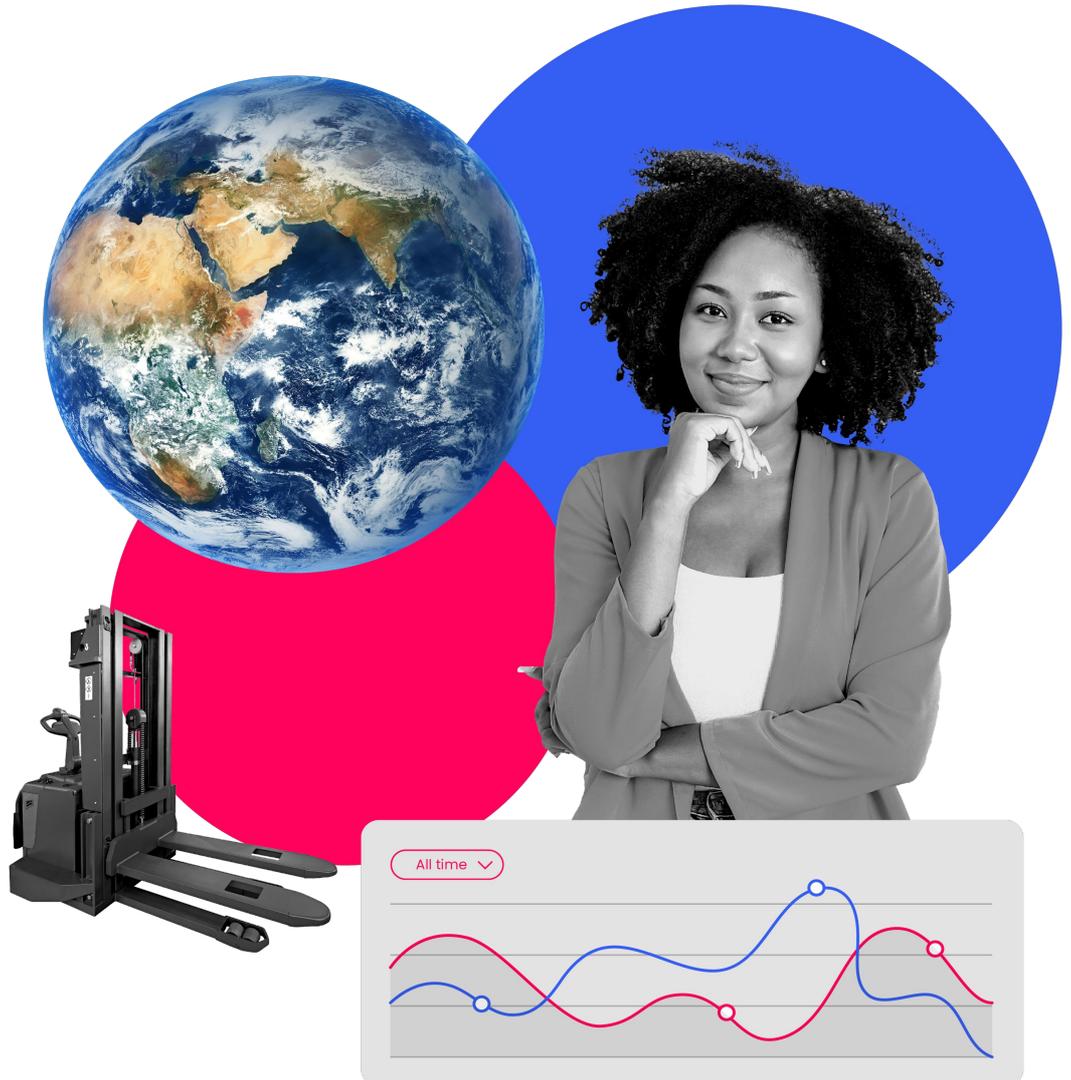


# Sedex Members Ethical Trade Audit Report

Version 7



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## Audit content

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

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

### Included in a 2-Pillar audit:

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

### Included in a 4-Pillar audit:

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

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

# Audit and site details

## Audit details

|                                |   |                             |                        |
|--------------------------------|---|-----------------------------|------------------------|
| <b>Sedex company reference</b> | ZC4956277   | <b>Auditor company name</b> | GSCS International Ltd |
| <b>Date of audit</b>           | 2024-11-12  | <b>Audit conducted by</b>   | Sedex member           |
| <b>Audit pillars</b>           | Labour Standards   Health and safety   Environment 4-Pillar   Business ethics |                             |                        |

## Site details

|                             |  |                     |   |
|-----------------------------|--|---------------------|---|
| <b>Sedex site reference</b> | ZS5106104                                      | <b>Site name</b>    | Platinum Apparels Manufacturing Company Limited |
| <b>Business name</b>        | PLATINUM APPAREL MANUFACTURING COMPANY LIMITED | <b>Site address</b> | 1341 Charabagh, Ashulia, Dhaka, BD              |
| <b>Site phone</b>           | +8801990034657                                 | <b>Site email</b>   | monjurul@pamcoba.com                            |

## Audit parameters

**Time in and out**

Day 1

In 09:10

Out 16:35

**Audit type**

Periodic

**Was the audit announced?**

Semi announced

**Was the Sedex SAQ available for review?**

Yes

**Who signed and agreed CAPR?**

Md. Sukur Ali / Manager- HR &amp; Compliance

**Any conflicting information SAQ/Pre-Audit Info**

No

**Is further information available?**

No

# Audit attendance

|  | Senior management   | Worker representative | Union representative |
|--|---|-----------------------|----------------------|
| <b>A: Present at the opening meeting?</b>        | Yes   | Yes                   | No                   |
| <b>B: Present at the audit?</b>                  | Yes   | Yes                   | No                   |
| <b>C: Present at the closing meeting?</b>        | Yes   | Yes                   | No                   |
| <b>Reason for absence at the opening meeting</b> | There was no union present in the facility. Facility has formed a workers participation committee and as per local law if facility forms a workers participation committee then union is not mandatory for them. However, senior management and worker representative was present in the opening meeting. |                       |                      |
| <b>Reason for absence during the audit</b>       | There was no union present in the facility. Facility has formed a workers participation committee and as per local law if facility forms a workers participation committee then union is not mandatory for them. However, senior management and worker representative was present during audit.           |                       |                      |
| <b>Reason for absence at the closing meeting</b> | There was no union present in the facility. Facility has formed a workers participation committee and as per local law if facility forms a workers participation committee then union is not mandatory for them. However, senior management and worker representative was present in the closing meeting. |                       |                      |

# SMETA declaration

## Auditor team

|   |   |                     |          |
|---|---|---------------------|----------|
| <b>SMETA declaration</b>  | <p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> <li>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.</li> <li>Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.</li> </ol> <p>This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.</p> |                     |          |
| <b>Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)</b> | None  |                     |          |
| <b>Lead auditor</b>   | Akil Mahmud   | <b>APSCA Number</b> | 32200701 |
| <b>Additional auditor</b>   | Md. Tanvir Hasan Khan   | <b>APSCA Number</b> | 32200442 |
|   | Md. Mostafizur Rahman   | <b>APSCA Number</b> | 32200934 |
|   | Md. Shamim Hossain  | <b>APSCA Number</b> | 32400342 |
| <b>Date of declaration</b>  | 2024-11-12  |                     |          |

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## Site representation

|                            |  |
|----------------------------|--|
| <b>Declaration</b>         | 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. |
| <b>Full name</b>           | Md. Sukur Ali  |
| <b>Title</b>               | Manager- HR & Compliance   |
| <b>Date of declaration</b> | 2024-11-12   |

## Summary of findings

| Code area  | Workplace requirement                            | Local law | Finding                         |
|--|--|-----------|---------------------------------|
| <b>3. Working conditions are safe and hygienic</b> | 3.N Maintain a log of all hazardous substance... | §1        | NC <a href="#">ZAF600692470</a> |
|  | 3.O Implement an appropriate electrical safet... | §2        | NC <a href="#">ZAF600692471</a> |
|  | 3.A Ensure a safe working environment. Put in... | §3        | NC <a href="#">ZAF600692472</a> |
|  | 3.H Where identified as necessary to reduce r... | §4        | NC <a href="#">ZAF600692474</a> |
|  | 3.O Implement an appropriate electrical safet... | §5        | NC <a href="#">ZAF600718310</a> |
|  | 3.L Implement effective processes to manage f... | §6        | NC <a href="#">ZAF600718311</a> |
| <b>10.B. Environment 4-Pillar</b>                  | 10.B.H Record energy use, water use, solid wa... | §7        | NC <a href="#">ZAF600692473</a> |
| <b>5. Legal wages are paid</b>                     | 5.H Comply with all other applicable laws tha... |           | GE <a href="#">ZAF600718312</a> |

## Local law issues

|    |   |
|----|---|
| §1 | "The Bangladesh Labour Act, 2006, Section 79 (a & e): Where the Government is satisfied that any operation carried on in an establishment exposes any person employed in it to a serious risk of bodily injury, poisoning or disease, it may, by rules, make the following provisions for such establishment, namely: (a) to declare which operations are hazardous; (e) to give notice of any corrosive chemicals and of precautions to be taken in their use"   |
| §2 | Bangladesh National Building Code, 2020, Part 3, 1.22: Lightning protection measures shall be installed on all buildings whose exposure conditions indicate the likelihood of lightning strike and consequential hazard to life and property. Buildings housing explosives or detonators, buildings where a large number of people live or congregate and those that are of strategic or defense importance shall always be protected against lightning strikes. The requirement of lightning protection systems shall be assessed and they shall be designed and installed in accordance with the provisions of Chapter 2 of Part 8.   |
| §3 | "In accordance with The Bangladesh Labour Act 2006, Chapter-8, Section-94 (2): Such rooms shall provide adequate accommodation, adequately lighted and ventilated and maintained in a clean and sanitary condition and shall be under the charge of woman trained or experienced in the care of children and infants. In accordance with The Bangladesh Labor Rules 2015, Chapter-8, Section-94: 1) The layout, quality and position of the Children's Room or the separate Children Building or the adapted building must be approved by the Inspector General or the Inspector authorized by him/her. 2) A separate and screen covered area must be kept preserved for the breastfeeding mothers so that they can lactate their babies maintaining secrecy and modesty. 3) The floor of the Children's Room and the internal walls thereof with a height of 1.22 meters must be made smooth and impervious. 4) 0.25 liters of milk for each child and nutritious foods must be supplied for the children staying in Children's Room. Bangladesh Gazette, Extra, September 15, 2015 7375 5) Neat and clean clothes must be provided for the employees working in Children's Room. 6) Females must be prioritized while recruiting employees for the Children's Room. " |
| §4 | In accordance with The Bangladesh Labour Rules, 2015, Rule 67 (2 & 3): 2) In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. 3) No worker can be employed in the relevant works without ensuring safety and health protection measures and the training related therewith. In addition, personal safety equipment must be preserved in accordance with Information Form-23.  |
| §5 | In accordance with The Bangladesh Labour Rules, 2015, Rule 58 (7): (7) All of the electric wiring and switch boards have to be complete by the non-passing elements through 'conceal wiring'.   |
| §6 | "In accordance with The Bangladesh Labor Act 2006, Chapter- 6, Section – 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.<br>In accordance with Bangladesh Labor Law 2006, Section 72 (c): 2 passages and stairways shall be clean, wide and clear of all obstructions 3 [;] and 4 [(d) an employer may, for overall safety of the factory and workers, bring the passages of movements, stairs, gates, godowns and common utility area of the place of work under close circuit camera."  |
| §7 | In accordance with The Bangladesh labour Laws, 2006, section 54: Effective arrangements shall be taken in every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.   |

