fine or verbal abuse is used as means of disciplinary practices in the factory. 5. For safety and health issues, the workers were satisfied with the working condition and the factory provided Orientation training to new workers and regular safety training to all workers. Fire drills were conducted in the factory, which included the evacuation exercise and the use of the fire extinguishing facilities. 6. For working hour issue, all interviewees said their normal working hours were 8 hours per day and 48 hours per Week. 7. For wages issue, the interviewed workers said their wages were paid monthly before 07th of each calendar month.; all interviewed workers confirmed that factory double the rate of normal wage for overtime working. Bonus was paid to the workers. 8. For treatment issue, the workers confirmed no harsh or inhumane treatment occurred and the management was kind to all employees. 9. They could complaint to the management staff directly or through worker representatives or use suggestion box.</p>
<p>Attitude of worker's committee/union reps:</p> <p>During audit interview was conducted with the members of "Joint Workers Management Committee" Worker representatives were found happy and comfortable with management attitude. Worker representatives did not share any negative information about the factory management</p>
<p>Attitude of managers:</p> <p>The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had implemented a Health &amp; Safety committee to take care of health and safety concerns. Mr. Muhammad Tanveer – Compliance Officer was responsible for implementing legal and code standards and responsible to conduct internal audits. Management of the facility found very co-operative and positive towards audit process and showed commitment to fulfil all pointed out non-conformances on immediate basis.</p>

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

**0A: Compliance Requirements**

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning 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:**

Factory has not defined and explicitly communicated the United Nation Guiding principles on Business and Human Right Implementing the United Nations "Protect, Respect and Remedy" Framework in the factory and through its supply chain.

- However, factory has defined policy and procedure for compliance with core Human right principles and local laws like child labour, Force Labour, Freedom of association, Payment of wages and decent work environment
- Mr. Zaheer Ahmed - HR & Admin Manger is responsible for compliance with local laws and Human rights issues in the factory
- Facility management was found aware of local law requirements concerning, Human Rights etc. moreover facility obtains law updates from labour department and from local Industrial association.
- The factory has taken written commitment from all its suppliers and contractors to comply with local laws and core Human Rights principles

**Evidence examined:**

Law updates.  
Job descriptions  
Internal audit reports  
Employee handbook

**Any other comments:**

None

Policy statement that expresses commitment to respect human rights?

Yes    No

Please give details:

Factory has not defined and explicitly communicated the United Nation Guiding principles on Business and Human Right Implementing the United Nations "Protect, Respect and Remedy" Framework in the factory and through its supply chain

<p>Are the policies included in workers' manuals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not included in the Worker's Manual, but Factory has separately defined policy and procedure for compliance with core Human right principles and local laws like child labour, Force Labour, Freedom of association, Payment of wages etc.</p>				
<p>Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Mr. Zaheer Ahmed - HR &amp; Admin Manger</p>				
<p>Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory has defined policy and procedure for compliance with core Human right principles and local laws like child labour, Force Labour, Freedom of association, Payment of wages and decent work environment; factory has transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.</p>				
<p>Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>				
<p>Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All employee information and personnel files are kept locked away in the human resources office and only viewed by the HR manager and his team.</p>				
<p><b>Measuring Workplace Impact</b></p>					
<p>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))</p>	<table border="1"> <tr> <td>Last year</td> <td>6.0%</td> </tr> <tr> <td>This year</td> <td>5.0%</td> </tr> </table>	Last year	6.0%	This year	5.0%
Last year	6.0%				
This year	5.0%				
<p>Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])</p>	<p>3.5%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="1"> <tr> <td>Last year</td> <td>6.5%</td> </tr> <tr> <td>This year</td> <td>5.0%</td> </tr> </table>	Last year	6.5%	This year	5.0%
Last year	6.5%				
This year	5.0%				



Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	4.5%	
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Management keeps a record of accidents and injury log is maintained for the accidents and injuries, no injuries was observed in the factory for the last one year, no major or days lost was noted	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	27.0%
	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	5.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	40.0%
	12 month	34.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

