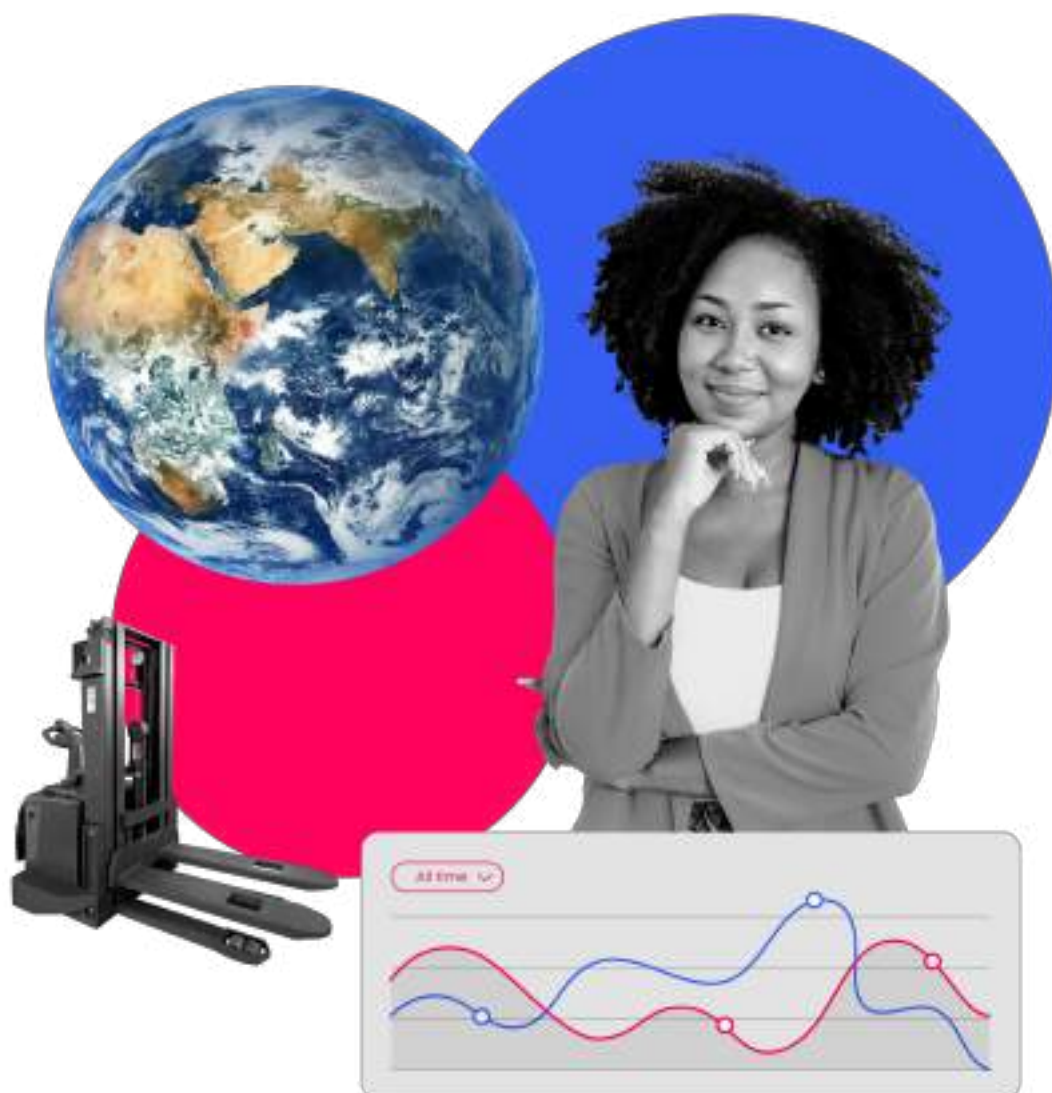


Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

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

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

Included in a 2-Pillar audit:

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

Included in a 4-Pillar audit:

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

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

Audit and site details

Audit details

Sedex company reference	ZC5000040618	Auditor company name	Intertek India
Date of audit	2024-10-29	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1000047728	Site name	R I EXPORTS PRIVATELIMITED
Business name	R I EXPORTS PRIVATELIMITED	Site address	244001 GATA NO-1394/1 & 1397/3, NEAR SIRSI RAILWAY CROSSING,MORADABAD ROAD,SIRSI,DISTT:- SAMBHAL (U.P) PIN-244301 SAMBHAL (U.P) PIN-244301, MORADABAD, IN
Site phone	9897906507	Site email	adil@riexports.com