# Management systems

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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

# Site details

## Company and site details

|   |  |  |
|---|--|--|
| Sedex company reference   | ZC4956277  |  |
| Sedex site reference  | ZS5106104  |  |
| Company name  | PLATINUM APPAREL MANUFACTURING COMPANY LIMITED   |  |
| Business ownership type   | GOODS  |  |
| Site name   | Platinum Apparels Manufacturing Company Limited  |  |
| Site name in local language   | :::  |  |
| GPS location  | GPS address  | Charabagh, Ashulia, Dhaka 1341, Bangladesh                 |
|   | Coordinates  | Latitude: 23.887378625663366, Longitude: 90.30541398568576 |
| Is the worksite in a remote location, far from habitation?                            | No   |  |
| Site contact  | Contact name   | Md. Sukur Ali  |
|   | Job title  | Manager (HR & Compliance)                                  |
|   | Phone number   | +8801990034657   |
|   | Email  | hradmin@pamcobd.com  |
| Applicable business and other legally required business license numbers and documents | Factory License No. 17966/Dhaka, issued by Bangladesh Government which valid till on June 30th, 2025. Trade License No. 002194 is issued by 05 No. Ashulia Union Council which is valid till June 30th, 2025. Fire License No. DD/DHAKA/25608/2015, issued by Bangladesh Fire Service & Civil Defence authority which is valid till June 30th 2025. Certificate of Incorporation No. C-105626/12, with lifetime validity started from November 18th, 2012. |  |

## Site activities

|               |                                 |
|---------------|---------------------------------|
| Site function | Factory Processing/Manufacturer |
|---------------|---------------------------------|

## Site activities

|  |  |
|--|--|
| <b>Site activities</b>   | <p><b>Primary</b> Cutting, shaping and finishing of stone</p> <p><b>Secondary</b></p> <p><b>Other</b></p>  |
| <b>Product type</b>  | The factory specialized in manufacturing of all kinds of woven garments. The main production process is Cutting, Sewing, Finishing & Packing.  |
| <b>Process overview</b>  | <p>The factory specialized in manufacturing of all kinds of woven garments. The main production process is Cutting, Sewing, Finishing &amp; Packing. The facility production capacity 2,30,000 Pcs Per month.</p> <p>Main Equipment Used : Single Needle machine 300 Pcs, two Needle machine 14 pcs, Overlock machine 45 Pcs, Kansai Machine 10 Pcs, Flatlock machine 9 Pcs, chain Stitch 8 pcs, Snap Button machine 7 Pcs, Button Hole Machine 19 Pcs, Button Stitch 16 Pcs, Feed of the arm 16 Pcs, bartack Machine 7 Pcs etc.</p> |
| <b>What level of mechanization best describes the work at this site?</b> | Fair mechanisation / manual Labour   |

## Site scope

|  |  |
|--|--|
| <b>Is the audited site a physically continuous area?</b> | Yes  |
| <b>What is the area of audited site to its boundary?</b> | 5320m <sup>2</sup>   |
| <b>Building 1</b>  | <p><b>Last construction works on site</b> 2016</p> <p><b>If building is shared, provide details</b> N/A</p> <p><b>Number of floors</b> 4</p> <p><b>Description of floor activities</b> Building 1 : Ground Floor : Office, Sample , HR room, Store , Fabric Inspection, Medical, child care, dining; 1st Floor : Sewing Section, Inspection room, Finishing Section, Needle room, Finish goods Area; 2nd floor : Sewing section, maintenance room, Inspection room, Finishing section, Finish Goods Area. 4th Floor : Cutting Section, CAD Room, Spot Removing room.</p> |

## Site scope

|  |  |   |
|--|--|---|
| Building 2   | Last construction works on site        | 2016  |
|  | If building is shared, provide details | N/A   |
|  | Number of floors                       | 1   |
|  | Description of floor activities        | Building 2 : Ground Floor : Security Room.            |
| Building 3   | Last construction works on site        | 2016  |
|  | If building is shared, provide details | N/A   |
|  | Number of floors                       | 1   |
|  | Description of floor activities        | Building 3 : Ground floor : Sub Station, Boiler room. |
| Building 4   | Last construction works on site        | 2016  |
|  | If building is shared, provide details | N/A   |
|  | Number of floors                       | 1   |
|  | Description of floor activities        | Building 4 : Ground Floor : Wastage room.             |
| Building 5   | Last construction works on site        | 2016  |
|  | If building is shared, provide details | N/A   |
|  | Number of floors                       | 1   |
|  | Description of floor activities        | Shed 1 : Ground floor : Generator room.               |
| Building 6   | Last construction works on site        | 2016  |
|  | If building is shared, provide details | N/A   |
|  | Number of floors                       | 1   |
|  | Description of floor activities        | Shed 2 : Ground floor : canteen.                      |
| 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                                     |   |

## Site scope

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

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not applicable  
Not applicable as the facility doesn't provide transport to the workers and it is not required by local law.

## Work patterns

|   |           |         |          |         |
|---|-----------|---------|----------|---------|
| Approximate workers on site per month (% of peak) | January   | 95-100% | February | 95-100% |
|   | March     | 95-100% | April    | 95-100% |
|   | May       | 95-100% | June     | 95-100% |
|   | July      | 95-100% | August   | 95-100% |
|   | September | 95-100% | October  | 95-100% |
|   | November  | 95-100% | December | 95-100% |

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

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? Other social audit  
Facility had conducted BSCI audit. Audit rating was B and it is valid till 13.12.2025.

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 site did not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community

## Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?

No

There has been no Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.

# Worker analysis

Gender disaggregated data available      Men and women

## Worker totals

|                   | Men       | Women     | Other | Total      |
|-------------------|-----------|-----------|-------|------------|
| Number of workers | 307 (40%) | 461 (60%) | - -   | 768 (100%) |

## Workers by type

|   | Men       | Women     | Other | Total      |
|---|-----------|-----------|-------|------------|
| Permanent workers (employees)           | 307 (40%) | 461 (60%) | - -   | 768 (100%) |
| Temporary or fixed term employees       | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Agency or subcontracted workers         | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Seasonal workers                        | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Self-employed workers                   | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Informal workers including home workers | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Apprentices, trainees or interns        | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |

\* % of total workforce

## Migrant workers

|                               | Men           | Women         | Other      | Total         |
|-------------------------------|---------------|---------------|------------|---------------|
| Domestic migrant workers      | 0 (0%)        | 0 (0%)        | - -        | 0 (0%)        |
| International migrant workers | 0 (0%)        | 0 (0%)        | - -        | 0 (0%)        |
| <b>Total migrant workers</b>  | <b>0 (0%)</b> | <b>0 (0%)</b> | <b>- -</b> | <b>0 (0%)</b> |

\* % of total workforce

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

Not applicable as no migrant worker was found.

## Workers by age

|                    | Men         | Women       | Other | Total       |
|--------------------|-------------|-------------|-------|-------------|
| 18 - 24 years old  | 160 (20.8%) | 180 (23.4%) | - -   | 340 (44.3%) |
| 15 - 17 years old  | 0 (0%)      | 0 (0%)      | - -   | 0 (0%)      |
| Under 15 years old | 0 (0%)      | 0 (0%)      | - -   | 0 (0%)      |

\* % of total workforce

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

Describe how this may vary during peak periods Not applicable as the facility doesn't have any peak season.

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

### Most common nationalities as approximate % of workforce

|             | Men | Women | Other | Total |
|-------------|-----|-------|-------|-------|
| Bangladeshi | 40% | 60%   | -     | 100%  |

## Workers by remuneration type

|   | Men       | Women     | Other | Total      |
|---|-----------|-----------|-------|------------|
| Workers paid per unit (piece rate)                          | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Workers paid based on a mix of 'piece work' and hourly rate | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Workers paid hourly / daily rate                            | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Salaried workers  | 307 (40%) | 461 (60%) | - -   | 768 (100%) |

\* % of total workforce

## Workers by payment cycle

|              | Men       | Women     | Other | Total      |
|--------------|-----------|-----------|-------|------------|
| Paid daily   | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Paid weekly  | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |
| Paid monthly | 307 (40%) | 461 (60%) | - -   | 768 (100%) |
| Other        | 0 (0%)    | 0 (0%)    | - -   | 0 (0%)     |

\* % of total workforce

If other payment cycle entered, please provide details

No other payment cycle was found.

## People in managerial, supervisory and administrative roles

|                                   | Men       | Women    | Other | Total |
|-----------------------------------|-----------|----------|-------|-------|
| Employees in management positions | 15 (2%)   | 0 (0%)   | - -   | 15    |
| Supervisors or team leaders       | 20 (2.6%) | 1 (0.1%) | - -   | 21    |
| Administrative staff              | 3 (0.4%)  | 3 (0.4%) | - -   | 6     |

# 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      30 (06 groups of 05 workers)

Did workers understand the purpose of the audit?      Yes

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

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

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

## Attitude of workers

|   |   |
|---|---|
| <b>In which areas did workers raise significant concerns or complaints?</b> | Other (provide details)<br>No concerns were raised.   |
| <b>What did the workers like the most about working at this site?</b>       | Facilities (e.g. rest area, recreation, canteen)<br>Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.)<br>Pay<br>Job security<br>Workplace benefits (e.g. child care provisions)<br>Communication (e.g. from management)<br>Training and development<br>Hours worked, rest days or breaks<br>Work atmosphere (e.g. treatment by supervisors)<br>Social dialogue (e.g. freedom to associate)<br>Equal opportunities<br>Grievance mechanisms<br>Overtime<br>Work environment – comfort (e.g. temperature, noise or dust levels)<br>Freedom of movement |
| <b>Additional comments</b>  | Nothing to report.  |
| <b>Attitude of workers' committee/union representatives</b>                 | During Interview, the worker committee representatives expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary.   |
| <b>Attitude of managers</b>   | The management was found to be well versed with the requirements of social audit, management was very co-operative and transparent during the course of the audit. They were receptive towards findings. The management approach was found very positive.   |

## Workers interviewed by type

|                                   | <b>Total</b> |
|-----------------------------------|--------------|
| Permanent workers                 | 42           |
| Temporary or fixed-term employees | 0            |
| Agency or subcontracted workers   | 0            |
| Seasonal workers                  | 0            |
| Other workers                     | 0            |

## Workers interviewed by type

|                                     |    |
|-------------------------------------|----|
| Total number of workers interviewed | 42 |
|-------------------------------------|----|

## Workers interviewed by group/individual

|                                  | Men | Women | Other | Total |
|----------------------------------|-----|-------|-------|-------|
| Workers interviewed in groups    | 12  | 18    | -     | 30    |
| Workers interviewed individually | 5   | 7     | -     | 12    |

## 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)        | 5.9%  | 4.04% | -     | 4.8%  |
| Last full calendar year (2023)     | 2.6%  | 1.5%  | -     | 1.95% |
| Previous full calendar year (2022) | 3.58% | 1.95% | -     | 2.6%  |

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

## Rate of absenteeism (%)\*

|                                    | Men   | Women | Other | Total |
|------------------------------------|-------|-------|-------|-------|
| Last full quarter (90 days)        | 0.97% | 0.65% | -     | 0.78% |
| Last full calendar year (2023)     | 2.14% | 1.55% | -     | 1.78% |
| Previous full calendar year (2022) | 2.69% | 1.81% | -     | 2.14% |

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

Are accidents recorded?      Yes

Facility doctor and nurse maintains the record for all types of injury and accident.