Observation		Evidence																								
<a href="#">[Back to findings summary]</a>																										
<table border="1"> <thead> <tr> <th colspan="2">Observation</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600187218</td> </tr> <tr> <td>Clause</td> <td>0A - Universal Rights covering UNGP</td> </tr> <tr> <td>Issue Title</td> <td>29 - No / inadequate management awareness of the social and ethical standards required / ETI base code</td> </tr> <tr> <td>Subcategory</td> <td>Site's Awareness of Code/Legal Requirements</td> </tr> <tr> <td>New or carried over?</td> <td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td> </tr> <tr> <td>Raised by audit</td> <td>ZAA421355677</td> </tr> <tr> <td>Root cause</td> <td> <input type="checkbox"/> Training <input type="checkbox"/> System  <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers  <input checked="" type="checkbox"/> Other                 </td> </tr> <tr> <td>Root cause - Other</td> <td>N/A</td> </tr> <tr> <td>Explanation to the observation</td> <td>Factory has not defined and explicitly communicated the United Nation Guiding principles on Business and Human Right Implementing the United Nations "Protect, Respect and Remedy" Framework in the factory and through its supply chain.</td> </tr> <tr> <td>Actions</td> <td>N/A</td> </tr> </tbody> </table>		Observation		Status	OPEN	Reference	ZAF600187218	Clause	0A - Universal Rights covering UNGP	Issue Title	29 - No / inadequate management awareness of the social and ethical standards required / ETI base code	Subcategory	Site's Awareness of Code/Legal Requirements	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA421355677	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	Root cause - Other	N/A	Explanation to the observation	Factory has not defined and explicitly communicated the United Nation Guiding principles on Business and Human Right Implementing the United Nations "Protect, Respect and Remedy" Framework in the factory and through its supply chain.	Actions	N/A	
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Observation		Evidence																								
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<table border="1"> <thead> <tr> <th colspan="2">Observation</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600187219</td> </tr> <tr> <td>Clause</td> <td>0A - Universal Rights covering UNGP</td> </tr> <tr> <td>Issue Title</td> <td>687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees</td> </tr> <tr> <td>Subcategory</td> <td>Site's Awareness of Code/Legal Requirements</td> </tr> <tr> <td>New or carried over?</td> <td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td> </tr> <tr> <td>Raised by audit</td> <td>ZAA421355677</td> </tr> <tr> <td>Root cause</td> <td> <input type="checkbox"/> Training <input type="checkbox"/> System  <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers  <input checked="" type="checkbox"/> Other                 </td> </tr> <tr> <td>Root cause - Other</td> <td>N/A</td> </tr> <tr> <td>Explanation to the observation</td> <td>No risk assessment has been conducted to evaluate the effectiveness of the company policy and procedure</td> </tr> <tr> <td>Actions</td> <td>N/A</td> </tr> </tbody> </table>		Observation		Status	OPEN	Reference	ZAF600187219	Clause	0A - Universal Rights covering UNGP	Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees	Subcategory	Site's Awareness of Code/Legal Requirements	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA421355677	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	Root cause - Other	N/A	Explanation to the observation	No risk assessment has been conducted to evaluate the effectiveness of the company policy and procedure	Actions	N/A	
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Actions	N/A																									

Observation		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Observation</b>		
Status	OPEN	
Reference	ZAF600187220	
Clause	0A - Universal Rights covering UNGP	
Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees	
Subcategory	Site's Awareness of Code/Legal Requirements	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA421355677	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	N/A	
Explanation to the observation	Factory has not completed SAQ at the time of audit	
Actions	N/A	

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

**OB: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

Factory has established, documented, maintained and effectively communicated social compliance policy and procedure in the factory. As per policy factory is committed to provide a workplace environment complying and compatible with all applicable laws. The facility discourages discrimination, employment of child and forced labour, harassment/abuse or corporal punishment and all other activities that contradict with local laws and buyer's code of conduct.

- Local government departments like Labour department and Civil defense departments are conducting annual inspections at the factory.
- Facility management was found aware of local law requirements concerning child labour, wages, hours of work, health and safety, environments etc. moreover facility obtains law updates from labour department.
- Facility has appointed Mr. Muhammad Tanveer Masood- Manager compliance to ensure implementation of local law and international labour standards requirement and during interview Mr. Zaheer - HR & Admin Manager was found aware of legal and standard requirements.
- Facility is conducting internal audits on quarterly basis to ensure effectiveness of social policy and procedure.
- The factory has taken written commitment from all its suppliers to comply with social compliance code of conduct.
- In the last 12 months, facility has not been subject to any fines / prosecution for noncompliance confirmed during management interviews.
- Factory is also WRAP certified

**Evidence examined:**

Social compliance policy and procedure manual  
Job descriptions of HR & Admin Manager  
Internal audit reports  
Company policies  
Training records.  
Supplier's Communication Records.