Audit parameters

Time in and out	Day 1	
	In	09:05
	Out	17:08
Audit type	Full initial	
Was the audit announced?	Semi announced	
Was the Sedex SAQ available for review?	No	
Who signed and agreed CAPR?	Mr. Adil Ali / Director	
Any conflicting information SAQ/Pre-Audit Info	No	
Is further information available?	No	

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No Union Exists, No required by Law.		
Reason for absence during the audit	Worker representatives were busy in production work.		
Reason for absence at the closing meeting	No Union Exists, No required by Law.		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	Nil		
Lead auditor	Priency Agarwal	APSCA Number	21701009
Additional auditor	Jagriti Bhalla	APSCA Number	32400140
Date of declaration	2024-10-29		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Adil Ali
Title	Director
Date of declaration	2024-10-29





































Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.G Provide sufficient first-aid supplies ons...	§1	NC ZAF600703422
	3.N Maintain a log of all hazardous substance...	§2	NC ZAF600703423
	3.M Ensure all machinery is installed, mainta...	§3	NC ZAF600703424
	3.O Implement an appropriate electrical safet...	§4	NC ZAF600703426
9. No harsh or inhumane treatment is allowed	9.I Comply with all other applicable laws tha...	§5	NC ZAF600703425

Local law issues

§1	In accordance with the Factories Act 1948, Section 45 (3), each first aid box or cupboard shall be kept in the charge of a separate responsible person (who holds a certificate in first-aid treatment recognized by the State Government) and who shall always be readily available during the working hours of the factory.
§2	In accordance with Uttar Pradesh Factories Rules 1950, Rule 64, d) showers controlled by taps, or(e) circular troughs of the fountain type, provided that the Inspector may, having regard to the needs and habits of the workers, fix the proportion in which the aforementioned types of facilities shall be installed.(3) (a) Every trough and basin shall have smooth, impervious surface and shall be fitted with a waste-pipe and plug.(b) The floor or ground under and in the immediate vicinity of every trough, tap, jet, wash-basin, stand-pipe and shower shall be so laid or furnished as to provide a smooth, impervious surface and shall be adequately drained.
§3	In accordance with The Factories Act (1948) Section 21(1), In every factory the following, namely-(i) every moving part of a prime-mover and every flywheel connected to a prime-mover, whether the prime-mover or flywheel is in the engine-house or not; (ii) the headrace and tailrace of every water-wheel and water-turbine; (iii) any part of a stock bar which projects beyond the head stock of a lathe; and (iv) unless they are in such position or of such construction as to be safe to every person employed in the factory as they would be if they were securely fenced, the following, namely:- (a) every part of an electric generator, a motor or rotary convertor; (b) every part of transmission machinery; and (c) every dangerous part of any other machinery; shall be securely fenced by safeguards of a substantial construction which shall be constantly maintained and kept in position while the parts of machinery they are fencing, are in motion or in use:
§4	In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.
§5	THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013 21. Committee to submit annual report.— (1) The Internal Committee or the Local Committee, as the case may be, shall in each calendar year prepare, in such form and at such time as may be prescribed, an annual report and submit the same to the employer and the District Officer. (2) The District Officer shall forward a brief report on the annual reports received under sub-section (1) to the State Government.

Management systems

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



Not addressed



Fundamental improvements required







Some improvements recommended



Robust management systems

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

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000040618	
Sedex site reference	ZS1000047728	
Company name	R I EXPORTS PRIVATELIMITED	
Business ownership type	GOODS	
Site name	R I EXPORTS PRIVATELIMITED	
Site name in local language		
GPS location	GPS address	GATA NO-1394/1 & 1397/3, NEAR SIRSI RAILWAY CROSSING, MORADABAD ROAD, SIRSI, DISTT:- SAMBHAL(U.P.) PIN - 244301
	Coordinates	28 37 53 N 78 37 53 E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr. Adil Ali
	Job title	Director
	Phone number	9897906507
	Email	adil@riexports.com
Applicable business and other legally required business license numbers and documents	Factory License Number- UPFA73001704, Issue Date- 23.04.2024, Valid Till- 21.06.2026.	

Site activities

Site function	Factory Processing/Manufacturer
	Other
	Service Provider
	NA

Site activities

Site activities	Primary	Manufacture of prepared animal feeds
	Secondary	
	Other	
Product type	Manufacturer of pet food.	
Process overview	Manufacturer of pet food. Raw material, heating, cutting, packing & dispatch. Machine- activated carbon obsorber, boiler, dehiring machine, heat exchanger, metal detector, strapping machine, steam jacketed kattle, vertical band saw machine.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	4700m ²	
Building 1	Last construction works on site	2019
	If building is shared, provide details	Not Applicable
	Number of floors	1
	Description of floor activities	Ground Floor– office, raw material store, warehouse, oven, packing, cutting. Periphery – boiler, diesel generator, raw material store, guard room, Efullent treatment plant.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not provided No worker transport provided by the facility and it is not legally required.

Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	90-95%
	May	95-100%	June	95-100%
	July	90-95%	August	90-95%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%
Is there any night or back shift work at the site?	No			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No No negative impact assessed by the site.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No No Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	19 (86.4%)	3 (13.6%)	- -	22 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	19 (86.4%)	3 (13.6%)	- -	22 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

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

* % of total workforce

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

No migrant workers

Workers by age

	Men	Women	Other	Total
18 - 24 years old	2 (9.1%)	1 (4.5%)	- -	3 (13.6%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

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

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	68%	32%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	19 (86.4%)	3 (13.6%)	- -	22 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	0 (0%)	0 (0%)	- -	0 (0%)
Other	19 (86.4%)	3 (13.6%)	- -	22 (100%)

* % of total workforce

If other payment cycle entered, please provide details

Not applicable

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	4 (18.2%)	0 (0%)	- -	4
Supervisors or team leaders	2 (9.1%)	0 (0%)	- -	2
Administrative staff	2 (9.1%)	0 (0%)	- -	2

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Group interviews Individual interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	1 Group of 5 employees
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes
Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) Workers did not have any complaints
What did the workers like the most about working at this site?	Training and development Grievance mechanisms Freedom of movement
Additional comments	The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns to their grievance representative who would take it to the management.
Attitude of workers' committee/union representatives	Based on the interaction with workers committee representative, it was noted that workers committee representative is not discriminated, and their grievances stated by the workers were effectively solved by the facility management. Further no negative comments were received.
Attitude of managers	The facility management was found to be cooperative throughout the audit and accepted to take necessary corrective action for the non-compliances noted.

Workers interviewed by type

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

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	5	0	-	5
Workers interviewed individually	3	2	-	5

Migrant workers interviewed

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

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	3.0%	0.0%	-	3.0%
Last full calendar year (2023)	8.0%	0.0%	-	0.0%
Previous full calendar year (2022)	6.0%	0.0%	-	0.0%

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

Rate of absenteeism (%)*

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

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

Are accidents recorded?

Yes

Facility had maintained Form-26 & 15, however no accidents were occurred till date.

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

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

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

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

Lost day work cases (per 100 workers)*

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

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

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

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

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

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

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

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <ul style="list-style-type: none"> 1)Mr. Adil Ali is responsible for implementing standards concerning Human rights. 2)Facility has identified their stakeholders and salient issues. 3)Facility has measured direct, in-direct and potential impacts on stack holder’s human rights. Further remedial action was found in place. 4)Facility does have transparent system in place for confidential reporting and dealing with human rights impacts without fear of reprisal towards the reporter. 5)No discrimination related to human rights observed regardless of gender, nationality, place of residency, sex, ethnicity, religion, colour or and other categorization and all are treated equally. 6)No Slavery, forced labour and human trafficking observed. All employees are of Indian nationality. 7)Employees are free to quit if they are not willing to work. 8)The facility has policy on “Human Right” which is duly endorsed by Management and management representative is responsible for implementation. <p>Evidence Examined:</p> <ul style="list-style-type: none"> 1)Documented policy on human rights. 2)Supplier’s social compliance monitoring records. 3)Interaction with Management and Interview with employees. 		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current System-

- 1)Mr. Adil Ali (Director) is responsible to oversee that no forced, bonded, involuntary or prison labor is employed.
- 2)There was no presence of forced / bonded or prison labor at the workplace.
- 3)Employees are not required to lodge any deposits, identity papers with the facility before or after joining the services.
- 4)All interviewed employees reported that there are no such illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period of 01 month.
- 5)Employees are free to leave at the end of their shift and there is no compulsion to work overtime.

Evidence Examined:

- 1)Facility Policy on no forced, bonded or involuntary prison labour and Procedures.
- 2)Personal files with application form and bio data including employment contract.
- 3)Interaction with Management and Interview with employees.

1. Employment is freely chosen

Data points

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

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System-</p> <p>1) Mr. Adil Ali (Director) is responsible to ensure compliance with this code.</p> <p>2) Facility has not employed any foreign employees.</p> <p>3) Facility has not employed any agency labour.</p> <p>4) Facility has maintained personnel files for all sampled 10 employees with photocopies of documentation showing that they have local citizenship and do not need any special permission to work in India.</p> <p>Evidence Examined:</p> <p>1) Facility's Recruitment policies.</p> <p>2) Interaction with management and employees.</p> <p>3) Personal data files (10 personnel files were checked for proof of identity documentation).</p>		

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

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

Migrant workers

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

Recruitment fees

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

Were recruitment fees or costs identified during worker interviews? No

Based on interaction with employees, no recruitment fee is required at any stage of the recruitment process.