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

|  | Men | Women | Other | Total |
|--|-----|-------|-------|-------|
|  |     |       |       |       |

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

|                                    |       |       |   |       |
|------------------------------------|-------|-------|---|-------|
| Last full quarter (90 days)        | 0.65% | 0.43% | - | 0.52% |
| Last full calendar year (2023)     | 1.78% | 1.11% | - | 1.36% |
| Previous full calendar year (2022) | 2.69% | 1.81% | - | 2.14% |

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

### Lost day work cases (per 100 workers)\*

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

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

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

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

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

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

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

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

# 0. Enabling accurate assessment

## Summary of findings

| Code area  | Workplace requirement  | Local law | Finding |
|--|--|-----------|---------|
| No findings  |  |           |         |
| <b>Systems and evidence examined to validate this code section</b> | <ul style="list-style-type: none"> <li>- The facility ensures auditors have unrestricted access to all necessary documents, interviewees, and areas, including outbuildings and accommodations. Historical records confirm that no obstructions have been reported.</li> <li>- The facility has robust anti-bribery policies in place, prohibiting any form of bribery or threats towards auditors. All personnel are trained on these policies to ensure ethical interactions with auditors.</li> <li>- The facility maintains an accurate site description and Sedex site profile, which are regularly updated. These documents are verified against actual site conditions to ensure consistency.</li> <li>- A comprehensive human rights policy statement, approved by senior management, is actively communicated and trained to all relevant personnel. Implementation of this policy is regularly reviewed for effectiveness.</li> </ul> <p>Evidence Examined :</p> <ul style="list-style-type: none"> <li>-Human rights policy</li> <li>-Management Interview</li> <li>-Documents Review etc.</li> <li>-Workers Interview</li> </ul> |           |         |

0. Enabling accurate assessment

## Data points

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

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

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

# 1. Employment is freely chosen

## Management systems

|  |                           |
|--|---------------------------|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems |

## Management systems

### Explanation for management systems grades

#### Clear Rules About Voluntary Employment:

The factory has clear rules that say all workers must choose to work freely. These rules are shared with everyone—workers, supervisors, and hiring agencies—so everyone understands that no one should be forced to work through threats or pressure.

#### Workers Keep Their Personal Documents:

The factory does not keep workers' passports, ID cards, or any personal documents. Workers can keep their documents with them. If they want to store them safely, the factory provides a secure place, and workers can access their items whenever they want. This prevents the factory from controlling workers through their documents.

#### Freedom to Leave the Job:

Workers can leave their job if they give reasonable notice, as stated in their contract or by law. There are no fees or penalties for leaving, and workers get all the pay and benefits they are owed. This ensures that workers are not stuck in their jobs because of unfair rules.

#### Regular Training and Awareness:

The factory provides regular training to both workers and managers about workers' rights to choose their employment freely. This training covers the factory's rules against forced labor and explains workers' rights to leave their jobs. New workers learn about these rights when they start, and training is repeated regularly. Last ETI base Code training conducted on 07.10.2024 where this code area was included in the training.

#### Fair Hiring Practices:

The factory makes sure that hiring is done fairly. Workers do not have to pay fees to get a job. If the factory uses outside hiring agencies, it checks to make sure these agencies follow fair practices and do not force people to work or engage in trafficking.

#### Clear Employment Contracts:

All workers get a written contract in a language they understand. The contract clearly states job terms like pay, work hours, job duties, and how to leave the job. This helps workers understand their rights and prevents any hidden terms that could trap them in their jobs.

#### Easy Way to Report Problems:

The factory has a simple and confidential way for workers to report any issues, like feeling forced to work or facing unfair treatment. Dedicated staff handle these complaints quickly and fairly, ensuring that workers are safe from any backlash.

#### Regular Checks and Audits:

The factory regularly checks its own practices and brings in outside auditors to make sure they are following the rules on "Employment is Freely Chosen." They look at hiring practices, contracts, and worker feedback to ensure no forced labor happens. Any problems found are fixed right away.

#### Continuous Improvement:

The factory constantly reviews and updates its policies based on feedback from workers, audits, and changes in laws or standards. This helps keep the system effective, fair, and up-to-date to protect workers' rights. Last internal audit conducted on 25.06.2024. Facility nominated Md. Sukur Ali-Manager (HR & Compliance) is responsible for monitoring this Code & related issues.

## Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|-----------|-----------------------|-----------|---------|
|-----------|-----------------------|-----------|---------|

No findings

**Systems and evidence examined to validate this code section**

- The facility has established a clear policy against forced labour, human trafficking, and debt bondage. Audits and compliance checks confirm that these practices are not present.
- The facility's code of conduct strictly prohibits any form of coercion, threats, or inhumane treatment. Records and employee feedback support the effective enforcement of these standards.
- Workers are allowed to freely leave the workplace and living areas, with reasonable restrictions only for safety reasons. It was confirmed that this policy is actively followed which was verified by in/out register and workers and security guard interview.
- Surveillance practices are regulated to avoid excessive monitoring or intimidation. The use of CCTV and other surveillance methods is justified and aligns with privacy standards.
- Workers are free to communicate and interact both inside and outside the workplace. There are no restrictions on social interaction or intentional isolation.
- The facility's policy of not retaining workers' original passports or identity documents is a commendable practice that aligns with international labor standards and the facility does not retain workers' original passports or identity documents. During recruitment management takes a photocopy of NID and birth certificate as evidence. Facility provides personal locked to every individual workers. Workers usually use it for their lunch and sandals.
- Workers can resign without incurring any fees and receive all due wages and benefits. Policies ensure compliance with legal requirements, and records confirm proper handling of resignations. Workers can resign any time after a notice period of 60 days as per local requirement. Also workers paid all the entitled benefits as per requirement.
- Workers are paid according to a regular schedule that meets legal requirements. Payroll records show that payments are timely and in line with applicable laws which is within 7 days of the following months. Last month (October, 2024) salary was paid on 7th November, 2024.
- The facility ensures fair compensation and does not place workers in debt. Loan scheme is not established yet also there is no evidence of wage or others benefits retention. Verified by documentation review and workers interview.
- The facility does not require workers to post deposits or bonds. Relevant policies and payroll records confirm that no such financial burdens are imposed.
- Payments are not withheld or used for forced savings. Payroll records indicate that workers receive their earnings in full and on time verified by reviewing payroll records, worker and management interview.
- The facility ensures that workers receive at least the legal minimum wage and complies with laws regarding working hours and overtime. A new Gezette for garments workers in introduced in December 2023 and facility implemented the Gezette immediately. If necessary management assigned workers for max 2 hours of overtime with their consent. Also facility provides 1 day off which is Friday. Compliance is verified through payroll and legal reports.
- The facility had a policy which strictly prohibits any kind of force labor and all the other stakeholders are in line with this practice. Records of audits and assessments confirm adherence to these practices.
- Facility did not use any prison labor.
- The facility adheres to all relevant laws concerning the specified Code Area. Documentation and audit reports confirm full compliance with legal requirements.

Evidence Examined :  
1. Personnel files

2. Factory policy, rules and regulations, and training records etc.
  3. Resignation records
  4. Factory rules
  5. Employee handbook
  6. Management and worker interview
-

1. Employment is freely chosen

## Data points

---

|  |                |
|--|----------------|
| If required under local law, is there a published 'modern slavery' or similar statement? | Not Applicable |
|--|----------------|

---

|  |    |
|--|----|
| Does the site utilise any workers who are prisoners? | No |
|--|----|

---

|   |    |
|---|----|
| Does the site use the labour of persons required to work under any government scheme? | No |
|---|----|

# 1.A. Responsible recruitment and entitlement to work

## Management systems

|  |                           |
|--|---------------------------|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems |

## Management systems

### Explanation for management systems grades

#### Clear Hiring Policies:

The factory has clear rules for hiring workers. These rules make sure that all hiring is done fairly and without discrimination. They also ensure that workers are not charged any fees to get a job. All workers are hired directly or through approved agencies that follow these rules.

#### Checking Workers' Right to Work:

Before hiring, the factory checks that all workers have the legal right to work. This includes verifying documents like work permits, visas, or identity cards. These checks are done carefully to ensure no one is hired illegally, which protects both the worker and the factory.

#### Written Contracts in a Language Workers Understand:

Every worker gets a clear, written contract in a language they understand. The contract explains the job role, pay, working hours, benefits, and terms of employment. This helps workers know what to expect and ensures there are no surprises.

#### No Recruitment Fees or Hidden Costs:

Workers do not have to pay any fees to get a job at the factory. This includes fees for travel, visas, or medical checks. If recruitment agencies are used, the factory makes sure they also do not charge workers any fees. This prevents workers from going into debt or feeling trapped in their jobs.

#### Fair Treatment During Hiring Process:

The factory ensures that all workers are treated fairly during the hiring process. There is no discrimination based on race, gender, religion, or any other factor. Everyone is given equal opportunity and treated with respect.

#### Training for Recruitment Staff:

The factory provides regular training for all staff involved in hiring. This training covers responsible recruitment practices, workers' rights, and the importance of checking legal documents. It helps ensure that all recruitment is done ethically and legally. Last ETI base Code training conducted on 07.10.2024 where this code area was included in the training.

#### Monitoring Recruitment Agencies:

If the factory uses outside recruitment agencies, it carefully checks them to make sure they follow ethical recruitment practices. The factory regularly reviews these agencies to ensure they do not engage in illegal practices like human trafficking or charging fees to workers.

#### Easy Way for Workers to Report Problems:

The factory has a simple, confidential system for workers to report any issues with recruitment or unfair treatment. If workers feel they were misled, charged fees, or not given the job conditions they were promised, they can report it without fear of punishment.

#### Regular Audits and Checks:

The factory conducts regular internal and external audits to check that all recruitment practices are fair, legal, and transparent. These audits help identify any issues or areas for improvement, ensuring the factory continues to follow responsible recruitment practices.

#### Continuous Improvement:

## Management systems

The factory constantly updates its recruitment policies and practices based on worker feedback, audit findings, and changes in laws or industry standards. This ensures the system stays effective, fair, and in line with best practices. Last internal audit conducted on 25.06.2024. Facility nominated Md. Sukur Ali-Manager (HR & Compliance) is responsible for monitoring this Code & related issues.

## Summary of findings

| Code area   | Workplace requirement  | Local law | Finding |
|---|--|-----------|---------|
|   | No findings  |           |         |
| Systems and evidence examined to validate this code section | <p>-As Per document review, factory management representation, and workers' interview, it was observed that all workers in the factory were Bangladeshi and 100% were local workers and no permission is required for working from one district to another district. During recruitment management check birth certificate to validate information.</p> <p>- At the start of the employment facility provided a copy of appointment letter is provided to the worker which includes the job description, working hour , pay scale and others relevant information.</p> <p>- Facility established a policy regarding child labor which prohibits workers under the age of 14. As per local law facility can recruit workers above 14 years as young worker however, no such worker was found during audit and the youngest worker age was 18 years old.</p> <p>- All of them were recruited directly by the factory and no agency was involved in the factory's recruitment processes.</p> <p>- No agency staff or foreign worker was used by the factory. Facility provides all recruitment fees for the worker.</p> <p>- There were not any deductions for items such as travel and equipment.</p> <p>-Facility does not have any sub-contractor worker.</p> <p>- Facility policy reflects that they will not recruit any child labor or young worker.</p> <p>- Facility has an anti-corruption and bribery policy where it reflects that all recruitment will be done fairly.</p> <p>- Facility doesn't have any agency workers.</p> <p>Evidence examined:</p> <ol style="list-style-type: none"> <li>1. Hiring procedure</li> <li>2. Personnel files</li> <li>3. Worker's handbook</li> <li>4. Worker's interview</li> <li>5. Management interview</li> </ol> |           |         |

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

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

#### Migrant workers

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

#### Recruitment fees

**Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?**

No

No recruitment fees were identified during audit.

