

Sedex Members Ethical Trade Audit Report

Version 7



Contents

[Audit content](#)

[Audit details](#)

[SMETA declaration](#)

[Summary of findings](#)

[Management systems](#)

[Site details and data points](#)

[Site details](#)

[Worker analysis](#)

[Worker interviews](#)

[Measure workplace impact](#)

[0. Enabling accurate assessment](#)

[1. Employment is freely chosen](#)

[1.A. Responsible recruitment and entitlement to work](#)

[2. Freedom of association and right to collective bargaining are respected](#)

[3. Working conditions are safe and hygienic](#)

[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](#)

[10.A. Environment 2-Pillar](#)

[Attachments](#)

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

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

2-pillar audits include:

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

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

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS1000084634	Site name	pukhraj gems exports pvt ltd
Business name	pukhraj gems exports pvt ltd	Site address	g 1/24 epip sitapura industrial area g 1/24 epip sitapura industrial area jaipur IN 302022

Audit details

Sedex company reference	ZC5000071317	Auditor company name	EUROCERT INSPECTION SERVICES PVT LTD
Audit company address	304,Mid Town Bussiness Park, Peermuchalla Behind Sector-20, PANCHKULA, IN, 140603		
Date of audit	2025-08-27	Audit conducted by	Anirudh Sharma
Audit pillars	Labour Standards Health and safety		
Time in and out	Day 1		
	In	09:10	
	Out	17:55	
Audit type	Full initial		

[← Contents](#)

[Findings →](#)

Was the audit announced? Semi announced

Was the Sedex SAQ available for review? No

Who signed and agreed CAPR? Mr. Apoorv Jain / 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	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	Union Representative not applicable		
Reason for absence during the audit	Union Representative not applicable		
Reason for absence at the closing meeting	Union Representative not applicable		

SMETA declaration

Auditor team

SMETA declaration

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

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

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

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

Semi announce audit 30 days window period

Lead auditor

Anirudh Sharma

APSCA Number

32200031

Additional auditor

Dinesh Nautiyal

APSCA Number

32200522

Date of declaration

2025-08-27

[← Contents](#)

[Findings →](#)

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. Apoorv Jain
Title	Director
Date of declaration	2025-08-27





































Summary of findings

Code area	Workplace requirement	Area of NC	Finding
0. Enabling accurate assessment	0.C Provide an accurate site description and ...	Local law Base code	NC ZAF601115127
2. Freedom of association and right to collective bargaining are respected	2.E Comply with all other applicable laws tha...	Local law Base code	NC ZAF601115125
3. Working conditions are safe and hygienic	3.B Conduct risk assessments regarding the po...	Base code	NC ZAF601115126
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601115128
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601115129
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law Base code	NC ZAF601115130

[← Contents](#)

[Management systems →](#)

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


[← Summary of findings](#)


[Site details →](#)

	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				

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000071317	
Sedex site reference	ZS1000084634	
Company name	pukhraj gems exports pvt ltd	
Business ownership type	GOODS	
Site name	pukhraj gems exports pvt ltd	
Site name in local language	Pukhraj Gems Exports Pvt Ltd	
GPS location	GPS address	g 1/24 epip sitapura industrial area,
	Coordinates	Latitude
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr. Apoorv Jain
	Job title	Director
	Phone number	9928079299
	Email	apoorv@pukhrajgems.com

[← Management systems](#)

[Worker analysis →](#)

Company and site details

Applicable business and other legally required business license numbers and documents

- (1) Factory license - RJ/35273 not more then 250 person and not more than 500 H.P. Valid till 31-12-2026.
- (2) Fire NOC - LSG/jaipur greater/firnoc/2025-26/53169 dt 21-06-2025 valid till 20-06-2027.
- (3) Air and Water Consent- F/9tech/jaipur(sanganer)/7506(1)/2023-2024/2432-2433 dt 12-01-2024 valid till 30-09-2033.
- (4) Layout approval - P-48927/CIFB/2023 dt 24-03-2023.
- (5) Stability certificate- P-48927/CIFB/2023 Issued by ER Ranjan Kumar Sinha B.E. (civil) dt 19-04-2024.
- (5) GST Registration- 08AACCP1707G1ZP DT 01-07-2017.
- (6) IEC Registration -
- (7) ESIC Registration - 15000197090000910
- (8) EPF Registration - RJRAJ0014608000

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of jewellery and related articles
	Secondary	
	Other	
Product type	Manufacture of jewellery and related articles	
Process overview	MAIN PRODUCT—jewellery	
	MAIN PROCESS—Designing, mold making, model waxing, casting, grinding , plating , quality checking, and packing.	
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?	2400m ²

[← Site details](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2022
	If building is shared, provide details	No this is not shared building
	Number of floors	3
	Description of floor activities	The factory is operating on 3 floors. Ground floor: Office, casting, waxing , creche. , First floor : Sampling, molding, grinding Second floor :QC, plating , packing Third floor : RO And Fire water tank Periphery area : security room , ETP plant , toilet, material washing
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 Facility has not provided transportation facilities, as all workers living nearby the facility.

[← Site details](#)

[Worker analysis →](#)

Work patterns

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

Is there any night 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
The facility has not been assessed for negative impacts on the human rights, lands, resources, territories, livelihoods, or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
Facility has not conducted human rights impact assessment till date.

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	132 (91.7%)	12 (8.3%)	- -	144 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	128 (91.4%)	12 (8.6%)	- -	140 (97.2%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	4 (100%)	0 (0%)	- -	4 (2.8%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

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

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from Bihar, Uttar Pradesh, Uttarakhand

Workers by age

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

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? No

Describe how this may vary during peak periods No peak season

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	92%	8%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	132 (91.7%)	12 (8.3%)	- -	144 (100%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	132 (91.7%)	12 (8.3%)	- -	144 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

None

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	4 (66.7%)	2 (33.3%)	- -	6
Supervisors or team leaders	6 (100%)	0 (0%)	- -	6
Administrative staff	4 (66.7%)	2 (33.3%)	- -	6

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

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

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

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

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

Number and size of group interviews 04 Group of 05 and 06 Individual

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

[← Worker analysis](#)

[Measuring workplace impact →](#)

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

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

Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

No complaint raise by workers.

What did the workers like the most about working at this site?

Equal opportunities
Facilities (e.g. rest area, recreation, canteen)
Freedom of movement
Grievance mechanisms
Hours worked, rest days or breaks
Job security
Pay
Social activities and events
Work environment – comfort (e.g. temperature, noise or dust levels)
Workplace benefits (e.g. child care provisions)

Additional comments

Total of 26 employees were selected for interview. All of them spoke freely of their views for the facility. All employees said that they were satisfied with their employment practice, current wages structure and working environment in the facility. They reported freedom to leave after proper notice period. Most of the interviewed workers were found coming from nearby places. They have good relationships with their supervisors who treated them with respect. They were able to make suggestions to their supervisors and floor in-charge. They were able to complain directly to their supervisors and also felt free to raise their general concerns to their workers representatives and even directly to the management.