**Any other comments:**

None

**Management Systems**

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

Yes  No

Please give details:

As per Labour Inspector report

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has established policy and procedure related to forced labour, child labour, anti-discrimination and harassment, policy found communicated to all workers.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Policies and procedure exit to reduce the risk of child labour; Force Labour; Harassment & Abuse and discrimination. The policies and procedure were found fully implemented and no incident of child labour, forced labour, harassment abuse and discrimination case were noted during facility visit, documents review and worker's Interview.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Managers and workers were properly trained on the policies of 'No Forced labour' No child labouring, and 'No harsh treatment and discrimination, factory policies were found displayed on notices boards and communicated to managers and workers through orientation training and factory hand book annual training
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Bi- Annual training for all employees, last conducted 05-04-2023 Introductory training record for new employees reviewed.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: WRAP-(valid till, 18-09-2024)
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Factory has established HR department, which is led by Mr. Zaheer - HR & Admin Manager for HR issues.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Zaheer Ahmed - HR & Admin. Manager
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has defined policy in HR manual to ensure confidentiality of worker's information.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All worker information is kept locked in files in the HR office.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Risk assessment has not been conducted to evaluate the effectiveness of the company policy and procedure

<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Risk assessment has not been conducted to evaluate the effectiveness of the company policy and procedure</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has a policy by which they communicate all social requirements and buyer requirements to its suppliers and take written commitment from them.</p>
<p><b>Land Rights</b></p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: NTN # 1354979-7 Certificate of Registration No. CMI/34/216/2003 dated 25-05-2003</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: These are performed by the Labour Inspection department</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No specific policy and procedure found establish</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not Applicable</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not Applicable</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Owned land for site operation.</p>

**1 - Freely chosen Employment**  
**[Summary of Findings]**

**1: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Factory has forced labour policy and procedure.
- Workers are not required to lodge "deposit" any kind of their (educational certificate), identity papers or any other personal belongings with the employer and are free to leave the company after reasonable notice.
- No prison labour was found working during facility visit.
- Policy was communicated to the workers through notices, worker's handbook and orientation.
- Facility allows employees to move freely within their designated work areas during work hours, including access to drinking water and toilet facilities.
- Employees can leave the facility after work hours confirmed during worker interviews.
- Facility has assigned qualified person with responsibility for communicating, training, deploying and monitoring and ensuring the implementation of forced labour policy and procedure Mr. Tanveer Compliance manager is responsible person for policy communication, monitoring, training & Implementation.
- No sign of force labour was found in the factory during workers interview, documents review and facility visit.
- Factory has also communicated the policy to all its suppliers and contractor's records of acknowledgment reviewed during audit.
- Employment contract was found in accordance with local law and in native language which was found maintained at worker's personal files.
- No such long-term loan scheme is in practice which restricts employees from leaving the facility.
- Overtime working is on voluntary basis.
- Facility is only retaining National identity cards and education certificate copies in employee's personal files no original documents are being retained as a condition of employment.

**Evidence examined:**

- Facility tour.
- Forced labour policy
  - Workers interview
  - Workers personal file
  - Employment contract terms and condition

**Any other comments:**

NIL

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)

Yes  No

Please give details:

Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)

Yes  No

Please give details:



<p>Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<p>Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: there is no restriction as confirm by workers during interview</p>
<p>If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: Not Applicable</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: Not Applicable</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A - there is no forced or trafficked labour at the facility</p>

**2 - Freedom of Association and Right to Collective Bargaining are Respected**  
**[Summary of Findings]**

**2: Compliance Requirements**

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational 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:**

- Factory has defined Freedom of association policy and procedure.
- Mr. Zaheer Ahmed is responsible for monitoring and implementation of this code in the factory
- The same was communicated to all employees, contractors, suppliers through notices, manual and worker's booklets.
- Factory has constituted a 07-member Joint Workers Management Council, comprising of 04 workers and 03 management representatives
- Workers representative was elected by the workers through confidential voting, last election of the council held on 05-01-2023 for period of two years while management representatives were nominated by the management.
- The committee meets quarterly and discusses the worker's issues and complaints and gives its recommendations to the managements for the rectification of the issues. Last meeting of the council was conducted on 13-07-2023; record of the same was verified during audit. Factory has installed complaint and suggestion boxes for handling of grievance and complaints of those workers who do not wish to contact worker representative or management on any issue.