---

**Were recruitment fees or costs identified during worker interviews?**

No

No recruitment fees were identified during audit.

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

### Management systems

|  |                           |
|--|---------------------------|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met | Robust Management Systems |
|--|---------------------------|

|  |                           |
|--|---------------------------|
| Appoint a manager with sufficient seniority who is responsible for implementing procedures | Robust Management Systems |
|--|---------------------------|

|  |                           |
|--|---------------------------|
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
|--|---------------------------|

|   |                           |
|---|---------------------------|
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |
|---|---------------------------|

## Management systems

### Explanation for management systems grades

#### Clear Policy Supporting Freedom of Association:

The factory has a clear, written policy that supports workers' rights to join or form trade unions or worker groups without fear of punishment. This policy is shared with all workers, supervisors, and managers so that everyone knows workers are free to organize.

#### Respect for Workers' Rights to Organize and Bargain Collectively:

The factory respects workers' rights to form or join unions and to collectively bargain for better wages, benefits, and working conditions. There are no barriers or restrictions put in place to stop workers from coming together to discuss their rights.

#### No Discrimination or Retaliation:

The factory does not discriminate against workers who join a union or worker group or who participate in collective bargaining. There is a strict rule against punishing or firing workers for being involved in these activities. Any reports of retaliation are taken seriously and investigated immediately.

#### Regular Training for Managers and Supervisors:

The factory provides regular training to all managers and supervisors about the rights of workers to associate freely and bargain collectively. This training helps ensure that management knows how to support these rights and handle related matters fairly and respectfully. Last Freedom of Association & collective agreement training conducted on 10.10.2024.

#### Open Communication Channels:

The factory encourages open communication between workers and management. There are regular meetings where workers can bring up their concerns and discuss workplace issues. This helps build trust and ensures that workers feel heard and valued.

#### Support for Worker Representatives:

Worker representatives are allowed to carry out their duties, such as organizing meetings and speaking with workers, without interference. They are given the time and resources they need to represent their colleagues effectively.

#### Easy Way for Workers to Report Issues:

There is a simple and confidential process for workers to report any problems or concerns about their rights to organize or bargain collectively. Workers can raise issues without fear of retaliation, and the factory investigates and resolves these concerns quickly.

#### Regular Review and Audits:

The factory regularly reviews its policies and practices to make sure they are up-to-date and in line with laws and best practices on freedom of association and collective bargaining. Independent audits are also conducted to check compliance and identify areas for improvement.

#### Support for Collective Bargaining Agreements:

When workers form a union or worker group and negotiate a collective bargaining agreement, the factory respects and follows the agreement. This includes honoring terms related to wages, hours, benefits, and working conditions.

#### Continuous Improvement:

## Management systems

The factory continuously improves its management system based on worker feedback, audit results, and changes in labor laws. This ensures that the system remains effective and supportive of workers' rights to freedom of association and collective bargaining. Last internal audit conducted on 25.06.2024. Facility nominated Md. Sukur Ali-Manager (HR & Compliance) is responsible for monitoring this Code & related issues.

## Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|-----------|-----------------------|-----------|---------|
|-----------|-----------------------|-----------|---------|

No findings

### Systems and evidence examined to validate this code section

-All the employees can form or join the trade union of their choice. They are well aware about the legal requirement regarding trade union and collective bargaining agreement.

-There is no trade union in the facility but there is a Participation Committee.

-Participation Committee was formed by election on 23 November 2022.

-Last Participation Committee meeting is held once in two months. Last meeting was held on 13 October, 2024.

-Meeting minutes are posted in notice board and recorded in a register.

-There are 6 members from worker side and 6 from management side , Total 12 members are in the Participation Committee.

- All the workers are well aware of the participation committee members.

-PC members are not treated less favorably than other workers.

-PC members can carry out their duties within working hours without affecting their pay.

- The facility adheres to all relevant laws concerning the specified Code Area. Documentation and audit reports confirm full compliance with legal requirements.

#### Evidence Examined:

1. Freedom of association policy review
2. Facility management interviews
3. Worker interview
4. Complain box register (Suggestions from the complaint box and actions taken)
5. Participation Committee formation record review and its meeting records review, Grievance handling policy & procedure

## 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? Not Applicable

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

### 3. Working conditions are safe and hygienic

#### Management systems

|  |   |
|--|---|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems   |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems   |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Some Improvements Recommended   |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Some Improvements Recommended   |
| Explanation for management systems grades  | <ul style="list-style-type: none"> <li>• Health and Safety Policy:<br/>• The factory has a clear policy that prioritizes the safety and health of all workers. This policy includes guidelines on safe working practices, the use of protective equipment, and emergency procedures. It is communicated to all workers and supervisors.</li> <li>• Regular Safety Inspections and Risk Assessments:<br/>• The factory conducts regular safety inspections and risk assessments to identify potential hazards. These checks help find and fix any unsafe conditions or equipment quickly, preventing accidents. Last risk assessment conducted on 14.08.2024.</li> <li>• Proper Safety Equipment and Training:<br/>• All workers are provided with the necessary training on - Child Labor &amp; Force Labour Training-10.10.2024, First Aid training- 14.10.2024, Firefighting training- 14.10.2024, Health &amp; safety training- 26.06.2024, PPE Training- 13.10.2024.</li> <li>• Responsible person: Facility has appointed Md. Sukur Ali-Manager (HR &amp; Compliance) for monitoring this Code &amp; related issues.</li> <li>• Regular Health and Safety Audits:<br/>• Internal audits are conducted once in every 6 months to ensure that the factory complies with all health and safety regulations and standards. This helps identify areas for improvement. Last internal audit conducted on 25.06.2024.</li> <li>• Continuous Improvement:<br/>The factory continuously reviews and updates its health and safety policies and practices based on audit results, worker feedback, and changes in regulations to keep improving safety conditions. They need to improve their monitoring because there was some NC which is mentioned in the workplace requirement.</li> </ul> |

#### Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|-----------|-----------------------|-----------|---------|
|-----------|-----------------------|-----------|---------|

|  |  |    |    |                              |
|--|--|----|----|------------------------------|
| <b>3. Working conditions are safe and hygienic</b> | 3.N Maintain a log of all hazardous substance... | §1 | NC | <a href="#">ZAF600692470</a> |
|  | 3.O Implement an appropriate electrical safet... | §2 | NC | <a href="#">ZAF600692471</a> |
|  | 3.A Ensure a safe working environment. Put in... | §3 | NC | <a href="#">ZAF600692472</a> |
|  | 3.H Where identified as necessary to reduce r... | §4 | NC | <a href="#">ZAF600692474</a> |
|  | 3.O Implement an appropriate electrical safet... | §5 | NC | <a href="#">ZAF600718310</a> |
|  | 3.L Implement effective processes to manage f... | §6 | NC | <a href="#">ZAF600718311</a> |

**Systems and evidence examined to validate this code section**

1. General Health and Safety Management
  - Potable water was freely available in all areas.
  - Sufficient clean toilets 42 (22 for male and 20 for female) segregated by gender were available at all times for workers.
  - Ventilation, temperature and lighting were adequate for the production processes.
  - Facility doctor and medical assistant maintains injury register for the injuries occurred in the facility. Facility has submitted the injury register to the labor office on August 2024.
  - Facility has conducted root cause analysis for all the individual injury occurred.
2. Fire Safety
  - Sufficient assembly area was found in front of the facility building.
  - Firefighting equipment was adequate and checks were up-to-date.
  - The facility management posted the evacuation plans on production floors with local language.
  - Public Address System and Fire Alarm System were available in all areas. However, In the Facility a. two aisles found partially blocked by thread sucker machine in sewing section on 1st & 2nd floor at building-01. b. 03 out of 10 aisle blocked by sewing machine & table in sewing section on 1st, 2nd & 3rd floor at building-01. c. 3 female workers were blocked by table & production materials in sewing section on 1st & 2nd floor at building-01. d. 1 emergency window blocked by table fabrics etc in sewing section on 1st floor at building-01. e. no aisles mark in finished goods area on 3rd floor at building-01. f. 3 aisles found faded in sewing section in sewing section on 1st floor at building-01.
4. Electrical, Machine & Fire Safety
  - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
  - Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
  - Facility maintains a scheduled maintenance plan for doing maintenance of all machines.
  - All the machineries are safely guarded. However, It was noted through documents review and management interview that unsafe electric wirings were found on fusing machine in the cutting section on 4th floor at building-1.
5. Chemical safety
  - Facility doesn't uses chemical for their production process. Facility uses Spot Lifter 833 for Sport removing work.
6. Medical services
  - There were 16 first aid boxes with sufficient kits in the full facility.
  - Facility has appointed 01 doctor and 1 Nurse who are available in working time of the facility. They also arranged monthly first aid training with first aiders.
  - Facility has a medical room for it's worker
7. Dormitory
  - Facility didn't provide dormitory facilities to any employees.
8. Fire drill:
  - Internal day fire drill was held on 05.11.2024. Participated Male 300, Female 503 and total time counted 4:11 mints
  - Facility had conducted External fire drill last on 16.10.2024 and was conducted by Fire Service and Civil Defense. Participated male 321, female 482 and total time counted 03:30 mints
9. Training:
  - a) Child labor training: 10-10-2024
  - b) Forced labor training: 25.07.2024
  - c) Anti harassment training: 13.10.2024
  - d) Discrimination training: 16.09.2024
  - e) Health and safety training: 26.06.2024
  - f) PPE training: 13.10.2024
  - g) Fire training: 14.10.2024
  - h) First Aid training: 14.10.2024
  - i) Disciplinary procedure training: 16.09.2024

- j) Anti-corruption training: 10.09.2024
- k) Freedom of Association & collective agreement training: 10.10.2024
- L) machine safety training: 11.09.2024
- m) Legal rights training: 11.09.2024
- n) Grievance procedure training: 18.09.2024
- o) Electrical safety training: 23.09.2024
- p) ETI base code training: 07.10.2024
- q) Mid level management training: 13.06.2024
- r) Chemical Safety training: 24.10.2024

#### 10. Risk assessment

Facility conducts risk assessment at least twice every year and if any new process or machine is added. Risk assessment was last conducted on 14.08.2024.

#### 11. Safety committee:

- Facility has formed a safety committee as per legal requirement. PC committee election was conducted on 23 November, 2022.
- Total member of safety committee are 12 (06 from worker side and 06 from management side).
- Last meeting was conducted on 13.10.2024 which is in line with legal requirement.

#### Evidence examined:

1. License review (Fire license, Trade license, Factory license)
  2. Building approval plan and layout approval plan
  3. Group insurance
  4. Drinking water test report
  5. Injury record and analysis report
  6. Machine and electric maintenance record
  7. Risk assessment report
  8. Training record (Fire training, First aid training, PPE training and Health and safety training)
  9. Fire drill record
  10. Health and safety committee register
  11. Fire equipment and electric equipment checking record
-

# Findings: non-compliances

ZAF600692470

Non-compliance

Due 2024-02-07

## Code area

3 Working conditions are safe and hygienic

## Status

Open\*

## Workplace requirement

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

## Time given to resolve

30 days

## Issue title

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

## Verification method

Desktop audit

## Area of non-compliance/non-conformance

Local law

## Description

During plat tour, it was noted that eye wash station found non-functional in the spot removing station on 1st floor at the building- 01.