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals. 2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances. 3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews. 4. Monitoring system was found in place.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current system-

- 1) Mr. Adil Ali(Director) is responsible to ensure that 'Freedom of Association and Right to Collective Bargaining' is respected by the management.
- 2) Factory recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
- 3) Facility encourages and respects all employees' rights to join union freely.
- 4) At present, there was no union / trade union in the facility.
- 5) Facility has formed grievance committee to resolve workers grievances.
- 6) Facility has provided suggestion box through which employees can report grievances. Further, employees can also approach management with their grievance and adequate actions are taken.
- 7) There was no evidence of suppression of employees' rights.

Evidence examined:

- 1) Facility Policy on Freedom of Association and Right to Collective Bargaining and Procedures.
- 2) Interaction with Management and Interview with employees.
- 3) Last grievance committee meeting conducted on 11.09.2024.

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	No
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, however these policies and procedures are not reviewed at regular intervals. Also noted that there were Gaps in policies and procedures observed which reduce the likelihood of sustainable compliance with the Workplace Requirements in the Base Code Area over time.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Isolated cases of ineffective training and communication of procedures to relevant workers, including managers and supervisors which was evident through employee interviews.</p> <p>4. Oversights in the monitoring systems have been found.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.G Provide sufficient first-aid supplies ons...	§1	NC ZAF600703422
	3.N Maintain a log of all hazardous substance...	§2	NC ZAF600703423
	3.M Ensure all machinery is installed, mainta...	§3	NC ZAF600703424
	3.O Implement an appropriate electrical safet...	§4	NC ZAF600703426

Systems and evidence examined to validate this code section

Current Systems:

- 1) General Health and Safety management
 - Mr. Adil Ali (Director) is responsible for Health & Safety aspects for the site.
 - Drinking water was freely available in the facility and test certificates were up-to-date. Drinking water points were maintained in hygienic condition.
 - Sufficient number of toilets were available at all times for workers. Toilets were maintained in hygienic condition.
 - Ventilation, temperature and lighting were adequate in all section of the facility.
 - Housekeeping was found in good condition throughout the facility.
 - Construction of the building was found safe.
 - Facility has formed health and safety committee to resolve safety issues at site.
 - Adequate Personal Protective Equipment's (PPE's) were used by the employees working in production area.
 - Facility has provided a medical room within premises also, facility has not provided first aid training to employees and a finding has been raised.
- 2) Fire Safety
 - There were at least 2 exits from each work area from the building.
 - Facility has installed 31 fire extinguishers and 6 hydrant & 4 hose reels covering all section/floor of the site.
 - Fire extinguishers and hydrant & hose pipes were found in maintained condition.
 - Facility has installed 12 Fire alarm call points which were found in operational condition.
 - Facility has 10 emergency lights installed at site.
 - Evacuation maps were posted in all section/floor of the facility.
 - Fire drills were organized and recorded.
 - Facility has marked illuminated exit sign on all around the exits for employee's reference.
 - Facility has obtained Fire-NOC from local authorized body as required.
 - Fire safety training is provided to sufficient number of employees by competent person.
 - Evacuation Aisles were found marked in all required areas with directional arrows leading towards exit.
- 3) Machine & Electrical safety
 - All machines and electrical equipment's were found maintained in good condition.
 - Safety sign was posted near machines/equipment's for employee's reference.
 - Facility has not provided adequate safety guard on all required plant and machines and a finding has been raised.
- 4) Chemical safety
 - Facility does use chemicals in the production process.
 - Chemicals and Oil containers were found to have hazard and identification labels.
 - Material Safety Data Sheet (MSDS) in local language was found posted nearby chemical and oil storage area for employee's reference.
 - Adequate Personal Protective Equipment's (PPE's) were used by the employees handling chemical and oil.
 - Occupational health check-up was conducted for employees handling chemicals.
 - PPE's and chemical handling training was provided to the employees as required.
- 5) Medical Services
 - The facility has provided 2 first aid boxes. All required contents were well maintained in first aid box.

Evidence examined-

- 1) Health and Safety Policy.
- 2) Fire NOC of building issued on 04.09.2023 & valid for 3 years.
- 3) Industrial accident records – Updated and no accident occurred in since facility is operational.
- 4) First aid training was not provided to employees, and a finding has been raised.
- 5) Drinking Water Test conducted on 09.09.2024.
- 6) Fire Drill conducted once in every two months. Last drill was conducted on 04.09.2024, for employees present.
- 7) Firefighting equipment inspection conducted on monthly basis.
- 9) Personal Protective Equipment (PPE's) training and chemical handling training provided on 06.09.2024.
- 10) Interaction with Management and Interview with employees.
- 11) Health & safety committee meeting was last conducted on 11.09.2024.