**Evidence examined:**

- Freedom of Association policy and procedure
- Joint work council election records
- Joint work council meeting minutes
- Interviews and discussion with workers and council representatives

**Any other comments:**

NIL

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Joint Workers Management Committee	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

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 Please give details: Factory has constituted 06 members EHS Committee headed by Mr. Akmal Manager production, this committee deals with all the H&S related issues in the factory.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 Please give details: Joint Workers Management Committee members can meet in canteen area and the members are allowed 2 hours per quarter for a meeting. Meeting can be held in conference room area
Name of union and union representative, if applicable:	Not applicable
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Factory has constituted a 07-member Joint Workers Management Committee, comprising of workers and management representative.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Yes
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-01-05
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The committee meet quarterly. There are meeting minutes and the worker's committee interview confirmed that they have met with management as and when required. Last meeting (13-07-2023) minutes were found displayed on the notice board or production area for worker's awareness. General H&S issues discuss during meeting.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

**3: Compliance Requirements**

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Factory has defined EHS policy and procedure.
- Factory has inspected fire and safety arrangement in the facility through Civil Defence visited on 01 June 2023, next visit in Dec 2023.
- Factory has labour registration certificate issued from labour department "Labour Registration Certificate CMI/34/216/2003
- The facility was inspected by local labour Office; Sarfaraz Ahmed Awan Deputy Director Labour on 03-10-2023 as per his remarks on Form 'C' register working condition in the factory is satisfactory.
- Factory has constituted 06 members EHS Committee headed by Mr. Akmal Manager production this committee deals with all the H&S related issues in the factory.
- The committee conducts quarterly meetings; last meeting of the committee was held on 21-08-2023.
- Mr. Muhammad Tanveer; Manager Health and Safety, is responsible for compliance with health and safety standards in the factory.
- Factory has updated Health and Safety Risk assessment of all its operations on 03-07-2023.
- The factory conducts Evacuation drills biannually; last drills were conducted on 06-06-2023, started at 03:30 pm evacuation time was recorded 2:39 minutes with 450 employees
- Factory has one industrial boiler, boiler inspection is valid till 15-11-2023 reference no CIB/S/INFP/7/1844/2021, factory has appointed third class boiler engineer Mr. Muhammad Imran Yaseen certificate no 24507.
- Mr. Tariq Nawaz certificate no KW- 20061 Govt. of Sindh is certified Electrician of the factory.
- All necessary fire safety equipment like 136 fire extinguishers (DCP, Water type, CO2), 07 fire hydrant points, 11 hose reels, 86 smoke detectors, 13 heat detectors, 18 fire alarm and 10 flasher and sounder buttons along with separate centralized panels for smoke detectors and fire alarms, installed in the factory.
- Factory has water reservoir 80,000 gallon for firefighting.
- There were 21 trained fire fighters in the factory; last training was conducted on 13-09-2023 by – Civil defense trained personnel.
- There were 23 trained first aiders in the factory and 15 First Aid boxes installed in different department of the factory; last first aid training was conducted on 14-09-2023. Training was conducted by Civil defense trained personnel.
- H&S trainings were provided to all employees when they entered the factory.
- Fire exits were available for each factory building connecting every floor.
- There was total number of 34 toilets: 25 for male and 09 toilets for female. Total 56 Wash Basins.
- Accident and injury records were kept, and the factory analyzed the accidents/injuries and took some corrective actions
- Drinking water test was conducted from SGS labs on 20-09-2023 with all required parameters.
- Factory has 01 cargo lifts and 01 passengers lift in the facility, conducts inspection from M/S Qyum Elevator Inspection. Last date 19-07-2023 with 6th month validity.
- Factory has conducted noise level test in the factory Test was conducted from SGS Lab on 18-09-2023. Noise dB found min. 76 and max. 76dB.
- Ambient air quality test was conducted from SGS Lab on 12-09-2023 found under SEQS limits.
- Hygiene check of the workers were conducted by Govt. appointed certifying surgeon Dr. Kamran Awan on 04-09-2023. Hygiene certificates of the workers were available in each worker's personal file.
- Factory has conducted pathological Test of Canteen workers from DOW on 03-07-2023.
- The general H&S conditions such as hygiene, lighting and ventilation etc. were all acceptable.

**Evidence examined:**

- Health and safety policy and procedure.
- Certificate of building stability
- Evacuation drill records.
- Firefighting equipment inspection certificate.
- Health & safety trainings like First aid, firefighting and use of PPE training records.
- Injury and accident records.
- Health and safety inspection reports.
- Machineries and equipment's inspection reports.
- Fire safety list of equipment's.
- Machine maintenance record.
- Test reports of drinking water.
- Workers hygiene cards and vaccination reports.