Attitude of workers' committee/union representatives

There was no union at site. Facility has formed workers committee, grievance Committee and health & safety committee to resolve workers grievance. During interaction with the workers representatives, it was noted that there was no restriction from the management and they were allowed to do their works committee related task independently in required manner. There was no discrimination reported at the time of interaction with the workers representatives

[← Worker analysis](#)

[Measuring workplace impact →](#)

Attitude of workers

Attitude of managers

The facility management showed a positive attitude to this audit during the whole process. All documentation requested for review was provided. Locked areas encountered during the audit were unlocked timely. At the end of the audit, all the non-compliance were accepted by the facility. No negative information reported.

Workers interviewed by type

	Total
Permanent workers	22
Temporary or fixed-term employees	0
Agency or subcontracted workers	4
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	18	2	-	20
Workers interviewed individually	4	2	-	6

[← Worker analysis](#)

[Measuring workplace impact →](#)

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)	16.0%	4.0%	-	10.0%
Last full calendar year (2024)	10.0%	3.0%	-	6.5%
Previous full calendar year (2023)	8.0%	3.0%	-	5.5%

* 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)	20.0%	4.0%	-	12.0%
Last full calendar year (2024)	15.0%	5.0%	-	10.0%
Previous full calendar year (2023)	14.0%	5.0%	-	9.5%

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

Are accidents recorded? Yes

Facility has maintained accident register and no accident occurred till date.

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

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

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

Lost day work cases (per 100 workers)*

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

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

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

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

[← Worker interviews](#)

[Code area 0 →](#)

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

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

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

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
0. Enabling accurate assessment	0.C Provide an accurate site description and ...	Local law Base code	NC ZAF601115127
Systems and evidence examined to validate this code section	<p>Current System:-</p> <ol style="list-style-type: none"> 1. Auditor conducted and complete the audit without obstruction to all requested documents, interviewees and the facility tour. Facility has provide genuine and authentic records. 2. Facility does not offer bribes to or threaten the auditor, nor in any way induce the auditor to be dishonest. 3. Facility has obtained the Business license . 4. Facility have written human rights policy statement that is approved at the most senior level, communicated to all personnel, and trained to relevant personnel. "5. Facility has displayed all the policy in notice board and not communicate to all the stockholders. 6. Facility has Registered in Social insurance ESIC and EPF 7. The facility has not obtained a certified standing order; however, the facility has applied for the same on dt 14-08-2025. <p>Evidence Examined :-</p> <ol style="list-style-type: none"> 1. SAQ 2. Code of Conduct. 3. License and permits. 4. Human right policy. 5. Antibribery policy. 6. ESIC Registration 7. EPF Registration 		

Findings: non-compliances

ZAF601115127

Non-compliance

Due 2025-10-27

Code area

0 Enabling accurate assessment

Status

Open*

Workplace requirement

0.C Provide an accurate site description and Sedex site profile declared prior to or during the audit.

Time given to resolve

30 days

Issue title

34 - Site is operating without all required in-date licences and permits (e.g. business/factory licence has expired)

Verification method

Desktop audit

Description

During documents review and management interaction it was noted that facility has not obtained certify standing order, however facility has applied on dt 14-08-2025.

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

It is recommended facility to obtained certify standing order.

Local law reference

Employment (Standing Orders) Act, 1946, which requires employers in industrial establishments with 100 or more employees to formally define employment conditions and get their draft standing orders certified by a Certifying Officer.

* PDF generated at 08:36 (UTC) on 01 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 0](#)

[Code area 1 →](#)

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

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

Management systems

Explanation for management systems grades

1. The site has no documented policy prohibiting modern slavery or forced labour. There is no reference to responsible recruitment practices, and no procedures exist to assess risks of human trafficking or debt bondage within their recruitment supply chain. The absence of a modern slavery statement also highlights the lack of awareness at management level.
2. An HR manager has been designated to oversee compliance with labour practices, but no specific person is responsible for managing forced labour risk or monitoring third-party recruitment. The site uses a third-party agency but does not regularly assess them for modern slavery risks. No formal due diligence system is in place, though basic vetting documents are kept on file.
3. There is no evidence of training on modern slavery, workers' rights, or ethical recruitment provided to either management or workers. Worker interviews revealed confusion about employment terms, wage deductions, and the right to resign freely, indicating the absence of awareness-raising or access to grievance channels regarding these matters.
4. There are no internal audits or monitoring systems in place to detect indicators of forced labour, such as withholding of documents, wage manipulation, or involuntary overtime. No system exists to collect data or analyze risks from third-party recruitment or internal departments, despite the known use of migrant and contract labour at the site.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section

1. Employment is freely chosen

Current System :-

1. No any evidence Forced labor, human trafficking, debt bondage/ bonded labor or any other form of modern slavery.
2. Facility does not any threats, penalties, coercion, physical force, violence, or harsh or inhumane treatment.
3. No any restrict workers' freedom of movement, leave the premises, taking the break and no any control by any security personal and cctv monitoring. Employees are free to leave at the end of their shift and there is no compulsion to work overtime.
4. No any accommodation and transportation provided and no any control for workers social interaction, talking others and no any isolation.
5. No any Original documents kept by facility.
6. All employee can terminate their services any time with 30 days legal notice period.
7. Payment to worker's on monthly basis on or before the 7th of every month as required by law.
8. No debt paid to workers.
9. Workers are not charge withhold wages or deposit any fee or original documents.
10. No collective bargaining agreements however workers are received payment above the legal minimum wages.
11. Facility does not hired any prison and involuntary labor.
12. Facility has obtained all the required permits and licenses that impose conditions. on this code area.
13. ETI code of conduct was communicated.

Evidence examined :-

1. Policy and procedure for no forced labor.
2. Appointment letter of 26 sample workers.
3. CCTV monitoring.
4. Management and Workers Interaction
5. Training record.
6. Fine deduction register.
7. ETI base code training and communication dt 26-09-2024.
8. Interaction with management, workers, and security personnel.

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	Fundamental Improvements Required
--	-----------------------------------

Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
--	-----------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
---	-----------------------------------

Management systems

Explanation for management systems grades

1. The site lacks documented recruitment policies addressing eligibility to work or responsible recruitment. Existing procedures are either outdated or incomplete. For example, while identity documents are checked for directly employed workers, there is no consistent system to verify third-party workers' eligibility. Site relies on verbal agreements with labour providers, but no contractual clauses mandate compliance with recruitment laws.
2. HR personnel are assigned to check worker eligibility , but there is no dedicated role for overseeing recruitment agency vetting or ethical recruitment oversight. Staff are familiar with basic verification practices but have not received training on international standards .
3. Workers were not provided full and clear information at the time of hiring. Interviews revealed migrant workers signed employment agreements post-arrival, some in a language they did not understand. No structured training on worker rights or ethical recruitment exists.
4. There is no documented system to verify that third-party labour providers follow ethical recruitment practices. The site does not retain recruitment records for subcontracted workers, nor does it conduct audits or random checks. Where recruitment records exist, they are incomplete or unsigned.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 1](#)

[Code area 2 →](#)

Systems and evidence examined to validate this code section

Current System:-

1. facility has established the migrant worker and recruitment policy, which is signed by top management.
2. Facility has not employed any migrant workers and foreign employees.
3. Facility issued appointment letter during the recruitment and all the terms like nature of work, working conditions, living conditions, employment terms, living costs, wages and benefits accurately reflect those communicated to workers during recruitment.
4. No any young workers employed.
5. No any agency and contractor at the facility.
6. Facility hired workers directly.
7. No any recruitment fee provision for hiring process it is verified workers interview also.