## Description (carried over)

During plat tour, it was noted that eye wash station found non-functional in the spot removing station on 1st floor at the building- 01.

## Corrective and preventative actions

It is recommended that the facility management should ensure work properly the eye wash station at the mentioned area.

## Corrective and preventative actions (carried over)

It is recommended that the facility management should ensure work properly the eye wash station at the mentioned area.

## Local law reference

"The Bangladesh Labour Act, 2006, Section 79 (a & e): Where the Government is satisfied that any operation carried on in an establishment exposes any person employed in it to a serious risk of bodily injury, poisoning or disease, it may, by rules, make the following provisions for such establishment, namely: (a) to declare which operations are hazardous; (e) to give notice of any corrosive chemicals and of precautions to be taken in their use"

## Evidence



[Eye wash station Non-functional.JPG](#)



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**ZAF600692471**

**Non-compliance**

Due 2024-05-07

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

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

**Time given to resolve**

120 days

**Issue title**

221 - Inadequate electrical safety inspections conducted, including on lighting

**Verification method**

Desktop audit

**Description**

It was noted during plant tour and management interview that no lightning arrester (LPS) was installed on the rooftop of the factory buildings & shed. NC timeline was increased by discussing with the auditee

**Area of non-compliance/non-conformance**

Local law

**Description (carried over)**

It was noted during plant tour and management interview that no lightning arrester (LPS) was installed on the rooftop of the factory buildings & shed. NC timeline was increased by discussing with the auditee

**Corrective and preventative actions**

It is recommended that the facility shall install lightning arrester (LPS) on the rooftop of the factory buildings and shed.

**Corrective and preventative actions (carried over)**

It is recommended that the facility shall install lightning arrester (LPS) on the rooftop of the factory buildings and shed.

### Local law reference

Bangladesh National Building Code, 2020, Part 3, 1.22: Lightning protection measures shall be installed on all buildings whose exposure conditions indicate the likelihood of lightning strike and consequential hazard to life and property. Buildings housing explosives or detonators, buildings where a large number of people live or congregate and those that are of strategic or defense importance shall always be protected against lightning strikes. The requirement of lightning protection systems shall be assessed and they shall be designed and installed in accordance with the provisions of Chapter 2 of Part 8.

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ZAF600692472

Non-compliance

Due 2024-02-07

### Code area

3 Working conditions are safe and hygienic

### Status

Open\*

### Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

### Time given to resolve

30 days

### Issue title

397 - Childcare facilities are not provided in alignment with legal requirements

### Verification method

Desktop audit

### Description

During floor tour & management interview, it was observed that facility had a childcare room on the ground floor at the building- 01 but no designated caregiver for look after of child's.

### Area of non-compliance/non-conformance

Local law

### Description (carried over)

During floor tour & management interview, it was observed that facility had a childcare room on the ground floor at the building- 01 but no designated caregiver for look after of child's.

### Corrective and preventative actions

The management should provide its workers with a functioning, presentable childcare facility and appoint a caregiver to take care of the children.

### Corrective and preventative actions (carried over)

The management should provide its workers with a functioning, presentable childcare facility and appoint a caregiver to take care of the children.

### Local law reference

"In accordance with The Bangladesh Labour Act 2006, Chapter-8, Section-94 (2): Such rooms shall provide adequate accommodation, adequately lighted and ventilated and maintained in a clean and sanitary condition and shall be under the charge of woman trained or experienced in the care of children and infants. In accordance with The Bangladesh Labor Rules 2015, Chapter-8, Section-94: 1) The layout, quality and position of the Children's Room or the separate Children Building or the adapted building must be approved by the Inspector General or the Inspector authorized by him/her. 2) A separate and screen covered area must be kept preserved for the breastfeeding mothers so that they can lactate their babies maintaining secrecy and modesty. 3) The floor of the Children's Room and the internal walls thereof with a height of 1.22 meters must be made smooth and impervious. 4) 0.25 liters of milk for each child and nutritious foods must be supplied for the children staying in Children's Room. Bangladesh Gazette, Extra, September 15, 2015 7375 5) Neat and clean clothes must be provided for the employees working in Children's Room. 6) Females must be prioritized while recruiting employees for the Children's Room. "

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ZAF600692474

Non-compliance

Due 2024-02-07

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

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

**Time given to resolve**

30 days

**Issue title**

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

**Verification method**

Desktop audit

**Description**

It was noted through the floor visit that- a) The facility did not provide hand gloves and respiratory masks to spot removing operator on the 1st floor at the building- 01. b) the facility did not provide anti-fatigue mats to around 30 percent of the finishing section's standing workers.

**Area of non-compliance/non-conformance**

Local law

**Description (carried over)**

It was noted through the floor visit that- a) The facility did not provide hand gloves and respiratory masks to spot removing operator on the 1st floor at the building- 01. b) the facility did not provide anti-fatigue mats to around 30 percent of the finishing section's standing workers.

**Corrective and preventative actions**

It is recommended that the facility management should provide appropriate PPE(s) to all mentioned area workers and ensure the usage of PPE(s) while these are required during works.

**Corrective and preventative actions (carried over)**

It is recommended that the facility management should provide appropriate PPE(s) to all mentioned area workers and ensure the usage of PPE(s) while these are required during works.

**Local law reference**

In accordance with The Bangladesh Labour Rules, 2015, Rule 67 (2 & 3): 2) In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. 3) No worker can be employed in the relevant works without ensuring safety and health protection measures and the training related therewith. In addition, personal safety equipment must be preserved in accordance with Information Form-23.

**Evidence**



[Spot removing Operator.JPG](#)



[Workers working without rabar mats-02.JPG](#)



[Workers working without rabar mats-01.JPG](#)



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**ZAF600718310**

**Non-compliance**

Due 2025-01-29

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

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

**Time given to resolve**

60 days

**Issue title**

224 - Isolated occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs

**Verification method**

Desktop audit

**Description**

It was noted through documents review and management interview that unsafe electric wirings were found on fusing machine in the cutting section on 4th floor at building-1.

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

It is recommended that the facility management shall ensure safety measures for mitigating the risk of loose electric wirings at the mentioned area.

**Local law reference**

In accordance with The Bangladesh Labour Rules, 2015, Rule 58 (7): (7) All of the electric wiring and switch boards have to be complete by the non-passing elements through 'conceal wiring'.

**Evidence**



[Wire laying at the Floor unsafe Condition.JPG](#)



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**ZAF600718311**

**Non-compliance**

Due 2024-12-30

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

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

**Time given to resolve**

30 days

**Issue title**

207 - Isolated or partial occurrence of blocked fire exits causing an elevated but not significant risk

**Verification method**

Desktop audit

**Area of non-compliance/non-conformance**

Local law  
Base code

**Description**

It was noted that-

- a. two aisles found partially blocked by thread sucker machine in sewing section on 1st & 2nd floor at building-01.
- b. 03 out of 10 aisle blocked by sewing machine & table in sewing section on 1st, 2nd & 3rd floor at building-01.
- c. 3 female workers were blocked by table & production materials in sewing section on 1st & 2nd floor at building-01.
- d. 1 emergency window blocked by table fabrics etc in sewing section on 1st floor at building-01.
- e. no aisles mark in finished goods area on 3rd floor at building-01.
- f. 3 aisles found faded in sewing section in sewing section on 1st floor at building-01.

**Corrective and preventative actions**

It is recommended that the factory should ensure the pathway are free from any obstacle and ensure for the safe evacuation in case of emergency.

**Local law reference**

"In accordance with The Bangladesh Labor Act 2006, Chapter- 6, Section – 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.  
In accordance with Bangladesh Labor Law 2006, Section 72 (c): 2 passages and stairways shall be clean, wide and clear of all obstructions 3 [;] and 4 [(d) an employer may, for overall safety of the factory and workers, bring the passages of movements, stairs, gates, godowns and common utility area of the place of work under close circuit camera."

**Evidence**



[Aisle faded.JPG](#)



[Worker blocked-02.JPG](#)



[Worker blocked-01.JPG](#)



[Aisles obstructed by thread sucker machine-01.JPG](#)



[Aisle blocked by table.JPG](#)



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### 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<br>Yes, qualified safety officer           |
| Do workers operate high risk or heavy machinery or vehicles as part of their jobs?  | Yes  |
| Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?                                    | Yes<br><br>Workers use spot lifter 833 chemical for their spot removing process. |
| Who organises accommodation for workers?  | Workers independently arrange their own accommodation                            |
| Who organises worker transportation between accommodation and worksite?   | Workers organise their own transport   |
| 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?                     | Not Applicable<br><br>Not applicable as no structural additions were found.      |
| Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?  | No   |
| Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally? | No   |
| Does the site have a structural engineer evaluation?  | Yes  |

## 4. Child labour shall not be used

### Management systems

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

Robust Management Systems

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

Robust Management Systems

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

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

Policy Against Child Labour:

- The factory has a clear, written policy that strictly prohibits the use of child labor. This policy follows all local and international laws and standards on minimum working age. It is communicated to all workers, supervisors, and hiring agencies.

• Strict Age Verification Process:

- The factory has a reliable process to verify the age of all workers during hiring. This includes checking official documents like birth certificates, national IDs, or passports to ensure that no children are hired. Youngest worker in the facility was found 18+ years old. Date of birth 21.01.2006 and date of join 21.05.2024.

• Remediation Plan if Child Labour is Found:

- If a child is mistakenly hired, the factory has a clear remediation plan. This plan includes safely removing the child from work, providing support for their education, and ensuring their well-being, without any negative impact on the child or their family.

Responsible person:

- Facility Nominated Md. Sukur Ali-Manager (HR & Compliance) to look after this code. He is responsible to coordinate all the awareness program on this code with his team.

• Training for Staff on Child Labour Prevention:

- Regular training is provided for all staff involved in hiring and management on the importance of preventing child labor, understanding legal requirements, and recognizing fake documents. Last training was conducted on 10.10.2024. The facility have conducted training regarding the Recruitment & Hiring procedures only for the production management e.g. supervisor, Line cheif, Production Manager & not included any HR personnel.

• Monitoring and Auditing:

- Facility conducted internal audit on "Child labour" on 25.06.2024.