**Any other comments:**

NIL


<p>Does the facility have general and occupational Health &amp; 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</p> <p>Please give details: The site has a H&amp;S manager and a H&amp;S committee who meet regularly – evidence reviewed during audit last meeting of the committee held on 21-08-2023.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Facility has general Health &amp; Safety and occupational Health &amp; Safety policies and procedures included in worker's manual</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No</p>
<p>Are visitors to the site informed on H&amp;S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory provides H&amp;S information to all visitors and provides details of which PPE's are required for which area.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory have medical room in the facility</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factor has trained first aider on basic first aid training</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory provide transportation to all workers without any deductions from their salary.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: NA</p>
<p>Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility has conducted detailed risk assessment, appropriate control measure taken to reduce the risk up to acceptable level, risk assessment last conducted on 03-07-2023.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory obtained no objection certificate from EPA, Certificate NO EPA NOC SEPA/ROK/GF24/244/22 valid till 22-02-2024</p>

Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?



Yes  No

Please give details:





Factory is using only approved chemicals as per their buyer recommendation


Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600227637	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	299 - No/ inadequate availability of clean drinking water (that meets the World Health Organisation standard for potable water)	
Subcategory	Worker Health	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Section 22(3) of The Factories Act, 2015: In every factory wherein more than two hundred and fifty workers are ordinarily employed, provision shall be made for cooling the drinking water during the hot weather by effective means and for distribution thereof and arrangements shall also be made for - <ul style="list-style-type: none"> <li>• (a) the daily renewal of water if not laid on; and</li> <li>• (b) a sufficient number of cups or other drinking vessels, unless the water is being delivered in an upward jet.</li> </ul>	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During floor visit it was noted that drinking vessels found missing near sampling section, fourth floor.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility will provide drinking vessels to drinking point.	
		 <p><u>Drinking vessels missing.jpg</u></p>






Non-Compliance		Evidence																														
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Actions	It is recommended that factory will provide ebonite																																	

	sheets, danger sign and rubber mats to all electric panels.	 <p><u>Ebonite sheet missing (3).jpg</u></p>
Additional comments	<p>Rubber mats were missing under electrical panels near the washing section on the ground and fourth floor. Additionally, ebonite sheets and danger signs were missing in electrical panels on the fourth floor. We've provided the necessary mats and inner sheets and made sure such issues won't happen again. We've instructed the electrical department to check safety equipment daily. Issue resolved. Picture attached as evidence</p> <p>During the desktop review of the evidence it was noticed that factory has paste missing danger sign, place missing rubber mat and install missing ebonite sheets at identified electric penal.</p>	



Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	CLOSED	
Reference	ZAF600227640	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Resolved by audit	ZAA600028199	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Rule 12 (c) of the Hazardous Substances Rules, 2003: Protective clothing and equipment comprising helmet or cloth cap, safety spectacles or goggles, respirators or masks, rubber or plastic gloves and work boots, shall be available for all workers who may be exposed to hazardous substance, and no workers shall be permitted on job unless and until he is wearing such protective clothing and equipment.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During floor visit it was noted that two trolley workers not wearing safety shoes and one machine operator not wearing PPE's in washing section, fourth floor.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility will ensure and	
		 <p><u>Safety shoes not wearing.jpg</u></p>  <p><u>Safety shoes not wearing (2).jpg</u></p>  <p><u>PPE's not wearing.jpg</u></p>

	provide PPE's to all workers.	
Additional comments	<p>Two trolley workers were found not wearing safety shoes, and one machine operator was without PPE during a floor visit in the washing section on the fourth floor. We've provided the necessary safety shoes and PPE and made sure this won't happen again. We've instructed the relevant department to enforce the rule that workers cannot move trolleys or operate machines without safety equipment. Issue addressed.</p> <p>During the desktop review of the evidence it was noticed that factory has provided safety shoes to trolley worker and all require PPE's to the workers in washing department.</p>	


Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	CLOSED	
Reference	ZAF600227641	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	209 - Not all emergency exits are properly marked and lighted	
Subcategory	Fire Safety - Fire exits	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Resolved by audit	ZAA600028199	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Section 29(4) of Sindh Factories Act 2015: In every factory, every window, door or other exit affording means of escape in case of fire, other than means of exit in ordinary use, shall be distinctively marked in a language understood by the majority of the workers and in red letters of adequate size or by some other effective and clearly understood sign. Section 21. (1) of the Sindh Factories Act 2015; In every part of a factory where workers are working or passing, there shall be provided and maintained - (a) sufficient and suitable lighting, natural or artificial, or both; and (b) emergency lighting of special points in workroom and passages to function automatically in case of a failure of the ordinary electric system	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During floor visit it was noted that one emergency light found missing at emergency exit washing section, ground floor.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days	
		 <a href="#">Emergency light missing.jpg</a>

	<input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility will install emergency light to all emergency exits.	
Additional comments	<p>One emergency light was missing at the emergency exit in the washing section on the ground floor during a floor visit. We installed a new emergency light immediately. See attached picture for evidence. Issue resolved.</p> <p>During the desktop review of the evidence it was noticed that factory has installed emergency light at the emergency exit in the washing section on the ground floor</p>	



Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	CLOSED	
Reference	ZAF600227642	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	289 - First aid box available but contents are missing / contents out of date or otherwise inadequate	
Subcategory	First Aid / Accidents	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Resolved by audit	ZAA600028199	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Sindh Factories Rule 1975 section 94(1); in every factory there shall be maintained in good working condition First aid appliances as specified in Appendix I. The First aid Appliances shall be placed under the charges of responsible person, who knows to use them and shall be kept in readily accessible place within the factory. The work First Aid shall be clearly painted on the box.	 <a href="#">Insufficient medical supplies.jpg</a>
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	 <a href="#">Insufficient medical supplies (2).jpg</a>
Explanation to the non compliance	During floor visit it was noted that insufficient medical supplies in two first aid boxes at admin office and in finishing section ground floor.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility will provide medical supplies as per appendix-1 in all first aid boxes.	
Additional	During the audit, it was observed that there were	

comments	insufficient medical supplies in two first aid boxes, one located in the admin office and the other in the finishing section on the ground floor. Immediate action was taken to address this issue by providing the necessary supplies. Going forward, we have implemented a daily checklist to ensure the continuous availability of required medical items. Picture attached as evidence During the desktop review of the evidence it was noticed that factory has placed sufficient medical supplies in all first aid boxes.	
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Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	CLOSED	
Reference	ZAF600227643	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	189 - Inadequate hose reel installation and maintenance	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Resolved by audit	ZAA600028199	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During floor visit it was noted that fire hose reel found not properly maintained near washing section, fourth floor.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility will properly maintained fire hose reels.	
Additional comments	During the audit, it was identified that the fire hose reel near the washing section on the fourth floor was not properly maintained. Immediate corrective measures were implemented to address this issue. We have taken steps to ensure the proper maintenance of all fire hose reels, and the team has been instructed to conduct weekly checks to uphold their functionality and readiness. Picture attached as evidence During the desktop review of the evidence it was	 <p><u>Not properly maintained hose reel.jpg</u></p>

	noticed that factory has maintained fire hose reels properly	
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**4 - Child Labour Shall Not Be Used**  
**[Summary of Findings]**

**4: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Factory has defined child labour policy and procedure in the factory.
- Factory has communicated the policy by displaying policy on notice board.
- No workers below 18 years are employed in the factory.
- As per hiring procedure prospective workers with authentic age verification documents will be considered.
- HR department ascertains workers age during appointment through documents and interview, workers age verification documents were kept in their personal files for verification.

**Evidence examined:**

- Child labour policy and procedure.
- Personal file for age proof documents like CNIC, Birth certificates and educational certificates.
- Facility visit, interview with suspected workers.

**Any other comments:**

NIL

Legal age of employment:	18
Age of youngest worker found:	19
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
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details: Worker under 18 are not working in the factory

**5 - Living Wages are Paid**  
**[Summary of Findings]**

**5: Compliance Requirements**

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Employees are paid their salary / wages in form of hard cash and bank transferring along with itemized pay stub. Company facilitates all the employees with legal benefits like social security, group insurance, old age benefits, bonus (as per company's annual profit), annual leaves (or encashment) maternity and other leaves.
- During documents review and workers interview it was noted that factory was paying minimum wage PKR 25,000/month as minimum wage to unskilled workers.
- Mr. Syed Zaheer Manager HR and Admin is responsible person to take action on compliant / objection logged / raised and discuss this matter in Workers council meeting and resolve it on priority basis.
- Factory was keeping record of the workers wage and wage slips were provided to the workers.
- All permanent employees are covered through group Insurance in the factory.
- Factory pays yearly bonus to all workers.
- Factory contributes for social security and old age benefits of the workers

**Evidence examined:**

- Payroll and payment record of 26 workers for the month of October 2022, April 2023, and September 2023.
- Production records for the month of September October 2022, April 2023, and September 2023.
- Wage slips of the workers
- Record of social security and EOBI reviewed.
- Record of group insurance
- Leave Record of the workers.