Evidence Examined:-

1. Policy and procedure.
2. Appointment letter.
3. Personal file documents. Selected 26 Sample
4. Workers and Management interaction.

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes? Workers are recruited, selected, and hired directly by our company

How do the labour providers recruit and hire workers? N/A - Recruitment providers not used

Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey? 0

Are there any subcontracted workers (excluding dispatched labour) on site? No

Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview? Yes

Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review? Yes

Migrant workers

Do any workers migrate across international borders to work at this site? No

[← Code area 1.A](#)

[Code area 2 →](#)

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? No
No any fee and cost paid by worker during the recruitment and employment

Were recruitment fees or costs identified during worker interviews? No
No

[← Code area 1.A](#)

[Code area 2 →](#)

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	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

Management systems

Explanation for management systems grades

1. The site does not have a documented policy supporting the right to freedom of association or collective bargaining. There is no reference to legally permitted worker organisations or internal grievance rights related to union activity. Management confirmed that union formation is not encouraged and worker committees are inactive or management-led.
2. HR Manager is informally responsible for supporting worker representation, but their role is undefined in practice. While there is some awareness at managerial level, no designated officer is trained to actively support worker organising or monitor functioning of worker bodies. Management is reactive, not proactive, in supporting this code area.
3. There is no structured training for workers or managers regarding the right to freedom of association. Interviews revealed that most workers were unaware of how to raise collective concerns or participate in worker forums. Information on their rights is not included in induction materials, contracts, or handbooks.
4. The site does not monitor the functionality of worker committees or effectiveness of grievance systems. There are no meeting minutes, no KPIs to assess worker voice, and no trend analysis of worker issues. Where worker representatives exist, they are chosen by management and not elected independently.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
2. Freedom of association and right to collective bargaining are respected	2.E Comply with all other applicable laws tha...	Local law Base code	NC ZAF601115125

[← Code area 1.A](#)

[Code area 3 →](#)

Systems and evidence examined to validate this code section

Current system :-

1. Facility has established the Freedom of association and collectively bargaining policy it is signed by Top Management.
2. The facility has formed a grievance committee, and meetings are also conducted once every 3 months; however, the workers' committee has not been formed through an election process. It has also been verified through document review and worker interview .
3. Factory recognizes and encourages the right to freedom of association and collective bargaining under the law provision.
4. facility encourages and respects all employees' rights to join union freely.
5. 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.
6. There was no evidence of suppression of employees' rights
7. Training provided to workers rep' representatives, no interference by the management to conduct meeting .
8. facility follows the model standing order.

Evidence Examined:-

1. Policy and procedures
2. Workers committee formation record.
3. Minutes of meetings record.
4. Training record.
5. Management and workers Interaction.

Findings: non-compliances

ZAF601115125

Non-compliance

Due 2025-11-26

Code area

2 Freedom of association and right to collective bargaining are respected

Status

Closed (2025-11-01)*

Workplace requirement

2.E Comply with all other applicable laws that impose conditions on Code Area 2.

Time given to resolve

60 days

Issue title

835 - Legal requirements relating to worker committees are not met

Verification method

Desktop audit

Description

During documents review , workers representative interview and management interaction it was noted that facility has not formed workers committee through election process.

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

It is recommended facility to formed workers committee through election procedure.

Local law reference

THE INDUSTRIAL DISPUTES ACT, 1947

CHAPTER II AUTHORITIES UNDER THIS ACT

3. Works Committee.—(1) In the case of any industrial establishment in which one hundred or more workmen are employed or have been employed on any day in the preceding twelve months, the appropriate Government may by general or special order require the employer to constitute in the prescribed manner a Works Committee consisting of representatives of employers and workmen engaged in the establishment so however that the number of representatives of workmen on the Committee shall not be less than the number of representatives of the employer. The representatives of the workmen shall be chosen in the prescribed manner from among the workmen engaged in the establishment and in consultation with their trade union, if any, registered under the Indian Trade Unions Act, 1926

* PDF generated at 08:36 (UTC) on 01 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 2](#)

[Code area 3 →](#)

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	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

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

Management systems

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

Fundamental Improvements Required

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

Fundamental Improvements Required

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

Fundamental Improvements Required

Monitor the effectiveness of procedures to meet policy and workplace requirements

Fundamental Improvements Required

Explanation for management systems grades

1. The site has undocumented procedures in place for key health and safety requirements under Code Area 3 , but these procedures are not formally documented or maintained. Evidence from interviews and site observation triangulates that some procedures are practiced , but lack formal documentation, structured updates, or consistent policy implementation across all shifts and departments.
- 2 A manager is nominally assigned responsibility for health and safety, but their role lacks the required seniority, authority, or resources to effectively implement and monitor procedures across all shifts. In addition, responsibility allocation is not clearly documented or embedded in job descriptions or organograms.
3. Training on health and safety is inconsistent or undocumented. Some workers were not aware of basic H&S procedures or reported not receiving any induction training. Records of training are incomplete or missing, and there is no structured training calendar.
4. Although some monitoring activities are carried out , there is no comprehensive system to evaluate the effectiveness of procedures or implement corrective actions based on data . Monitoring is informal, undocumented, or lacking follow-up actions.

[← Code area 2](#)

[Code area 4 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.B Conduct risk assessments regarding the po...	Base code	NC ZAF601115126
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601115128
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601115129

Systems and evidence examined to validate this code section

Current System:-

1. General Health and Safety management

- The facility has established a health and Safety policy and procedure signed by top management.
- The proprietor is responsible for Health & Safety and code implementation.
- Drinking water was freely available in the facility and test certificates were up-to-date. Drinking water points were maintained in hygienic condition and RO water provided.
- Sufficient number of toilets were available at all times for workers 04 for male and 04 for female .
- 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 obtained the stability certificate from competent person.
- Facility has formed health and safety committee to resolve safety issues at site 05 member from the management side and 05 members from the workers' side; committee meetings conducted once every three month.
- Adequate Personal Protective Equipment's (PPE's) were used by the employees working in production area. .
- Facility has conducted test for Noise, Ambient air quality, Lux level etc.
- Personal protective equipment provided by the facility .
- Health and safety risk assessment conducted as per process and updated once in 6 months.However, it has not included expecting mothers, ergonomic risk, and general health risk considering the transmittable and non-transmittable diseases.
- Emergency repose plan established for fire, earthquake, storm,
- Facility has maintained the Accident Register Form-23.

2. Fire Safety

- There were at least 2 exits from each work area from the building .
- The facility has installed 13 industrial emergency lights at the site. and the emergency exit was properly marked and illuminated for the employees' reference.
- The facility has installed total 04 fire alarm call points (MCP) , except in the lunch area, and all 4 alarms were found in operational condition. The last inspection was also done, and the record was available for review .
- The facility has installed 15 fire extinguishers and has 05 fire trainees on the site; all

extinguishers were found in maintained condition, and a monthly inspection was also conducted and recorded .

-Facility has installed 20 smoke detectors, 04 fire hydrant and 04 hose reels at the site .

-Evacuation maps were posted in all required area of the facility except the canteen area.