### Summary of findings

| Code area  | Workplace requirement  | Local law | Finding |
|--|--|-----------|---------|
| <b>Systems and evidence examined to validate this code section</b> | No findings  |           |         |
|  | <p>1. There are no apparent concerns related to child labor at the factory.</p> <p>2. The factory has a policy in place to participate in and contribute to programs that provide for the transition of a child found to performing child labor in order to enable the child to attend and remain in quality education until no longer a child.</p> <p>3. No juvenile workers (14 to below 18 age) are employed at the factory.</p> <p>4. All practices regarding youth employment at the factory appear to be in line with ILO conventions.</p> <p>5. Facility has a recruitment policy where it is mentioned that the facility reviews original photographic identification like National Id Card, Birth Certificate to validate that all workers are at least 14 years of old at the time of employment.</p> <p>6. Facility has policy &amp; procedure on "Child labor Remediation"</p> <p>7. No worker under 18+ years of age was found in the facility. Youngest worker in the facility was found 18 years old. Date of birth 21.01.2006 and date of join 21.05.2024</p> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>- Policy and Procedure</li> <li>- Personnel files of 42 sampled workers.</li> <li>- Latest list of employees.</li> <li>- Age proof documents like Computerized National Identity Card, Birth certificates and educational certificates</li> </ul> |           |         |

4. Child labour shall not be used

## Data points

|   |                |
|---|----------------|
| Percentage of workers that are age 24 or younger                                    | 44%            |
| Enter the legal age of employment   | 14             |
| Enter the age of the youngest worker identified                                     | 18             |
| Enter the number of workers under local legal minimum age                           | 0              |
| Enter the number of workers under 15 years old                                      | 0              |
| Percentage of workers that are apprentices, trainees or interns                     | 0%             |
| Were there children present on the work floor but not working at the time of audit? | No             |
| Do children live at the accommodation provided to workers?                          | Not Applicable |

## 5. Legal wages are paid

### Management systems

|  |                           |
|--|---------------------------|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems |

## Management systems

### Explanation for management systems grades

#### Wage & Benefit Policy:

The factory has a clear policy stating that all workers must be paid at least the legal minimum wage or higher. This policy is communicated to all workers and management to ensure everyone understands wage entitlements.

#### Accurate Wage Calculation:

The factory has a reliable system for calculating wages that ensures all workers are paid correctly based on their hours worked, overtime, and any applicable benefits. This includes accurate record-keeping for hours worked and pay calculations. Currently facility is following the recent minimum wage gazette for garments section which was published in December 2023.

#### Timely Wage Payments:

Workers are paid on a regular, agreed-upon schedule, such as weekly or monthly. Payments are made on time which is within 7 working days of the following month.

#### Transparent Pay Slips:

Workers receive detailed pay slips that clearly show their earnings, deductions, and net pay. Pay slips are provided regularly in local language which help workers understand how their wages are calculated.

#### No Unauthorized Deductions:

The factory does not make any unauthorized deductions from workers' wages. The only deduction that is been made is the absent deduction which is followed by Bangladesh local law 2006, clause 125.

#### Fair Payment for Overtime and Benefits:

Workers are paid fairly for any overtime work and receive all legally required benefits, such as vacation pay, sick leave, and bonuses. Overtime pay rates comply with legal standards which is 200% of hourly basic wage. Facility provides 50% of gross salary as bonus twice in a year as festival bonus.

#### Responsible person:

Facility Nominated Md. Sukur Ali-Manager (HR & Compliance) to look after this code. He is responsible to coordinate all the awareness program on this code with his team.

#### Training:

Workers are trained on working hours at the beginning stages of the employment and also if any changes is introduced by law or internal policies. Last training was conducted on 07.10.2024 which was included in the ETI base Code Training.

#### Effective Record-Keeping:

The factory maintains accurate records of wage payments, working hours, and employment contracts. These records are regularly reviewed to ensure compliance with wage laws and are available for audits if needed. On the day of audit proper documentation was found on time records, salary sheets, pay slip for the previous 12 months.

#### Monitoring and Auditing:

Facility implemented internal audit on "Wages & Benefits policies" to establish a system Last internal audit conducted on 25.06.2024 which includes all the sections of ETI base code.

## Summary of findings

| Code area | Workplace requirement | Local law | Finding |
|-----------|-----------------------|-----------|---------|
|-----------|-----------------------|-----------|---------|

5. Legal wages are paid

5.H Comply with all other applicable laws tha...

GE [ZAF600718312](#)

**Systems and evidence examined to validate this code section**

**Current System:**

- During current assessment it was noted that facility provides 12500 as minimum wage which is comply legal minimum wage. Based on the Gazette Notification, the actual lowest minimum wage in the facility is BDT 12,500 per month.
- During current assessment it was noted that factory provide group insurance benefits to workers.
- As per local law no deduction for disciplinary. During disciplinary action procedure review it was noted that there are no disciplinary record in the facility.
- Though wages records review It was noted that if workers attend training & meeting facility did not deduct for this time.
- It was noted through wages records, pay slip records review that rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave written in a language (Bangla) worker understand.
- It was noted through pay slip records review & workers & management interview that Each employee was given a understandable pay slip and signed for their wages.
- Time keeping is finger punch system.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- All employees were paid within 7 working days of the following month.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- According to the documents which were provided by the HR & Accounts Departments and during the workers interview, it was noted that factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Moreover, employees were allowed to take 14 days' sick leave; 10 days' casual leave according to law and 11 days' festival leave.

**Evidence examined:**

1. Document review
2. Worker interview
3. Management interview
4. Local and national laws
5. Wages and benefits policy
6. Local legal minimum wage documents
7. Payroll records from November 2023 to audit day
8. Leave records
9. Social group insurance and payment receipts from the local labour department
10. Labour contracts for all employees

## Findings: good examples

ZAF600718312

Good example

### Code area

5 Legal wages are paid

### Workplace requirement

5.H Comply with all other applicable laws that impose conditions on Code Area 5.

### Description

The facility provide attendance bonus BDT 525 to 725 to all workers as per company policy.

## 5. Legal wages are paid

### Data points

|  |  |
|--|--|
| What is the basic wage paid to workers?  | The legal minimum wage<br>Wages are based on job skills and experience |
| 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?               | Between 1 and 10%  |

### 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 |
| 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 |

|                                     |                            |                |
|-------------------------------------|----------------------------|----------------|
| <b>Actual overtime hours</b>        | <b>Max hours per day</b>   | 2.0            |
|                                     | <b>Max hours per week</b>  | 12.0           |
|                                     | <b>Max hours per month</b> | 50.0           |
| <b>Minimum legal wage</b>           | <b>Min per hour</b>        | Non applicable |
|                                     | <b>Min per day</b>         | Non applicable |
|                                     | <b>Min per week</b>        | Non applicable |
|                                     | <b>Min per month</b>       | 12500.0        |
| <b>Actual minimum wage</b>          | <b>Actual per hour</b>     | Non applicable |
|                                     | <b>Actual per day</b>      | Non applicable |
|                                     | <b>Actual per week</b>     | Non applicable |
|                                     | <b>Actual per month</b>    | 12500.0        |
| <b>Minimum legal overtime wage</b>  | <b>Min per hour</b>        | 64.42          |
|                                     | <b>Min per day</b>         | Non applicable |
|                                     | <b>Min per week</b>        | Non applicable |
|                                     | <b>Min per month</b>       | Non applicable |
| <b>Actual minimum overtime wage</b> | <b>Actual per hour</b>     | 64.42          |
|                                     | <b>Actual per day</b>      | Non applicable |
|                                     | <b>Actual per week</b>     | Non applicable |
|                                     | <b>Actual per month</b>    | Non applicable |

## Wage analysis

|  |  |
|--|--|
| <b>Number of workers' records checked</b>          | 42   |
| <b>Provide the date and details of the records</b> | 42 Sample Selected from October 2024(Current month), April 2024 (Random Month),November 2023 (Random Month). |

|  |  |
|--|--|
| <b>Are there different legal minimum/ legally recognised CBAs wage grades?</b>   | <p>Yes</p> <p>The Government has announced the new pay structure, which was implemented from 18th December, 2023 for the workers of the Garments Industries. For the workers (Schedule A):<br/> Grade No.1 (Monthly basic wage-Tk. 8390, House rent 50% of the basic-Tk. 4195, Medical allowance-Tk.750, Conveyance allowance-Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 15035)/ Grade 2 (Monthly basic wage-Tk. 7882, House rent 50% of the basic-Tk. 3941, Medical allowance- Tk.750, Conveyance allowance- Tk.450, Food subsidy- Tk.1250, Gross Monthly Wage- Tk. 14273)/ Grade 3 (Monthly basic wage- Tk. 7400, House rent 50% of the basic-Tk. 3700, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 13550)/ Grade 4 (Monthly basic wage-Tk. 6700, House rent 50% of the basic-Tk. 3350, Medical allowance-Tk.750, Conveyance allowance-Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 12500)/ Apprentice (Monthly basic wage-Tk. 4950, House rent 50% of the basic-Tk. 2475, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 9875)<br/> For the staff level (Schedule B) employees:<br/> Grade 1 (Monthly basic wage-Tk.10900, House rent 50% of the basic-Tk.5450, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy- Tk.1250, Gross Monthly Wage-Tk. 18800)/ Grade 2 (Monthly basic wage- Tk.9000, House rent 50% of the basic- Tk.4500, Medical allowance- Tk.750, Conveyance allowance-Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage-Tk. 15950)/ Grade 3 (Monthly basic wage- Tk.8500, House rent 50% of the basic- Tk.4250, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 15200)/ Grade 4 (Monthly basic wage-Tk.6900, House rent 50% of the basic- Tk.3450, Medical allowance- Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 12800)/ Apprentice (Monthly basic wage-Tk.5000, House rent 50% of the basic- Tk.2500, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy- Tk.1250, Gross Monthly Wage-Tk. 9950)</p> |
| <b>For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?</b> | <p>Above legal minimum</p>   |
| <b>Indicate the breakdown of workforce per earnings</b>  | <p>The facility provides legal minimum wage (12500) to 20% workers and provides above legal minimum wage to 80% workers.</p>   |
| <b>Are there any bonus schemes used?</b>   | <p>Yes</p> <p>1.The facility provides festival bonus 50% of gross to all workers as per company policy.<br/> 2.The facility provide attendance bonus BDT 525 to 725 to all workers as per company policy.</p>  |
| <b>Were accurate records shown at the first request?</b>   | <p>Yes</p>   |
| <b>Were any inconsistencies found?</b>   | <p>No</p>  |

## 5.A. Living wages are paid

### Summary of findings

| Code area  | Workplace requirement  | Local law | Finding     |
|--|--|-----------|-------------|
|  |  |           | No findings |
| <b>Systems and evidence examined to validate this code section</b> | <p>1. Facility has conducted a worker's survey on living wage calculation on July 2023-June 2024. Also, they did the gap analysis. According to the survey which was conducted on 60 workers. As per the calculation workers are getting above minimum wage.</p> <p>Evidence examined:</p> <ol style="list-style-type: none"> <li>1. Living wage calculation.</li> <li>2. Worker interview.</li> <li>3. Management interview.</li> </ol> |           |             |

## 6. Working hours are not excessive

### Management systems

|  |  |
|--|--|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems  |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems  |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems  |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems  |
| Explanation for management systems grades  | <p><b>Working Hour Policy:</b><br/>The factory has a policy that defines standard working hours, overtime limits, rest periods, and breaks in line with legal requirements. As per policy a worker shall work 8 hours as regular hours, after the regular hour they can work maximum 2 hours of OT if needed with their consent. Within this timeline they will get 1 hour meal break. Also, they will get 1 day weekend on Friday.</p> <p><b>Timekeeping System:</b><br/>A electronic timekeeping system is in place to accurately track and record working hours, including overtime, ensuring transparency. Workers can check their time records any time they want and can.</p> <p><b>Fair Overtime Practices:</b><br/>Overtime is voluntary and compensated at a premium rate which is 200% of hourly basic wage following legal and company guidelines. If any workers do overtime on weekend, they will get 1 day leave and 2 days basic salary as compensation.</p> <p><b>Responsible person:</b><br/>• Facility Nominated Md. Sukur Ali-Manager (HR &amp; Compliance) to look after this code. He is responsible to coordinate all the awareness program on this code with his team.</p> <p><b>Training:</b><br/>Workers are trained on working hours at the beginning stages of the employment and also if any changes is introduced by law or internal policies. Last training Legal Rights Training conducted on 11.09.2024. Last ETI base code training conducted on 07.10.2024b where this code area was included in the training.</p> <p><b>Monitoring and Auditing:</b><br/>Facility implemented internal audit on "Working Hours" to establish a system. The facility management conducted internal audit twice in a year. Last internal audit conducted on 25.06.2024 which has included this code area.</p> |