**Any other comments:**

NIL

**Summary Information**

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO

Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: 48.0	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 48.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 962.0 Per Week: 5770.0 Per Month: 25000.0	Actual Per Day: 962.0 Per Week: 5770.0 Per Month: 25000.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 200.0 Per Week: 200.0 Per Month: 200.0	Actual Per Day: 200.0 Per Week: 200.0 Per Month: 200.0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 workers for the month of October 2022, April 2023, and September 2023.		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
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 checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	PKR 25000/Month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 80.0% of workforce earning minimum wage 20.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: One Gross salary provided as bonus to workers. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Income Tax, EOBI		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	Income Tax, EOBI, Advance		
Please list all deductions that have not been made.	NIL		
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

<p>Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No</p>
<p>Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p>
<p>If yes, what was the calculation method used.</p>	<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  <input type="checkbox"/> Other – please give details:</p>
<p>Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory reviews wages annually when the local govt. revises minimum wages.</p>
<p>Are workers paid in a timely manner in line with local law?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Is there evidence that equal rates are being paid for equal work:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Through review of the wage records and workers interview it was noted wage rates are same for male and female workers and also for the same jobs, no discrimination in wage rates were noted</p>
<p>How are workers paid:</p>	<p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque  <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other</p>



**6 - Working Hours are not Excessive**  
**[Summary of Findings]**

**6: Compliance Requirements**

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Facility has defined working hours policy and procedure as per policy The Factory is committed to ensure working hours in compliance to legal requirements. Management ensures that regular working hours don't exceed 48 hrs per week and overtime hours don't exceed 12 hrs. per week. Management ensures that 7th day weekly rest is ensured. However, in case of "Urgent Business Needs" work can be performed on weekly rest provided all legal compliance is ensured.
  - o Urgent business needs can be considered in following business circumstances:
  - o Strike in the city and loss of production.
  - o Limited to delays / interruptions in production caused by Natural Calamities or unscheduled power failures.
  - o No repetitive production deadlines or unforeseen circumstances which are beyond employer's control".
- During audit it was noted that factory works in below mention shift schedule:
  - General Shift: 09:00 To 18:00 for management staff
  - General Shift timing: 08:00 To 17:00 hours – for workers
  - o Factory has installed card scanning system for recording the workers working hours in the factory.

**Evidence examined:**

- Factory policy and procedure for working hours in the factory
- 26 workers time record for the months of October 2022, April 2023, and September 2023.
- Production Records for the months of October 2022, April 2023, and September 2023.

**Any other comments:**

NIL

**Working hours' analysis**

**Systems & Processes**

What timekeeping systems are used?	Card Scanning for worker and staff
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
<b>Standard/Contracted Hours worked</b>	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Overtime Hours worked</b>	
Actual overtime hours worked in sample (State per day/week/month)	2 hours/day, 12 hours/week & 48 hours/month in September 2023
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No
Approximate percentage of total workers on highest overtime hours:	40.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Overtime wages shall be paid at double of actual rate, overtime is voluntary and all workers shall be requested in advance.
<b>Overtime premium</b>	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium  Please give details: 200% for normal day OT and 300 % for Gazetted holidays OT
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 200% of actual wage
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.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements  <input type="checkbox"/> Other
Please give details	Not Applicable
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <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)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**7 - No Discrimination is Practiced**  
**[Summary of Findings]**

**7: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Factory has defined discrimination policy and procedure and as per policy factory is not engage in or support discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, or political affiliation.
- During audit, through workers interview and documents review, no sign of discrimination was observed in the factory.
- During audit, it was confirmed that facility's environment is free from misbehavior activities, such as gesture, language and physical contact that is sexually coercive, threatening, abusive or exploitative.
- No discrimination policy is found posted on employee notification boards at production floors.
- Factory has equal employment opportunity policy.
- Facility has deployed Mr. Muhammad Tanveer –Compliance Manager for communicating, training, deploying and monitoring and ensuring the implementation of discrimination policy and procedure.
- Workers are hired, compensated & promoted based on capability and merit without any distinction, different social and ethnic background workers were found working in the factory.