-Fire drills was organized and recorded as per the local law. last drill was conducted on Dt:- 08-08-2025

-Facility have obtained Fire-NOC from local authorized body

-Fire safety training was provided to the employees by a competent person.

-Aisles route were missing there.

3. Machine & Electrical safety

-All machines are well-maintained, and the last preventive maintenance was also done and recorded.

- All Electrical equipment was maintained in good condition.

- Safety signs were posted near machines/equipment's for employee's reference. and last preventive maintenance plan is evident

4. Chemical safety

- The facility has used chemicals in the plating process and for metal washing. purposes

- MSDS list was displayed at the chemical store.

- The facility has provided appropriate PPE and chemical handling training.

- health checkup conducted by the facility for their workers who work in the chemical area.

5. Accommodation-

No accommodations provided by the facility.

6. Transportation

- No transportation provided by the facility.

7. Medical Facilities

- A total of 05 first aid box was available with adequate first aid contents at the site during the audit day, and 5 trained people were available during the working day.

- facility has maintained the Accident Register Form-23.

- Nurse is not required as per law; however, the facility has an agreement with the nearest hospital.

- The facility has provide first-aid training to its workers, as was also verified by

worker interviews and document review.

Evidence Examined:

1. Health and safety Policy and procedure
2. Fire NOC
3. Stability certificate
4. Drinking Water Test report.
5. Health and safety committee . Last meeting record dt 04-08-2025
6. Health and safety Training last training dt 12-08-2025
7. PPE Training record , last raining conducted dt 14-07-2025.
8. PPE issued record register.
9. Noise test , Ambient test, Lux test
10. First aid Training record.
11. Accident register Form -23 no accident occurred till date.
12. Risk assessment record dt - 11-05-2025
13. Firefighting Equipment Inspection Record.dt- 25-07-2025
14. Machine maintenance record .
15. Fire drill record dt 08-08-2025
16. Fire Training record dt 16-08-2025.
17. Fire equipment inspection record dt 17-07-2025.
18. Chemical handling training record 15-07-2025.

Findings: non-compliances

ZAF601115126

Non-compliance

Due 2025-10-27

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-11-01)*

Workplace requirement

3.B Conduct risk assessments regarding the potential hazards arising from work. The risk assessment shall be reviewed whenever processes change and at least annually considering any incidents and findings.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

152 - Health and safety risk assessment conducted, but not suitable, sufficient and/or documented

Area of non-compliance/non-conformance

Base code

Description

During the review of document and interaction with the management it was noted that, Health and Safety risk assessment was conducted on 26/08/2023 however it was not that it has not included expecting mothers, ergonomic risk and genera health risk considering the transmittable and non-transmittable diseases.

Corrective and preventative actions

It is recommended facility to include expecting mothers, ergonomic risk and genera health risk considering the transmittable and non-transmittable diseases.

Evidence



[Risk assessment \(2\).pdf](#)



* PDF generated at 08:36 (UTC) on 01 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

ZAF601115128

Non-compliance

Due 2025-10-27

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-11-01)*

Workplace requirement

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

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

214 - No evacuation plan or designated emergency exit route

Area of non-compliance/non-conformance

Local law

Description

During facility tour it was noted that evacuation plan was not displayed in lunch area further noted that aisles marking was missing.

Base code

Corrective and preventative actions

it is recommended facility to display evacuation plan and mark aisles at lunch area.

Local law reference

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

Evidence

[← Code area 3](#)

[Code area 4 →](#)



No aisels.jpeg



* PDF generated at 08:36 (UTC) on 01 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601115129

Non-compliance

Due 2025-10-27

Code area	Status
3 Working conditions are safe and hygienic	Closed (2025-11-01)*
Workplace requirement	Time given to resolve
3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.	30 days
Issue title	Verification method
192 - Absence of functional fire alarms/smoke detectors	Desktop audit
Description	Area of non-compliance/non-conformance
During facility tour it was noted that no fire alarm call point (MCP) installed in lunch area.	Local law
	Base code
Corrective and preventative actions	
it is recommended facility to install fire alarm call point (MCP) at lunch area.	

Local law reference

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

* PDF generated at 08:36 (UTC) on 01 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes The facility has used chemicals in the plating process and for metal washing.
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes The facility has an approved layout plan and stability of the current structure.
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

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? No

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
--	-----------------------------------

Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
--	-----------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
---	-----------------------------------

Management systems

Explanation for management systems grades

1. The site does not have adequate documented policies or procedures in place to prevent child labour, verify worker age, or address the employment of young workers. Any procedures that do exist are either informal, not written, or do not apply to all types of workers. In addition, there is no written child labour remediation plan in place as required by international standards and Workplace Requirement.
2. The site has assigned responsibility for child labour policies to a relevant manager. The role is generally understood and documented. However, there are minor issues in implementation, authority, or coordination, particularly in relation to overseeing third-party or subcontracted workers.
3. The site does not provide sufficient training or communication to managers, supervisors, or workers about child labour prevention, age verification processes, or youth worker rights. Training is either missing, undocumented, or ineffective. As a result, key personnel may unknowingly violate legal or policy requirements.
4. There is no formal monitoring system in place to track implementation or effectiveness of procedures related to child labour. There is no system to audit age verification documentation, check on-site conditions of young workers, or monitor third-party compliance.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 3](#)

[Code area 5 →](#)

Systems and evidence examined to validate this code section

Current System

1. Facility established the No Child labor and remediation policy in line with ILO guidance and local legal requirements.
2. No worker is under the age of 15 years' old or the local legal requirement.
3. Age proof documents available of all sample employees.
4. Facility has employed all employees above the 18 years and no young workers employed at the facility.
5. Facility comply the applicable law that imposes condition of this code area.

Evidence Examined:-

1. No child labour and remediation policy.
2. Age Proof documents of all 26 sample employee.
3. Facility tour and workers interaction.
4. Training of supervisors, managers, and hiring personnel.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	20
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
--	-----------------------------------

Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
--	-----------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
---	-----------------------------------

Management systems

Explanation for management systems grades

1. The site does not have comprehensive or documented wage-related policies and procedures in place. Existing practices related to wage payments, deductions, benefits, or communication of pay are inconsistently applied or entirely undocumented. For example, there is no written procedure for verifying minimum wage compliance across all worker types, or for ensuring legal deductions are authorized. In some cases, policies contradict legal requirements, and procedures for issuing payslips or communicating pay rates are missing or unclear.
2. The site has designated a responsible manager to oversee payroll and wage compliance. This role is documented and generally understood within the organisation. However, some responsibilities are not clearly delegated or integrated across departments, or the responsible individual may lack sufficient training on newer wage laws or agency oversight requirements.
3. The site does not have a structured or documented training plan for wage and benefits policies. Workers are not provided with understandable information on their wages, pay periods, overtime, or deductions at the time of hiring or when changes occur. Management and payroll staff have not received recent or formal training on wage laws, legal entitlements, or payslip transparency. Interviews with workers and supervisors revealed widespread misunderstanding of entitlements such as paid leave, benefits, and deductions.
4. There is little or no evidence that the site systematically monitors wage compliance. Pay records are incomplete, missing, or inconsistent with working hour records, making it difficult to verify minimum wage compliance or benefit payments. There is no documented internal audit or sampling process to regularly check payroll accuracy, nor any corrective action tracking. Wage issues raised during interviews are not reviewed or addressed formally.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
-----------	-----------------------	------------	---------