### Summary of findings

| Code area  | Workplace requirement  | Local law | Finding |
|--|--|-----------|---------|
| <b>Systems and evidence examined to validate this code section</b> | No findings  |           |         |
|  | <p>•In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employees' interviews, no inconsistency was noted either.</p> <ul style="list-style-type: none"> <li>•Through employees' interview, overtime is voluntary.</li> <li>•Time cards are completed electronically.</li> <li>•All overtime is compensated at a premium rate for all employees.</li> <li>•The time frame of the records reviewed are as follows:</li> </ul> <p>42 samples from the month of October 2024 (Current month)<br/>           42 samples from the month of April 2024 (Random month)<br/>           42 samples from the month of November 2023 (Random Month)</p> <p>According to time records and worker interview basic working hours were 8 hours per day and a max 48 hours per week. Maximum OT 02 hours per day and 12 hours per week were found in the sample months. The employee works for 06 days in a week. Weekend of the factory was Friday. All section is operating in one shift starts from 08:00 to 17:00 with one hour lunch break from 13:00 to 14:00. Only security has three shifts per eight hours each with roster schedule of break &amp; weekend.</p> |           |         |

## 6. Working hours are not excessive

### Data points

|   |   |
|---|---|
| Is the sample size the same as in the wages section?  | Yes   |
| Normal day overtime premium as a percentage of standard wages   | 200%  |
| If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?   | Not applicable as the facility pays 200% of hourly basic wage as overtime 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?                  | 54.0  |
| In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site? | 60.0  |
| Maximum number of days worked without a day off in sample   | 6   |

## 7. No discrimination is practiced

### Management systems

|  |                           |
|--|---------------------------|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems |

## Management systems

### Explanation for management systems grades

**Anti-Discrimination Policy:**

- The factory has a written policy that strictly prohibits all forms of discrimination based on race, gender, age, religion, disability, sexual orientation, or any other personal characteristic. This policy is shared with all workers and management.

**Equal Opportunity Hiring:**

- The factory follows fair hiring practices that ensure all candidates have an equal chance of employment. Job postings, recruitment processes, and selection criteria are designed to avoid any bias or discrimination. Currently there are 40% of male workers and 60% of female workers in the facility.

**Fair Treatment in the Workplace:**

- All workers are treated fairly in terms of job assignments, promotions, pay, and benefits. Decisions are based on qualifications, performance, and merit, not personal characteristics.

**Accessible Reporting Mechanism:**

- The factory provides an easy and confidential way for workers to report any incidents of discrimination or harassment. Workers can raise their grievance via complain box, hotline or verbally to management and worker representatives. Reports are taken seriously and investigated promptly.

**Responsible person:**

- Facility Nominated Md. Sukur Ali-Manager (HR & Compliance) to look after this code. He is responsible to coordinate all the awareness program on this code with his team.

**Training on Diversity and Inclusion:**

- All workers, supervisors, and managers receive regular training on diversity, inclusion, and anti-discrimination. This training helps everyone understand and respect differences and recognize and prevent discriminatory behavior. Facility also provided grievance training which includes the reporting process if anyone felt discriminated. Last discrimination Training conducted on 16.09.2024.

**Monitoring and Auditing:**

- Facility implemented internal audit on "Anti-Discrimination" to establish a system. The facility management conducted internal audit twice in a year. Last internal audit conducted on 25.06.2024 which has included this code area.

## Summary of findings

| Code area | Workplace requirement | Local law | Finding     |
|-----------|-----------------------|-----------|-------------|
|           |                       |           | No findings |

**Systems and evidence examined to validate this code section**

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The factory provides the same wage amount to male/ female employees of the same rank.
- There is no restriction for formation of Worker participation committee in the factory.

**Evidence Examined:**

1. Grievance register
  2. Grievance policy
  3. Grievance training
  4. Wages & benefits
  5. Termination records review
  6. Time cards
  7. Disciplinary procedure
-

7. No discrimination is practiced

## Data points

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

## 8. Regular employment is provided

### Management systems

|  |  |
|--|--|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems  |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems  |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems  |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems  |
| Explanation for management systems grades  | <p><b>Clear Employment Contracts:</b></p> <ul style="list-style-type: none"> <li>• As per policy the factory provides all workers with clear, written contracts that outline the terms of regular employment. These contracts specify job roles, duties, wages, working hours, and the length of employment.</li> </ul> <p><b>Stable Employment Practices:</b></p> <ul style="list-style-type: none"> <li>• The factory ensures that workers are hired with the expectation of ongoing employment rather than temporary or casual contracts, except where temporary work is legally required or agreed upon.</li> </ul> <p><b>Job Security and Continuity:</b></p> <ul style="list-style-type: none"> <li>• Workers are provided with job security and continuity, including clear terms for termination or resignation. This means workers are not left uncertain about their employment status without proper notice or reason.</li> </ul> <p><b>Regular Work Hours:</b></p> <ul style="list-style-type: none"> <li>• The factory sets regular work hours and schedules, and workers are given a predictable work routine. Any changes to work hours or schedules are communicated in advance and managed fairly.</li> </ul> <p><b>No Unjust Termination:</b></p> <ul style="list-style-type: none"> <li>• The factory has clear policies against unjust termination. Workers can only be terminated for valid reasons, such as poor performance or misconduct, and with proper notice or severance pay according to the terms of their contract.</li> </ul> <p><b>Training and Development:</b></p> <ul style="list-style-type: none"> <li>• The factory provided training on Regular employment which covers the development opportunities to regular employees to support their career growth and skills enhancement. Last ETI base code training conducted on 07.10.2024.</li> </ul> <p><b>Monitoring and Auditing:</b></p> <ul style="list-style-type: none"> <li>• Facility has conducted internal audit regularly. Last internal audit conducted on 25.06.2024. Facility nominated Md. Sukur Ali-Manager (HR &amp; Compliance) is responsible for monitoring this Code &amp; related issues.</li> </ul> |

## Summary of findings

| Code area  | Workplace requirement   | Local law | Finding |
|--|---|-----------|---------|
|  | No findings   |           |         |
| <b>Systems and evidence examined to validate this code section</b> | <ul style="list-style-type: none"> <li>•All employees were recruited by the factory directly.</li> <li>•No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.</li> <li>•There was no sub-contractor in the factory.</li> <li>•All workers getting signed labor contract and ID card during their recruitment.</li> <li>•Factory maintains service books for all workers</li> <li>•Factory has policy to provide all kinds of compensation and benefits to the employees</li> <li>•If any employees want to leave the job, he or she may leave giving 60 days' notice prior to leave as per law.</li> <li>•No temporary worker, apprenticeship schemes or home worker was identified by the auditor.</li> </ul> <p>Evidence examined:</p> <ol style="list-style-type: none"> <li>1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc.</li> <li>2. Management interview and employee interview</li> <li>3. The hiring and termination records.</li> <li>4. Worker interview.</li> </ol> |           |         |

8. Regular employment is provided

## Data points

---

|  |        |
|--|--------|
| Percentage of workers that are permanently or temporarily employed | 100.0% |
|--|--------|

---

|   |      |
|---|------|
| Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment | 0.0% |
|---|------|

---

|  |      |
|--|------|
| Percentage of workers employed as apprentices, trainees or interns | 0.0% |
|--|------|

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

### Management systems

|  |  |
|--|--|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems  |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems  |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems  |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems  |
| Explanation for management systems grades  | <p>Policies on Sub-Contracting and Homeworkers:</p> <ul style="list-style-type: none"> <li>The factory has written policies outlining how sub-contractors and homeworkers are selected and managed. These policies ensure that all sub-contracting and homework arrangements comply with legal standards and ethical practices.</li> </ul> <p>Responsible person:</p> <ul style="list-style-type: none"> <li>The facility uses 1 subcontract factories, Facility nominated one person to monitor this code named Md. Sukur Ali-Manager (HR &amp; Compliance).</li> </ul> <p>Training and Support:</p> <ul style="list-style-type: none"> <li>The factory provides training and support to sub-contractors on the working procedure &amp; relevant standards, including safety practices, fair wages, and workers' rights verbally.</li> </ul> <p>Monitoring and Auditing:</p> <ul style="list-style-type: none"> <li>Facility implemented internal audit on ""Supplier &amp; Subcontractor"" to establish a system.</li> </ul> |

### Summary of findings

| Code area   | Workplace requirement | Local law | Finding |
|-------------|-----------------------|-----------|---------|
| No findings |                       |           |         |

**Systems and evidence examined to validate this code section**

- As per the facility documents review, management, worker interview and factory tour, there was no home working used by the facility currently.
- As per the facility documents review, management, worker interview and factory tour, there were 1 sub-contractor in the facility currently for their washing process.
- Sub-contractor list was shared with relevant clients and all the sub-contractors were authorized by the clients.
- Auditors have verified all the records and further verified through various internal and external challans.

**Evidence examined:**

- 1.Management interview & Workers interview
  - 2.Production capacity plan
  - 3.Material in/out register
  - 4.Production process of the factory
  - 5.Policies and procedure
-

## 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 homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
The facility's supplier does not buy any product or service that uses homeworker

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
No unrecorded subcontracting used on site

Are any sub-contractors used? Yes

|                         |                                |  |
|-------------------------|--------------------------------|--|
| <b>Sub-contractor 1</b> | <b>Processes subcontracted</b> | Washing  |
|                         | <b>Name of factory</b>         | Sinha knit & Denims Limited.                             |
|                         | <b>Address</b>                 | Plot#102, Mousa- Tenguri, Zirani Bazar,<br>Savar, Dhaka. |
|                         | <b>Dates used</b>              | 2022   |

## 9. No harsh or inhumane treatment is allowed

### Management systems

|  |   |
|--|---|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems   |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems   |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems   |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems   |
| Explanation for management systems grades  | <ul style="list-style-type: none"> <li>• Clear Anti-Harsh Treatment Policy:               <ul style="list-style-type: none"> <li>• The factory has a written policy that explicitly prohibits any form of harsh or inhumane treatment, including physical abuse, verbal abuse, harassment, or intimidation.</li> </ul> </li> <li>• Responsible Person:               <ul style="list-style-type: none"> <li>• The factory has nominated one person to monitor the Harassment issues named Md. Md. Sukur Ali-Manager (HR &amp; Compliance).</li> </ul> </li> <li>• Training and Awareness:               <ul style="list-style-type: none"> <li>• All workers, supervisors, and managers receive regular training on what constitutes harsh or inhumane treatment and how to prevent it. This training includes information on respectful behavior, appropriate disciplinary methods, and how to report any incidents of mistreatment. Anti- Harassment training is conducted once in every two months. Last Anti harassment training conducted on 13.10.2024.</li> </ul> </li> <li>• Accessible Reporting Mechanism:               <ul style="list-style-type: none"> <li>• The factory provides a simple and confidential way for workers to report any incidents of harsh or inhumane treatment. Worker can report their grievance via grievance box, hotline and verbally to worker representatives and management directly. Reports are taken seriously and investigated thoroughly.</li> </ul> </li> <li>• Promoting Respectful Behavior:               <ul style="list-style-type: none"> <li>• The factory promotes a culture of respect and dignity in the workplace. This includes encouraging positive behavior, open communication, and mutual respect among all workers.</li> </ul> </li> <li>• Effective Investigation and Resolution:               <ul style="list-style-type: none"> <li>• When a report of mistreatment is received, the factory conducts a thorough investigation to determine the facts. 4 cases was found related to argument among workers in the grievance register. Proper investigation was conducted as per Bangladesh Local Law 2006.</li> </ul> </li> </ul> <p>Monitoring and Auditing:</p> <ul style="list-style-type: none"> <li>• Facility has conducted internal audit regularly. Last internal audit conducted on 25.06.2024. Facility nominated Md. Sukur Ali-Manager (HR &amp; Compliance) is responsible for monitoring this Code &amp; related issues.</li> </ul> |