**Evidence examined:**

- Policy and procedure for no discrimination
- Terms and condition of employment

**Any other comments:**

NIL

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 82.0%	Female: 18.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	5	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring  <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation  <input type="checkbox"/> Termination or retirement
	<input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found	
Please give details	No sign observed of discrimination during site tour, interview with workers and review policies and procedure	
<b>Professional Development</b>		
What type of training and development are available for workers?	Factory provides skilled development training to workers in provides education to female workers on different social topics. Also new workers were trained on job skills	

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)

Yes  No

**8 - Regular Employment Is Provided**  
[Summary of Findings]

**8: Compliance Requirements**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- During audit, it was noted that employment in the factory is based on recognized employment relationship established through national labour law & regulations.
- Factory has maintained employment contract of all workers in their personal files.
- No casual and seasonal were found hired in the factory during document review, facility visit and workers interview.

**Evidence examined:**

- Employment policy and procedure
- Terms and condition of Employments
- Personal files of the workers

**Any other comments:**

NIL

**Responsible Recruitment**

**All Workers**

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- Terms & Conditions presented       Understood by workers  
 Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- Yes     No

**Migrant Workers**

Type of work undertaken by migrant workers:

There is no migrant worker working at the facility

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no migrant worker working at the facility
Is there any observation on this finding?	There is no migrant worker working at the facility
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Non-employee workers</b>	
<b>Recruitment Fees</b>	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>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.)</b>	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	There is no agency worker working at the facility
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no agency worker working at the facility
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no migrant worker working at the facility
<b>Contractors (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.)</b>	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no contractor working at the facility
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no contractor working at the facility

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

**8A: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

Factory is not sub-contracting any of its operation

**Evidence examined:**

Factory is not sub-contracting any of its operation

**Any other comments:**

NIL

**Summary of sub-contracting – if applicable**

Is there any sub-contracting at this site?     Yes     No

**Summary of homeworking – if applicable**

Is homeworking used at this site?     Yes     No



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

**9: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

During document review, worker interviews and facility visit no sign of harsh and inhumane treatment was observed.

Factory has policy of progressive disciplinary action; no physical and mental abuses are used as disciplinary measures.

**Evidence examined:**

Factory policy and procedure  
Observation during walk through the facility  
Workers interview and discussion  
Management interview and discussion  
Records of factory disciplinary actions

**Any other comments:**

NIL

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No
If yes, are workers aware of these channels and have access? Please give details.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Joint workers management committee is present which discuss and resolves worker's issues with management and installed complaint boxes through which workers lodge their complaints.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>

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

**10A: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

During audit, no migrant worker was found working in the factory

**Evidence examined:**

Policy and procedure for employment in the factory  
List of workers  
Facility visit observed workers working on the floor

**Any other comments:**

NIL

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

**10B2: Compliance Requirements**

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Factory has established environmental policy and procedure in their manual; as per policy facility is committed and endeavoring to do environmental friendly and pollution curtailing textile business while continually improving its green practices and complying by all national as well as other laws and regulations.
- Factory has installed ETP plant for the treatment of effluent generated from washing process, the EPA has treatment capacity of 6,000 Gallon per day.
- Factory has conducted quarterly test of effluent parameters from external lab last test was conducted from SGS Lab on 29/09/2023, Report NO 6685453.
- Factory has conducted noise level test in the factory Test was conducted from SGS Lab on 18-09-2023 report NO EHS-5208607. Noise dB found min. 76 and max. 76dB.
- Ambient air quality test was conducted from SGS Lab on 12-09-2023 report NO EHS/5205607 and found under SEQS limits.
- The company has a comprehensive training program to train all relevant employees responsible for environmental practices. Last training was conducted on 16-10-2022.
- Facility has waste management policy and procedure; factory has contract with approved contractor for disposal of solid waste from factory. Factory ensures to prevent releases of harmful waste in the environment.
- Solid waste generated from the factory was disposed through approved contractor GEL Lab.
- Factory has obtained EPA NOC SEPA/ROK/GF24/244/22 valid till 22-02-2024

**Evidence examined:**

- Environmental policy and procedure
- Facility visit and review of the production process
- Review of the lab test reports for environmental compliance

**Any other comments:**

NIL

## Attachments



[Photo Record JMS TRADING Co.pdf](#)



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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:

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