No findings

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

Current systems:

1. Facility established the Wages and benefit policy and signed by top management.
2. HR Manager is responsible to ensure that all employees are paid legal minimum wages with all legal benefits on time as per law.
3. Workers were paid at above the legal minimum wage and no any collective bargaining agreement (CBA) exists,
4. Based on the interview, all eligible employees are covered under social security benefit of Provident Fund (PF) and Employee State Insurance Fund (ESI).
5. No any partial payments with in-kind benefits paid by the facility.
6. No any illegal deduction from workers pay is for disciplinary sanctions. and workers were not paid below the legal minimum wage. Facility were provided pay slip with information to understand any earned wage and deductions.
7. Workers were remunerated for all time worked, including meetings and essential training. Meetings and essential training shall take place at no cost to the worker and during remunerated working hours.
8. Facility Provide all workers with Pay slip clearly written information, in a language workers understand, outlining wage information, rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave before the disbursement of the wages.
9. Based on employee's interview, wages are fixed on monthly wage and paid once in a month. All employees are paid on monthly basis through bank transfer by 7th of every month regularly in past 12 months.
10. Facility has extended Leave with Wage benefits to the employees. Leave with wage were found calculated accurately during full and final payment of employees record was available for review.

Evidence Examined.

1. Wages and benefit Policy and procedure.
2. Wage records, Pay slip and Time records for selected samples for 03 months i.e. July -25, May -25, September -24 were available for review.
3. Provident Fund (PF) remittance receipts.
4. Employee State Insurance (ESI) remittance receipts.
5. Leave with wage records was available for review.
6. Full and final settlement paid records was available for review.
7. List of National and Festival Holidays.
8. Interaction with management and Employees.
9. Minimum wages Govt Notification.
10. Holiday list.
11. Training record.
12. Fine and deduction Register.

[← Code area 4](#)

[Code area 5.A →](#)

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	<p>The legal minimum wage</p> <p>Wages are based on job skills and experience</p> <p>Wages meet a living wage</p>
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
--	----------------

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

[← Code area 4](#)

[Code area 5.A →](#)

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	285.0
	Min per week	Non applicable
	Min per month	7410.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	7410.0
Minimum legal overtime wage	Min per hour	71.25
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual minimum overtime wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	26
Provide the date and details of the records	<p>26 Sample from 01 July 2025 to 31st may 2025</p> <p>26 sample from 01 may 2025 to 31st may 2025.</p> <p>26 Sample from 01 Sep 2025 to 30 Sep 2024 .</p> <p>Details of the record which is available for review</p> <p>Wages register, Time record, Pay slip, Leave register, Bonus register, List of holiday, Advance register, Fine deduction and damage, production record,</p>
Are there different legal minimum/ legally recognised CBAs wage grades?	<p>Yes</p> <p>Unskilled :- 7,410 INR per month</p> <p>Semi Skilled Class :- 7,722 INR per month</p> <p>Skilled Class -8,034 INR per month</p>
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Below legal minimum
Indicate the breakdown of workforce per earnings	100 % employee are paid above the legal minimum wages.
Are there any bonus schemes used?	<p>Yes</p> <p>8.33% bonus on total basic earning paid annually. Last Bonus for the year 2023-2024 was paid on Oct-2024 on the occasion of Diwali.</p>

[← Code area 5](#)

[Code area 5.A →](#)

Were accurate records shown at the first request? Yes

Were any inconsistencies found? No

[← Code area 5](#)

[Code area 5.A →](#)

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System:-</p> <ol style="list-style-type: none"> 1. Facility has established Wages and benefit Policy and procedure. 2. HR Manger is responsible for the code implementation. 3. Facility has calculate the Living wages of employees survey as per ILO principle and Anker methodology facility calculate the net living wages Rs. 7000 INR and facility paid Rs. 7450 INR . 4. This living Methodologies to estimate living wages should be based on an identification and assessment of a basket of goods, using local prices of the costs of at least the following components: food, housing, health and education, and other necessary goods and services, in accordance with national circumstances. This basket should provide for a decent living standard of the worker and his/her family. For some elements in this basket,. 5. Living wage gap analysis conducted and facility paid above the calculated living wage . 6. Facility has Paid more than minimum wages and calculated a living wage; therefore, there is no need to wages improvement plan. <p>Evidence examined</p> <ol style="list-style-type: none"> 1. Policy and procedures. 2. Living wages calculation and analysis. 3. Wages record. 4. Time record. 5. Workers Interview and management interaction. 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
--	-----------------------------------

Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
--	-----------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
---	-----------------------------------

Management systems

Explanation for management systems grades

1. The site does not have adequate or documented policies or procedures to ensure that working hours remain within legal or SMETA limits. In many cases, existing procedures are undocumented or not aligned with the requirements of WRs 6A to 6G. For example, there are no clear guidelines on how the site ensures: Weekly working hours do not exceed 60 hours; Workers receive one day off in every 7 or two in 14; Overtime is voluntary and not used to replace regular employment. Where policies exist, they are either outdated, vague, or contradicted in practice. In some cases, absence of documentation has contributed to overwork, missed rest days, or unmanaged excessive overtime. These shortcomings pose a systemic risk of non-compliance and prevent sustainable implementation of legal and SMETA-aligned working hour practices.

2. A designated person or team is assigned to oversee working hour compliance. The role is documented, and oversight generally functions well. However, in practice, coordination between departments is limited, and the responsible staff lack full training on how to assess and justify hours over 60 per week under the four ETI conditions (WR 6D).

Additionally, while records are collected, there is no structured system to evaluate rest days, voluntary overtime compliance, or manage overtime allocations proactively. Improving clarity of responsibilities and strengthening cross-functional cooperation would support better control and sustainability of working hour limits."

3. The site has not implemented any structured or documented communication or training for working hour compliance. Workers are largely unaware of their rights to refuse overtime or how many hours they are legally permitted to work. Supervisors and planners interviewed showed inconsistent or incorrect understanding of the site's maximum hour policies, rest day requirements, and the conditions for working beyond 60 hours. No evidence was found of a training schedule or refresher sessions on timekeeping practices or overtime policy. This absence of training increases the risk of involuntary overtime, missed rest breaks, and uninformed decisions by planners and supervisors.

4. The site lacks an effective monitoring system to track and control working hours. In several cases, working hour records were incomplete, inconsistent, or not retained in a way that allows verification of weekly totals, rest days, or break compliance. There was no evidence of routine internal checks against the 60-hour weekly limit, nor any system to flag violations or trends over time.

Additionally, there is no documented review of shift scheduling practices or overtime justification—particularly where recurring peak-season overwork has not been

[← Code area 5.A](#)

[Code area 7 →](#)

Management systems

preemptively planned or mitigated.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section

Current system :

1. Facility has established the working hours and overtime policy and signed by top management.
2. HR Manager is responsible for implementation of the code.
3. Working hours did not exceed the legal limits, and there was no collective bargaining agreements.
4. Legal working hour is 8 hours per day , 48 hours weekly and facility comply the same.
5. Legally one day off in every 7 days and one break in every 5 hour continues working, facility has provided one off on every Sunday and one break between the 5 Hour working .
6. As per policy overtime is voluntary.
7. No overtime performed in sample month however as per policy overtime premium paid 200% of the standard wages rate it is legal requirement.
8. The facility complies with all the legal requirements of this code area .
9. facility provides accurate and genuine records for verification.