## Summary of findings

| Code area  | Workplace requirement  | Local law | Finding |
|--|--|-----------|---------|
|  | No findings  |           |         |
| <b>Systems and evidence examined to validate this code section</b> | <p>The facility has established an anti-harassment or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation shall be prohibited.</p> <ul style="list-style-type: none"> <li>- Anti-harassment issues, disciplinary policy and procedures are also covered in employee training.</li> <li>- Through the factory management and employees' interview, it was noted that no physical abuse happened in the factory.</li> <li>- There is an internal process for grievance, which is through the grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any requestion received complaint will be handled by management.</li> <li>- Facility has a system of body checking during exit of the workers. Facility rules indicates that the body checks are only conducted by the member of same sex and maintain full privacy of the workers.</li> </ul> <p>Evidence examined:</p> <ol style="list-style-type: none"> <li>1. The relevant policy on prevention of harassment and abuse</li> <li>2. Internal grievance procedure documentation.</li> <li>3. Training records</li> <li>4. Management interview and employee interview</li> </ol> |           |         |

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?

Grievance box, Verbal grievance system and Worker committee.

Number of grievances raised in the last 12 months 4

Number of grievances resolved in the last 12 months 4

## 10.A. Environment 2-Pillar

### Management systems

|  |  |
|--|--|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems  |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems  |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems  |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems  |
| Explanation for management systems grades  | <ul style="list-style-type: none"> <li>• Clear Environmental Policy: <ul style="list-style-type: none"> <li>• The factory has a written policy to reduce environmental impact, including waste management, energy use, and emissions control.</li> </ul> </li> <li>• Regulatory Compliance: <ul style="list-style-type: none"> <li>• The factory follows all environmental laws and regulations, including permits and reporting requirements.</li> </ul> </li> <li>• Responsible Person: <ul style="list-style-type: none"> <li>• Md. Sukur Ali-Manager (HR &amp; Compliance) is responsible for monitor the Environmental related issues.</li> </ul> </li> <li>• Employee Training: <ul style="list-style-type: none"> <li>• Workers are trained on environmental practices and their role in minimizing environmental impact.</li> </ul> </li> <li>• Regular Monitoring: <ul style="list-style-type: none"> <li>• The factory regularly monitors its environmental impact and performance, including emissions and waste. Last internal audit conducted on 25.06.2024.</li> </ul> </li> </ul> |

### Summary of findings

| Code area | Workplace requirement | Local law | Finding     |
|-----------|-----------------------|-----------|-------------|
|           |                       |           | No findings |

**Systems and evidence examined to validate this code section**

- Through onsite inspection, interviews and document review, no violation of environment pollution was observed. The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties.
- Facility complies with relevant local and national laws regarding the use of water, energy and resources.
- Factory management has appointed a designated person Md. Sukur Ali-Manager (HR & Compliance) to take care about environmental requirement.
- Production process of the factory is Cutting, Sewing, Finishing & Packing. No Hazardous types of chemicals are used in the factory. Only Spot Lifter 833 uses for Spot removing work. Factory management has conducted training on minimal uses of water, energy and natural resource to all employees.
- Factory management has the agreement with waste collect company for the disposal of general wastages like jute, fabrics, poly, wastage cartons, papers etc. Factory management is aware about the environmental impact of their business activities.

**Evidence examined:**

Environmental policy and procedure, training record, waste disposal agreement, different types of records for energy and water consumption, license, chemical inventory etc.

---

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?

Not Applicable

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No

## 10.B. Environment 4-Pillar

### Summary of findings

| Code area                  | Workplace requirement                            | Local law | Finding                         |
|----------------------------|--|-----------|---------------------------------|
| 10.B. Environment 4-Pillar | 10.B.H Record energy use, water use, solid wa... | §1        | NC <a href="#">ZAF600692473</a> |

#### Systems and evidence examined to validate this code section

The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties and its own suppliers.

- Main production process of the factory is Cutting, Sewing, Finishing & Packing.
- Factory management has appointed a designated person Md. Sukur Ali-Manager (HR & Compliance) to take care about environmental requirement.
- Factory management has conducted training on minimal uses of water, energy and natural resource to all employees.
- Factory management has the agreement with waste collect company for the disposal of general wastages like wastage fabrics, poly, cartons etc. Factory management is aware about the environmental impact of their business activities.

Evidence examined:  
 Environmental policy and procedure, training record, waste disposal agreement, different types of records for energy and water consumption, license, chemical inventory etc.

# Findings: non-compliances

ZAF600692473

Non-compliance

Due 2024-02-07

## Code area

10.B Environment 4-Pillar

## Status

Open\*

## Workplace requirement

10.B.H Record energy use, water use, solid waste, material use, hazardous substance use and waste, and effluent discharge.

## Time given to resolve

30 days

## Issue title

621 - No/inadequate systems or records for hazardous substances (e.g. chemicals and pesticides) use

## Verification method

Desktop audit

## Description

During plant tour, it was observed that the facility has a designated wastage area, but they have stored various types of waste materials, including poly, jute, cartons, papers without proper segregation. These items are located in the wastage building-4.

## Area of non-compliance/non-conformance

Local law

## Description (carried over)

During plant tour, it was observed that the facility has a designated wastage area, but they have stored various types of waste materials, including poly, jute, cartons, papers without proper segregation. These items are located in the wastage building-4.

## Corrective and preventative actions

It is recommended that the facility management shall ensure to keep all wastage by the properly segregated way at the wastage area.

## Corrective and preventative actions (carried over)

It is recommended that the facility management shall ensure to keep all wastage by the properly segregated way at the wastage area.

## Local law reference

In accordance with The Bangladesh labour Laws, 2006, section 54: Effective arrangements shall be taken in every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.

## Evidence



[Wastes were not segregated- 02.JPG](#)



[Wastes were not segregated- 01.JPG](#)



\* PDF generated at 06:35 (UTC) on 30 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

## 10.B. Environment 4-Pillar

### Data points

|  |  |
|--|--|
| Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?   | Yes  |
| What additional specific environmental policies does the site capture?   | Packaging optimization<br>Prioritising local suppliers<br>Responsible use and management of water<br>Biodiversity and eco system impact management   |
| Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?   | Yes<br><br>Facility has system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.  |
| Does the site have reduction targets in place to manage climate related risks?   | None   |
| Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?   | Yes<br><br>Facility has set up target for electricity and diesel use. Different types of records for energy include continuous recording and regular reviews of use and discharge of natural resources e.g., energy use. |
| Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility? | Yes<br><br>Facility Checked the waste collector Licenses.  |

### Usage/discharge analysis

|  | Last full calendar year (2023) | Previous full calendar year (2022) |
|--|--------------------------------|------------------------------------|
| Total electricity consumption from non-renewable sources (kWh) | 2,994,889                      | 2,835,982                          |
| Total electricity consumption from renewable sources (kWh)     | 0                              | 0                                  |
| Sources of renewable energy used                               | None                           | None                               |

| Types of renewable energy used                        | Other (provide details)<br>No renewable energy used | Other (provide details)<br>No renewable energy used |
|---|---|---|
| Total natural gas consumption (kWh)                   | 0   | 0   |
| Usage of other purchased fuels                        | Diesel 151220 Ltr.                                  | Diesel 14598 Ltr.                                   |
| Has the site completed any carbon footprint analysis? | No  | No  |
| Water sources   | Ground Water  | Ground Water  |
| Does the site use mercury or mercury compounds?       | No  | No  |
| Water volume used (m3)                                | 1,234.5   | 1,185.2   |
| Water discharged                                      | Local Drainage                                      | Local Drainage                                      |
| Water volume discharged (m3)                          | 850   | 780   |
| Water volume recycled (m3)                            | 0   | 0   |
| Total waste produced (mt)                             | 60  | 59  |
| Total hazardous waste produced (mt)                   | 0.5   | 0.4   |
| Waste to recycling (mt)                               | 0   | 0   |
| Waste to landfill (mt)                                | 0   | 0   |
| Waste to other (mt)                                   | 59.5  | 58.6  |
| Total product produced (mt)                           | 89.3  | 83.6  |

## 10.C. Business ethics

### Management systems

|  |   |
|--|---|
| Develop and maintain relevant policies and procedures to ensure workplace requirements are met                             | Robust Management Systems   |
| Appoint a manager with sufficient seniority who is responsible for implementing procedures                                 | Robust Management Systems   |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems   |
| Monitor the effectiveness of procedures to meet policy and workplace requirements  | Robust Management Systems   |
| Explanation for management systems grades  | <ul style="list-style-type: none"> <li>• Clear Environmental Policy: <ul style="list-style-type: none"> <li>• The factory has a written policy to reduce environmental impact, including waste management, energy use, and emissions control.</li> </ul> </li> <li>• Regulatory Compliance: <ul style="list-style-type: none"> <li>• The factory follows all environmental laws and regulations, including permits and reporting requirements.</li> </ul> </li> <li>• Responsible Person: <ul style="list-style-type: none"> <li>• Md. Sukur Ali-Manager (HR &amp; Compliance) is responsible for monitor the Environmental related issues.</li> </ul> </li> <li>• Employee Training: <ul style="list-style-type: none"> <li>• Workers are trained on environmental practices and their role in minimizing environmental impact. Last ETI base Code training conducted on 07.10.2024 where this code area was included in the training.</li> </ul> </li> <li>• Regular Monitoring: <ul style="list-style-type: none"> <li>• The factory regularly monitors its environmental impact and performance, including emissions and waste. Last internal audit conducted on 25.06.2024.</li> </ul> </li> </ul> |

### Summary of findings

| Code area | Workplace requirement | Local law | Finding     |
|-----------|-----------------------|-----------|-------------|
|           |                       |           | No findings |

**Systems and evidence examined to validate this code section**

- The company established a business ethics policy to communicate both externally and internally and provide training on business ethics.
- Md. Sukur Ali-Manager (HR & Compliance) was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
- The company established a business ethics policy to communicate both externally and internally and provide training on business ethics.
- There is an internal grievance process on site.

**Evidence examined:**

- The company business ethics policy including Bribery Corruption
  - Training records
  - Worker handbook
  - Reports from Anonymous email account
  - Management interview
  - Worker interview
-

## 10.C. Business ethics

### Data points

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

No

Provide any certified anti-bribery management systems for the site

Site doesn't have any anti-bribery management system.

## Attachments



[All Training File\\_Platinum.pdf](#)



[Building Description PAMCO.pdf](#)



[PAMCO License.pdf](#)



[PC Committee\\_Platinum.pdf](#)



[Policy Platinum Apparel.pdf](#)



[Signed CAPR-PAMCO.pdf](#)



[GSCSF75-Photoframe for Social\\_Platinum.pdf](#)





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