Findings: non-compliances

ZAF600703422

Non-compliance

Due 2024-12-19

Code area

3 Working conditions are safe and hygienic

Status

Closed (2024-11-28)*

Workplace requirement

3.G Provide sufficient first-aid supplies onsite, and ensure that adequately trained personnel are available during all shifts.

Time given to resolve

30 days

Issue title

167 - No or inadequately trained first aiders

Verification method

Desktop audit

Description

It was noted during document review that factory had not trained any employees in first aid training from recognized by the state government agency or person. However facility has provided first aid training to 5 persons from MBBS doctor.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that factory should train employees in first aid training from recognized agency.

Local law reference

In accordance with the Factories Act 1948, Section 45 (3), each first aid box or cupboard shall be kept in the charge of a separate responsible person (who holds a certificate in first-aid treatment recognized by the State Government) and who shall always be readily available during the working hours of the factory.

* PDF generated at 11:11 (UTC) on 28 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600703423

Non-compliance

Due 2024-12-19

Code area

3 Working conditions are safe and hygienic

Status

Closed (2024-11-28)*

Workplace requirement

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

Time given to resolve

30 days

Issue title

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

Verification method

Desktop audit

Description

It was noted during the factory tour that the factory has not provided eye wash station near chemical store or near chemical in use areas.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended to the factory to provide Eye wash station near chemical store or near chemical in use areas.

Local law reference

In accordance with Uttar Pradesh Factories Rules 1950, Rule 64, d) showers controlled by taps, or(e) circular troughs of the fountain type, provided that the Inspector may, having regard to the needs and habits of the workers, fix the proportion in which the aforementioned types of facilities shall be installed.(3) (a) Every trough and basin shall have smooth, impervious surface and shall be fitted with a waste-pipe and plug.(b) The floor or ground under and in the immediate vicinity of every trough, tap, jet, wash-basin, stand-pipe and shower shall be so laid or furnished as to provide a smooth, impervious surface and shall be adequately drained.

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ZAF600703424

Non-compliance

Due 2024-12-19

Code area

3 Working conditions are safe and hygienic

Status

Closed (2024-11-28)*

Workplace requirement

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

Time given to resolve

30 days

Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

Verification method

Desktop audit

Description

It was noted during the facility tour that the facility has not provided pulley guard to 01 out of 02 cutting machines located in cutting section at ground floor.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended to the facility to ensure that all the machines equipped with safety guards.

Local law reference

In accordance with The Factories Act (1948) Section 21(1), In every factory the following, namely-(i) every moving part of a prime-mover and every flywheel connected to a prime-mover, whether the prime-mover or flywheel is in the engine-house or not;
(ii) the headrace and tailrace of every water-wheel and water-turbine;
(iii) any part of a stock bar which projects beyond the head stock of a lathe; and
unless they are in such position or of such construction as to be safe to every person employed in the factory as they would be if they were securely fenced, the following, namely:-
(a) every part of an electric generator, a motor or rotary convertor;
(b) every part of transmission machinery; and
(c) every dangerous part of any other machinery; shall be securely fenced by safeguards of a substantial construction which shall be constantly maintained and kept in position while the parts of machinery they are fencing, are in motion or in use:

Evidence



[Pulley Guard missing.JPG](#)



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ZAF600703426

Non-compliance

Due 2024-12-19

Code area

3 Working conditions are safe and hygienic

Status

Closed (2024-11-28)*

Workplace requirement

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

Time given to resolve

30 days

Issue title

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

Verification method

Desktop audit

Description

It was noted during the facility tour that the facility has not provided rubber mat under the electric panel located near ETP (Effluent Treatment Plant).

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended to the facility to provide rubber mat under all the electric panels.

Local law reference

In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.

Evidence



[Rubber Mat Missing.JPG](#)



* PDF generated at 11:11 (UTC) on 28 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Facility had obtained the Approved building layout plan Dated- 22.06.2019.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- 1) Mr. Adil Ali (Director) is responsible to oversee that no child is employed at site.
- 2) There was no evidence of child labor or young labor throughout the facility.
- 3) No juvenile workers (under the age of 18) are employed at the facility.
- 4) Age proof records were maintained in the form of Aadhar card and Pan card. Age proof was maintained for 10 out of 10 sampled employees.
- 5) As per available records, age of youngest worker was 25 years completed.
- 6) Based on the employee interviews, review of facility's Anti Child Labour & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.