11. Facility working hour

8 hours per day, 48 hours in a week. 1 weekly off on Sunday

Timings:

only one shift 9:00 am to 5:30 pm

Lunch: 12:45 pm to 13:15 pm

2 Tea break :- 11:00 am to 11:15 am & 3:15 pm to 3:30 pm

Weekly off - Sunday

Evidence Examined.

1. Facility Working hours and overtime Policy.
2. In/Out time records for 10 selected samples for 03 months i.e. july -2025, may - 2025, Sep - 2024 .
3. Production records (from work floors to check for discrepancies).
4. List of Holiday.
5. Shipment loading record.
6. Training record.
7. Workers interaction.

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?	NO overtime performed in sample month however as per policy and legal requirement overtime premium is 200% of standard wages rate.
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

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

Management systems

Explanation for management systems grades

1. The site does not have complete or documented policies and procedures to prevent discrimination across key areas of employment . The available documentation lacks detail on protected characteristics such as gender identity, union status, or political affiliation (WR 7.A–7.B).

Where policies exist, they are either outdated or do not cover processes such as preventing discriminatory health checks (WR 7.C) or ensuring equitable access to grievance mechanisms (WR 7.D). There is also no documented approach or action plan under WR 7.E for equity in hiring or promotion.

The lack of formal, inclusive, and implemented policies significantly limits the site's ability to identify, prevent, or correct discrimination, especially for vulnerable worker groups such as women, older workers, LGBTQ+ individuals, and non-direct hires."

2. A staff member has been appointed to oversee anti-discrimination and inclusion policies, and their role is referenced in internal procedures. However, the person does not have clear cross-functional authority or structured engagement with HR, hiring managers, or the grievance committee.

Although basic oversight exists, the site has not yet conducted an internal discrimination risk assessment, and no internal equity goals or metrics have been set. The lack of defined scope and regular reviews weakens the sustainability of implementation.

There is a foundation in place, but responsibilities and resourcing must be strengthened to ensure continuous and site-wide compliance."

3. There is no documented training plan or evidence of discrimination prevention training delivered to management, supervisors, or workers. Workers interviewed showed limited or no awareness of their rights related to equal treatment, non-discriminatory hiring practices, or how to report harassment.

There was also no evidence that grievance channels are clearly communicated or inclusive for diverse groups such as women, migrant workers, or those with limited literacy (WR 7.D). Communication on equity initiatives (WR 7.E) was also not available. The absence of consistent and inclusive communication undermines the ability of the workforce to identify and report discrimination."

4. The site does not actively monitor employment data to assess for risks or patterns of discrimination. No disaggregated data reviews are conducted , and there is no evidence of internal analysis of access to promotion, training, or termination outcomes.

Grievance data is not reviewed to detect systemic bias, and there is no assessment of the effectiveness of non-discrimination policies or grievance accessibility. There is also no tracking or evaluation of any existing equity-related actions (WR 7.E).

Management systems

The lack of structured monitoring makes it unlikely that the site can proactively prevent or correct discriminatory practices or build a sustainable equity culture.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section

Current System:-

1. Facility has established Non Discrimination Policy .
2. Manager HR is responsible for implementation of the code area.
3. No evidence discrimination is practiced, taking particular consideration of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union/work committee membership or political affiliation.
4. Facility employment policies and processes are sufficient to prevent discrimination at all stages of employment. This includes 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.
5. No any evidence evident regarding remuneration, all workers were paid above the local Govt categorized minimum wages and no discrimination evident in living wages.
6. No any evidence evident of the provision of religion, cast,.
7. No any medical test of pregnancy, HIV/aids required before hiring.
8. All workers have the accessible grievance mechanisms, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership and political affiliation.
9. Facility have equity approach in recruitment, training, development and promotion processes verified during the workers interview and management interaction.
10. No any human rights violation evident.

Evidence Examined.

1. Non-Discrimination Policy and procedure.
2. Appointment letter of 26 Sample employee.
3. Grievance record.
4. Training record.
5. Wages and benefit record.
6. Management and workers interaction.
7. Hiring advertisement.

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)?	
Representation of women in managerial roles (ratio of women workers to women managers)	16%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
--	-----------------------------------

Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
--	-----------------------------------

Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
---	-----------------------------------

Management systems

Explanation for management systems grades

"1. The site does not have adequate documented policies or procedures in place to ensure that employment contracts and models comply with legal and SMETA requirements. Employment agreements were either missing key terms, not signed by the workers, not issued in a language understood by workers, or not provided at all in some cases.

No documented procedures were available to govern the legal use of temporary, agency, or apprenticeship contracts. Additionally, there were no formal processes to ensure that termination, redundancy, or contract transitions are managed lawfully and transparently.

These deficiencies indicate that the current system is not capable of sustaining compliance with Workplace Requirements 8.A through 8.E."

"2. The site has assigned responsibility for employment matters to HR personnel; however, responsibilities related to monitoring employment models, contract transitions, or the use of third-party workers are not fully defined or integrated across departments.

The responsible staff have a basic understanding of legal obligations but have not received targeted training on contract structures, regularization processes, or legal thresholds for temporary and subcontracted labor. Strengthening the clarity and scope of assigned roles would enhance accountability and system effectiveness."

"3. There is no formal training program in place to educate workers, managers, or HR personnel on employment terms, dismissal rights, or regularization processes. Workers interviewed during the audit confirmed that they had not received a copy of their employment contract or were unaware of its contents. Some were unaware of their employment status .

Supervisors and planners were also unfamiliar with restrictions on repeated temporary contracts or legal limits on the use of irregular employment.

This lack of structured communication significantly weakens transparency and increases the risk of unintentional non-compliance."

"4. The site does not conduct regular or structured monitoring of employment status, contract validity, or compliance with legal requirements on worker classification.

There is no evidence of internal checks on:

- Contract completeness and accuracy;
- The duration or frequency of temporary/agency contracts;
- Whether workers are being transitioned to permanent status as required by law.

No internal audits were available to demonstrate that fair and lawful dismissal or redundancy procedures had been followed.

The absence of a monitoring system prevents the early detection or correction of

Management systems

employment-related risks and indicates a lack of sustainability in compliance practices."

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current System :-</p> <ol style="list-style-type: none"> 1. facility established the policy and procedure, which was signed by top management. 2. Manager HR is responsible for code implementation. 3. Facility has available and Provide a written contract that specifies the terms and conditions of employment, that meet all legal requirements, in a language workers can understand. 4. Written contract has included Job description, working hours, weekly off, overtime, wages, probation period, notice period, legal deduction, benefit, leave etc. copy signed by the workers. 5. Facility meet the contractual and legal obligations in cases of dismissal, termination or redundancy. 6. No nay apprenticed, temporarily , contractual, agency, Sub-contractor, freelance employee engaged in the facility. 7. All local laws were complied with in the facility for this code area. 8. Based on interaction with employees, no recruitment fee is required at any stage of the recruitment. 9. Photo identification card is issued to all the employees. 10. No migrant workers employed. <p>Evidence Examined:-</p> <ol style="list-style-type: none"> 1. Policy and procedures . 2. Appointment letter of 26 sampled employee. 3. Salary , wages and other benefit record. 4. Training record. 5. Interaction with workers and Management. 		

[← Code area 7](#)

[Code area 8.A →](#)

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	97.22%
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	2.78%
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	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	Fundamental Improvements Required

Management systems

Explanation for management systems grades

"1. The site has documented policies that generally address subcontracting and homeworking. These include a statement that subcontracting is not permitted without prior client approval (WR 8.A.A) and a clause covering the legal use of homeworkers (WR 8.A.C). However, the policies are not sufficiently detailed to support implementation or ongoing compliance.

For example, the site does not have written procedures for:

- How subcontractors or homeworkers are to be approved and monitored;
- Maintaining production records to demonstrate that all work is performed in-house;
- Verifying subcontractor compliance with legal and SMETA requirements.

While the intent is evident, the procedures require expansion and regular review to ensure they remain effective."

"2. A responsible person has been assigned oversight of subcontracting and homeworking-related matters, typically within the HR or compliance function. However, responsibilities are not clearly defined in writing, and there is no evidence of formal training specific to this area.

The current system relies on informal communication and ad hoc coordination with production teams. As a result, there is limited assurance that potential risks are being systematically identified and managed. Assigning clear responsibilities and strengthening cross-functional communication would support long-term compliance."

"3. The site communicates its policy on subcontracting and homeworking to senior staff, and there is awareness among production planners that client approval is required prior to outsourcing. However, this communication is limited in scope and not formally documented.

There is no structured training provided to supervisors, planners, or relevant departments on the risks associated with undocumented outsourcing or the need for compliance with WRs 8.A.B and 8.A.C. Workers are not informed about how subcontracting or homeworking arrangements, if used, should be managed or reported.

Strengthening training and internal messaging would support more consistent implementation of the site's stated policy."

"4. There is no system in place to monitor subcontracting activities or to verify that homeworkers, if used, work in conditions meeting the ETI Base Code (WR 8.A.C). No subcontractor register exists, and no evidence was provided of any historical site visits, assessments, or documentation audits relating to outsourced production. In addition, there is no evidence that the site monitors its production throughput in relation to its capacity, which raises concerns that production may be externally

Management systems

assigned without proper disclosure (WR 8.A.A).
The absence of any documented oversight, controls, or monitoring procedures creates a significant compliance gap that undermines transparency and due diligence."

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
-----------	-----------------------	------------	---------

No findings

Systems and evidence examined to validate this code section

Current System :-

1. Facility has established Sub-contractor policy and procedure.
2. Manager HR is responsible for code implementation.
3. Facility does not used Home workers and Sub-contracting.
4. No any process outsourced and facility have sufficient capacity for current demand.

Evidence Examined:-

1. Sub-contractor Policy and procedure.
2. Production record and planning record.
3. Production process flow chart.
4. List of Machinery.
5. Inward / Outward goods challan record.
6. Workers and management/security/supervisor interview.

[← Code area 8](#)

[Code area 9 →](#)

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
The facility has not bought any types of products that are used houseworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
No such evidence was found during the audit .

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used? No

[← Code area 8.A](#)

[Code area 9 →](#)

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

Management systems

Explanation for management systems grades

- "1. The site does not have a documented workplace policy that adequately prohibits harsh or inhumane treatment, including violence, harassment, or abuse as outlined in WRs 9A and 9B. The existing policy is either missing or fails to meet the required standard. It does not clearly define unacceptable behaviours such as verbal abuse, psychological harm, or gender-based violence. Additionally, there is no evidence that the site has conducted a risk assessment to identify and mitigate risks related to workplace violence or harassment, as required by WR 9D. No structured grievance procedure appears to be linked to this area, and workers indicated a lack of awareness of any internal process for reporting mistreatment. This absence of formalised and comprehensive procedures presents a high risk that harsh or inappropriate treatment could occur undetected or unaddressed."
- "2. A member of the HR team is generally responsible for overseeing workplace conduct and handling related grievances, but the role is not formally documented or clearly communicated to workers. The responsible individual has some awareness of the expectations under Code Area 9 but has not received specific training on managing harassment or violence-related cases. While issues may be addressed informally, the lack of a clearly defined and empowered role limits the effectiveness of implementation and accountability."
- "3. The site has not implemented an effective communication or training programme to ensure workers and supervisors are informed about their rights and responsibilities related to Code Area 9. Workers were generally unaware of any policies in place to address workplace violence, bullying, or harassment. No specific training had been conducted for those in supervisory or high-risk roles, such as security personnel or accommodation staff, despite these groups being identified in guidance as key to implementation. The lack of accessible communication and training creates a serious barrier to both prevention and resolution of potential issues."
- "4. There is no system in place to monitor the effectiveness of policies or practices related to harsh or inhumane treatment. The site has not conducted any internal assessments or reviews to evaluate whether risks are being managed or if workers feel safe. There are no records of disciplinary actions, and no formal review of grievances related to this area was made available during the audit. The absence of a monitoring process leaves the site without any mechanism to identify or respond to violations, and increases the risk of undetected harm, particularly for vulnerable workers."

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
-----------	-----------------------	------------	---------

No findings

Systems and evidence examined to validate this code section

Current System

1. Facility has established Anti harassment and abuse policy, and signed by top management.
2. HR manager responsible for implementation of the code requirements.
3. Facility not engage in harsh or inhumane treatment of workers, including gender-based violence and Psychological, Physical, verbal harassment.
4. Facility has communicate to all workers, including supervisors, Managers a workplace policy prohibiting harsh or inhumane treatment, including gender-based violence and Psychological, Physical, verbal harassment harassment.
5. Facility established fair and relevant disciplinary policy and procedure and communicate to all the employees.
6. Facility conducted risk assessment and has implement sufficient system to prevent the harassment and abuse,
7. Facility provided suggestion box, Grievance committee, Internal complaint committee in which involve the external member for transparent grievance handling.
8. Facility provided appropriate training for workers, including Managers, Supervisors, Administrative where risk has been identified.
9. All workers have accessible information and accessible training on the measures taken to prevent and control harsh or inhumane treatment, the identified risks and their rights and responsibilities.
10. Facility has not bodily searches, Where non-bodily searches are conducted the search must respect workers' privacy, be conducted by a member of the same sex and meet legal requirements.
11. Facility has formal process for workers to be able report grievances concerns, complaints, or problems without fear of retaliation. The grievance mechanism has legitimate, accessible, predictable, equitable, transparent, rights-compatible, continuously improving and based on engagement and dialogue.
12. Facility meet the ETI requirement of this code area.

Evidence Examined:-

1. Anti harassment and abuse policy.
2. Disciplinary policy and procedure.
3. Training record.
4. Management and workers Interaction.
5. Grievance Committee record.
6. Internal complaint committee Meeting record.
7. Suggestion / Complaint box record.

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	suggestion box and Grievance Committee .
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	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

[← Code area 9](#)

Management systems

Explanation for management systems grades

"1. The site does not have formal, documented policies or procedures in place to manage environmental impacts. There is no environmental policy that outlines the site's commitment to managing waste, water, emissions, or compliance with local environmental laws.