Evidence examined:

- 1) Child Labor and Child Labor Remediation Policy.
- 2) Age Proof records of 10 of 10 selected samples.
- 3) Interaction with Management and Interview with employees.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	
Enter the legal age of employment	14
Enter the age of the youngest worker identified	25
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	
Percentage of workers that are apprentices, trainees or interns	
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals. 2. Facility has appointed Mr. Adil Ali (Director)who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances. 3.Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews. 4. Monitoring system was found in place.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems:

- 1) Mr. Adil Ali (Director) is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law.
- 2) Based on employee's interview, wages are fixed on monthly wage and paid once in a month.
- 3) All employees are paid on monthly basis through bank transfer by 7th of every month regularly in all the sampled months.
- 4) Based on employee's interview, it was noted that pay slip is provided to all employees regularly as per law.
- 5) Based on wage record review, all eligible employees are covered under social security benefit of Provident Fund (EPF), Employee State Insurance (ESI) & Labor welfare fund (LWF). Payment receipts for the same were found remitted on time as legally required.
- 6) Facility has extended Leave with Wage benefits to the employees. Leave with wage were found calculated accurately during full and final payment of left employees.
- 7) Deductions from wages as a disciplinary measure and any other illegal deductions are not permitted as per the facility rules.

Evidence examined:

- 1) Facility Policy on Wages and Benefits.
- 2) Wage record, Pay slip and Time records for 10 selected samples for 03 months i.e., September 2024 – Most Recent paid month, March 2024 – Random month and October 2023 – Random month.
- 3) Provident Fund (PF) remittance receipts.
- 4) Employee State Insurance remittance receipts.
- 5) Leave with wage records (Form No: 15).
- 6) Full and final Settlement paid records.
- 7) List of National and Festival Holidays (Form 1A).
- 8) Interaction with management and Employees.

5. Legal wages are paid

Data points

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

Worker remuneration

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

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

Actual overtime hours	Max hours per day	0.0
	Max hours per week	0.0
	Max hours per month	0.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	410.0
	Min per week	Non applicable
	Min per month	10648.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	410.0
	Actual per week	Non applicable
	Actual per month	10648.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	0.0
	Actual per day	0.0
	Actual per week	0.0
	Actual per month	0.0

Wage analysis

Number of workers' records checked	10
Provide the date and details of the records	•10 attendance records and payroll records for September 2024 (Most recent month), 10 attendance records and payroll records for March 2024 (Random month) and 10 attendance records and payroll records for October 2023 (Second Random month) were reviewed in this audit.

Are there different legal minimum/ legally recognised CBAs wage grades?	Yes The legal minimum wages applicable in the state of Uttar Pradesh as applicable to this facility till recent sampled month is as follows: Unskilled - INR 10648 per month, Semi-skilled - 11713, Skilled- 13120.
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	10648
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	Current Systems: Facility has calculated living wages and has done GAP analysis.		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1) Mr. Adil Ali (Director) is responsible for ensuring compliance with regular and overtime hours as per law.
 - 2) Facility has implemented biometrics attendance recording system to record IN/OUT time of all employees.
 - 3) "IN/OUT" time record was maintained for all 10 of 10 randomly selected employees.
 - 4) During audit process and review of records, working hours, overtime hours and weekly rest was found to be in compliance with the legal requirements.
 - 5) Facility has no compulsion on overtime work. It is purely voluntary.
 - 6) The shift timing is from 9am to 6pm and Sunday is a weekly off.
- Based on review of time records, the working hours could be summarized as follows:
- For September 2024 (recent month), the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).
 - For March 2024 (random month) the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).
 - For October 2023 (random month) the maximum working hours per week was 48 hours (48 hours regular + 00 hours overtime).

Evidence examined:

- 1) Facility Policy on regular and overtime hours.
- 2) In/Out time records for 10 selected samples for 03 months i.e., September 2024 – Most recent paid month, March 2024 – Random month and October 2023 – Random month.
- 3) Production records (from work floors to check for discrepancies).

6. Working hours are not excessive

Data points

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

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1) Mr. Adil Ali (Director) is responsible to check discrimination issue in the facility.
- 2) No discrimination reported / observed in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation.
- 3) All employees have fairly equal opportunity for training in their respective departments.

Evidence examined:

- 1) Facility Policy on No Discrimination.
- 2) Appointment letter with terms and conditions of employment for 10 out of 10 selected sampled employees.
- 3) Salary and other benefit records.
- 4) Interaction with management and employees.