Procedures for identifying and mitigating environmental risks are either missing or extremely limited. The site was unable to provide evidence of structured processes for environmental record-keeping, pollution prevention, or waste disposal. The lack of documented systems makes it difficult to verify whether any environmental responsibilities are clearly understood or implemented.

This absence of foundational environmental procedures presents a serious risk of non-compliance with both legal obligations and SMETA requirements."

"2. There is currently no person formally assigned with responsibility for managing environmental compliance on site. During interviews, managers could not clearly articulate who holds operational responsibility for monitoring environmental aspects such as emissions, water use, or waste management.

There is no evidence of job descriptions, environmental responsibilities, or a reporting line for environmental issues. Without a responsible and accountable role, it is unlikely that any environmental practices, if present, are being implemented in a consistent or legally compliant manner."

"3. The site does not provide structured communication or training related to environmental policies or procedures. Employees, including those in operational roles, were not aware of any environmental practices or expectations.

No environmental training records were made available during the audit, and there was no evidence that staff had received any induction or refresher training related to environmental responsibilities. As a result, workers are unlikely to understand how their tasks might impact the environment or what good environmental practices they are expected to follow."

"4. There is no formal monitoring process in place to track environmental performance. The site does not keep records on water usage, waste volumes, emissions, or energy consumption.

No evidence of environmental inspections, internal audits, or compliance checks was provided. The absence of any monitoring framework means the site cannot identify environmental risks or ensure that its practices align with applicable legal or ethical standards.

This lack of monitoring seriously impairs the site's ability to manage its environmental responsibilities."

[← Code area 9](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law Base code	NC ZAF601115130
Systems and evidence examined to validate this code section	<p>Current System;-</p> <ol style="list-style-type: none"> 1. facility has established the environmental policy and procedure, addressed the operation process signed by top management. 2. HR manager is responsible for code implementation. 3. facility is aware of the local, regional, and national environmental laws relating to the site, and have clear processes around these laws , However , it has not obtained hazardous waste generation storage authorization permission from the consent authority. 4. facility is under the white category of the Pollution Control Board. 5. The facility has a system in place for identifying and remediating gaps between their clients' environmental standards and the environmental impact of their own operations. 6. The facility conducts internal audits to ensure they are compliant with the clients' requirements. <p>Evidence Examined :-</p> <ol style="list-style-type: none"> 1. Environmental Policy and Procedure. 2. Govt. notification/ declaration white category. 3. Internal audit record. 4. Environmental legal register. 		

[← Code area 9](#)

Findings: non-compliances

ZAF601115130

Non-compliance

Due 2025-10-27

Code area	Status
10.A Environment 2-Pillar	Closed (2025-11-01)*
Workplace requirement	Time given to resolve
10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.	30 days
Issue title	Verification method
598 - The site does not have all legally required permits for use and/or disposal of resources (e.g. energy, water, air emissions, waste etc.)	Desktop audit
Description	Area of non-compliance/non-conformance
During documents review and management interaction it was noted that facility has not obtained hazardous waste generation storage authorization permission from concerned authority.	Local law
	Base code
Corrective and preventative actions	
It is recommended facility to obtained hazardous waste generation, storage authorization permission from concerned authority.	
Local law reference	
According to the Hazardous Waste Management Rules of 2016, any entity generating, handling, storing, transporting, or disposing of hazardous waste in India needs to obtain an "authorization" or permission from the relevant State Pollution Control Board (SPCB) to legally manage such waste	

* PDF generated at 08:36 (UTC) on 01 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 10.A](#)

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?

no any environmental or energy management system evident.

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?

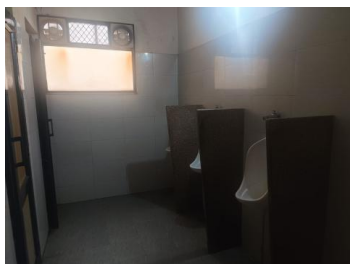
No

[← Code area 10.A](#)

Attachments



[Evacuation plan.jpeg](#)



[toilet.jpeg](#)



[Eye wash.jpeg](#)



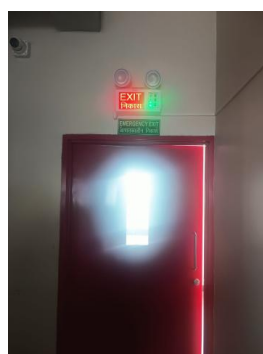
[attendnace machine.jpeg](#)



[rest room.jpeg](#)



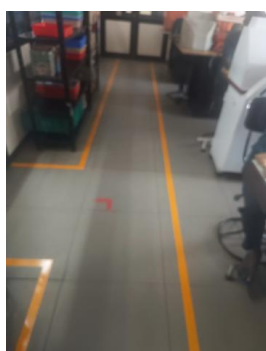
[Fire Alarm.jpeg](#)



[Emergency exit.jpeg](#)



[Emergency light.jpeg](#)



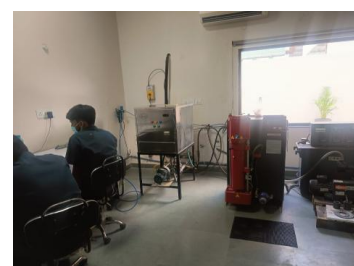
[Aisles marking.jpeg](#)



[emeregency light.jpeg](#)



[Electrical panel.jpeg](#)



[casting \(2\).jpeg](#)



[Production \(2\).jpeg](#)



[Production.jpeg](#)



[space storage for workers.jpeg](#)



[Fire hose reel and hydrant system.jpeg](#)



[Eleectro plating.jpeg](#)



[Air reciever.jpeg](#)



[Production \(3\).jpeg](#)



[checking.jpeg](#)



[Solding.jpeg](#)



[Suggetion box.jpeg](#)



[Casting.jpeg](#)



[fire hydrant pressur.jpeg](#)





[Storage.jpeg](#)



[Lunch area.jpeg](#)



[Fire hydrant Pump.jpeg](#)



[production \(4\).jpeg](#)



[Notice board.jpeg](#)



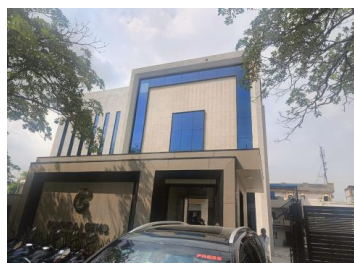
[RO plant.jpeg](#)



[Chemical room.jpeg](#)



[Fcatory gate.jpeg](#)



[Factory building.jpeg](#)



[Fire extinguisher.jpeg](#)



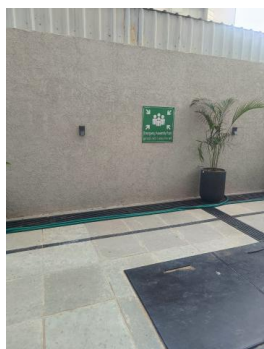
[DG set.jpeg](#)



[Fcatory name.jpeg](#)



[Front view.jpeg](#)



[Assembly area.jpeg](#)



[Nitrogen gas.jpeg](#)



[Signed CAPR.pdf](#)