7. No discrimination is practiced

Data points

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

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1) Mr. Adil Ali (Director) is responsible to ensure compliance with these code requirements.
- 2) Employment contracts (appointment letters) were available and maintained for 10 out of 10 selected employees. Terms and conditions of employment were clearly defined in appointment letter issued to the employees.
- 3) Facility does not follow and believe in the fixed term employment.
- 4) Facility understands recruitment process. All recruitment process are monitored by facility management only.
- 5) Facility does not employ any migrant workers.
- 6) Based on interaction with employees, no recruitment fee is required at any stage of the recruitment.
- 7) Photo identification card is issued to all the employees.

Evidence examined:

- 1) Facility Policy on Regular Employment.
- 2) Appointment letter with terms and conditions for 10 out of 10 selected samples.
- 3) Salary and other benefit records.
- 4) Interaction with management and Employees.
- 5) Full and Final records were maintained by the facility.

8. Regular employment is provided

Data points

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

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>At present, there is no subcontractorw and no home workers are used. All production processes are done in-house.</p> <p>Evidence examined:</p> <ol style="list-style-type: none"> 1) Facility Policy on Sub-Contracting and Homeworking. 2) Inward and outward material register. 3) Production records. 4) Interaction with management. 		

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

Data points

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

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
Facility ensures that the suppliers they use do not have any home working.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
Based on review of production records, the capacity with workers workload found balanced, hence no chance of unrecorded work hours.

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, however these policies and procedures are not reviewed at regular intervals. Also noted that there were Gaps in policies and procedures observed which reduce the likelihood of sustainable compliance with the Workplace Requirements in the Base Code Area over time.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
9. No harsh or inhumane treatment is allowed	9.I Comply with all other applicable laws tha...	§1	NC ZAF600703425

Systems and evidence examined to validate this code section

Current Systems:

- 1) Mr. Adil Ali (Director) is responsible to ensure no harsh or inhumane treatment is practiced in facility.
- 2) There is no evidence of harsh or inhumane treatment of employees.
- 3) All employees are treated with respect and dignity.
- 4) Facility's disciplinary policies are explained to all employees and all employees were well aware about their rights.
- 5) No evidence of physical abuse, sexual or any other harassment / verbal abuse is observed / reported.
- 6) Facility has a written disciplinary procedure that is displayed on the notice board of the facility.
- 7) Facility has formed Internal Complaint Committee (ICC Committee) to resolve grievance and harassment issues of female employee employed at site.
- 8) Facility has engaged external member – Advocate Surbhi Sharma in internal Complaint Committee.

Evidence examined:

- 1) Facility Policy on No Harsh or Inhumane Treatment.
- 2) Interaction with management and Employees.
- 3) ICC committee meeting record dated 11.09.2024. Annual return for ICC has not been submitted and a finding has been raised for the same.

Findings: non-compliances

ZAF600703425

Non-compliance

Due 2025-02-17

Code area

9 No harsh or inhumane treatment is allowed

Status

Closed (2024-11-28)*

Workplace requirement

9.I Comply with all other applicable laws that impose conditions on Code Area 9.

Time given to resolve

90 days

Issue title

587 - No sexual harassment committee where required by local law

Verification method

Desktop audit

Description

Based on records of review, it was noted that facility has not submitted POSH annual return to concern department.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended to facility that POSH annual return shall be submitted to concern department as per legal requirement.

Local law reference

THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013 21. Committee to submit annual report.— (1) The Internal Committee or the Local Committee, as the case may be, shall in each calendar year prepare, in such form and at such time as may be prescribed, an annual report and submit the same to the employer and the District Officer. (2) The District Officer shall forward a brief report on the annual reports received under sub-section (1) to the State Government.

* PDF generated at 11:11 (UTC) on 28 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
What type of grievance mechanism(s) are available?	Facility had effective grievance mechanism in place wherein workers, communities & suppliers can express their grievance through Suggestion box, Hot line, and open door policy.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Not applicable as this is a 4 pillar audit		

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	Facility does not have any environmental or energy management certificates.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <ol style="list-style-type: none"> 1. Mr. Adil Ali (Director) is responsible for all environmental issues. 2. Based on management interaction, facility and their suppliers are aware the environmental requirements. 3. Facility has a pollution consent to operate (Air and water) from pollution department. Facility having pollution consent under Hazardous waste management from pollution department found valid on the day of audit. 4. Facility is aware of the end client's environmental standards/code requirements. 5. Facility has documented environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 6. Facility conducted environment impact assessment and aware of the significant environmental impact of their site and its processes. 7. Facility is measuring use of natural resource like water, diesel and have target to reduce. 8. Facility is working continuously to reduce use of natural resources to improve in their environmental performance. 9. Facility have environment Policy & Environment certification. 10. Facility has completed the appropriate section of the SAQ and made it available to the auditor. 11. During review of records and interaction with management, it was noted that facility is not subjected to any fines/prosecutions for noncompliance to environmental regulations. <p>Evidence Examined:</p> <ol style="list-style-type: none"> 1) Facility Policies (Environmental Policy / Waste Management). 2) Interaction with management and Employees. 3) Air and Water Consent obtained dated 01.08.2024 valid till 31.07.2025. Facility having consent under hazardous waste management: dated 21.08.2022 to 30.08.2027. 4) Stack emission test and Noise assessment test & ambient air quality test report obtained on 03.05.2024. 5) Agreement with hazardous waste collectors "M/s. Bharat Oil Waste Management Limited has an agreement which was conducted on 06.09.2020 valid for 5 years. 6) Last waste disposal record dated 28.08.2024. 		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Responsible use and management of water
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Not Applicable
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes The site has reduction charges in place for environmental aspects.
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	No No subcontracting is being done.

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	14,626	14,521
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	Data not available	Data not available

Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	Ground Water	Ground Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	490	480
Water discharged	Data not available	Data not available
Water volume discharged (m3)	Data not available	Data not available
Water volume recycled (m3)	490	480
Total waste produced (mt)	295	310
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	295	310
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	220,000	245,000

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1. Facility has developed and maintained relevant policies and procedures to ensure Workplace Requirements are met, also these policies and procedures are reviewed at regular intervals.</p> <p>2. Facility has appointed Mr. Adil Ali (Director) who is responsible for implementing procedures. Systems are in place to ensure the management structure and responsibilities are reactive to changing circumstances.</p> <p>3. Training and communication of procedures to relevant workers, including managers and supervisors is effective which was evident through employee interviews.</p> <p>4. Monitoring system was found in place.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1) Mr. Adil Ali (Director) is responsible to ensure compliance and for implementing standards concerning Business Ethics.
- 2) Factory has established a written policies and procedures based on Business Ethics which concerned bribery, corruption, or unethical Business Practice.
- 3) Every department is responsible to conduct their business ethically without bribery, corruption, or any type of fraudulent business practice as stipulated in Business ethic policy.
- 4) Facility has communicated policy and procedures to prevent or avoid bribery, corruption and other unethical business practices to employees working at higher risk positions such as management, finance, purchasing and logistics.
- 5) All employees were aware of business ethics policy and procedures.

Evidence Examined:

- 1) Facility has developed policies on business ethics covering anti-corruption and anti-bribery including gift and gratuity and same is displayed in local language.
- 2) Facility has provided training to their staff including those in sales, purchasing and logistics on business ethics policy and procedure and reporting mechanism.

10.C. Business ethics

Data points

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

No

Provide any certified anti-bribery
management systems for the site

Attachments



[View of Production floor.JPG](#)



[Social Policy Displayed.JPG](#)



[Warehouse.JPG](#)



[View of Main Gate.JPG](#)



[View of Building.JPG](#)



[Suggestion Box.JPG](#)



[Toilets.JPG](#)



[Smoke Detector.JPG](#)



[Social Policies Displayed.JPG](#)



[Rubber Mat Missing.JPG](#)



[Raw Material Storage.JPG](#)



[Sand Bucket.JPG](#)



[Urinals.JPG](#)



[Pulley Guard missing.JPG](#)



[PPE Used by Employee.JPG](#)



[Production Floor.JPG](#)





[Production Floor.JPG](#)



[Hand Wash Station.JPG](#)



[Laboratory.JPG](#)



[Gender Based Toilets.JPG](#)



[Oven Area.JPG](#)



[Fire Extinguisher.JPG](#)



[MSDS Displayed.JPG](#)



[First Aid Box.JPG](#)



[Fire Hydrant & Hose reel.JPG](#)



[Evacuation Plan.JPG](#)



[Fire Alarm Hooter.JPG](#)



[Facility Name Board.JPG](#)



[Fire Alarm Call Point & Fire Extinguisher.JPG](#)



[Emergency Light.JPG](#)



[Fire Alarm Control Panel.JPG](#)



[Emergency Light Testing.JPG](#)





[Employees Locker.JPG](#)



[Emergency Exit Gate.JPG](#)



[ETI Code of Conduct.JPG](#)



[Electrical Panel.JPG](#)



[Effluent Treatment Plant.JPG](#)



[Drinking Water Point.JPG](#)



[Diesel Generator.JPG](#)



[Chemical Storage Area.JPG](#)



[Cutting Area.JPG](#)



[Aisles Marking in Production Floor.JPG](#)



[Child Labour Notice.JPG](#)



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