

# Sedex Members Ethical Trade Audit Report

## Version 6.1



Audit Details							
Sedex Company Reference: (only available on Sedex System)	ZC5000035025		Sedex Site Re (only available of	eference: n Sedex System)		ZS1000040996	
Business name (Company name):	IDEAL (PVT) LTD						
Site name:	IDEAL (PVT) LTD						
Site address:	Ideal Center, A-18, 19 Block 7 & 8 K.C.H.S.U KARACHI 75350 PK		Country:		РК		
Site contact and job title:	Muhammad Essa Is	mail. /	HR MANAGER	8			
Site phone:	0213454244		Site e-mail:		fawadijazkhan@hotmail. com		
SMETA Audit Pillars:	Labour Standards		Health and Safety (plus Environment 2-Pillar)	Enviror 4-pillar		Business Ethics	
Date of Audit:	2024-07-10						

Audit Company Name:
Intertek Pakistan

Audit Conducted By						
Affiliate Audit Company	$\checkmark$	Purchaser		Retailer		
Brand owner		NGO		Trade Union		
Multi- stakeholder			Combined Audit (select all that apply)			

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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 Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

#### 2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Universal rights covering UNGP
  - Management systems and code implementation,
  - Responsible Recruitment
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

#### **4-Pillar SMETA**

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



## **SMETA Declaration**

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

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

Auditor Team						
Lead Auditor:	Adil Khalil	APSCA Number:	21704930			
Additional Auditors:						
Date of declaration:	2024-07-12					

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

Site Representation				
Full Name:	Muhammad Essa Ismail.			
Title:	HR MANAGER			
Date of declaration:	2024-07-12			
	must be recorded here (e.g. different sample size): s from the past 5 months were provided for review (5 months only since the operation for digital thermometer just			

Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed

The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives

Nil





## Summary of Findings

Issue	Area of Non–Conformity		Nur	nber of iss	sues	Findings
<i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
<u>OB - Management Systems and code</u> implementation			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1	§1 §2	3	0	0	NC - ZAF600565671 NC - ZAF600565672 NC - ZAF600565673
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
<u>9 - No harsh or inhumane treatment is</u> <u>allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
10B2 - Environment 2–pillar			0	0	0	
10B4 - Environment 4–pillar	10.B4.1	§3	1	0	0	NC - ZAF600565674
10C - Business ethics 4-pillar			0	0	0	

#### Local Law Issues

Issue	Description
§1	In accordance with the Sindh Factories Rules 2015 section 3, 30. (1) In every factory the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the parts of machinery required to be fenced are in motion or in use, namely – (a) every moving part of a prime mover, and every fly wheel connected to a prime mover.
§2	In accordance with THE SINDH FACTORIES ACT, 2015. SINDH ACT NO. XIII OF 2016. Chapter-3 Health and Safety: Section 18,Dust and Fumes: (1) In every factory in which, by reason of the manufacturing process carried on, there is given off any dust or fume or other impurity of such a nature and to such an extent as is likely to be injurious or offensive to the workers employed therein, effective measures shall be taken to prevent its accumulation in any work-room and its inhalation by workers and if any exhaust appliance is necessary for this purpose, it shall be applied as near as possible to the point of origin of the dust, fume or other impurity, and such point shall be enclosed so far as possible.



§3	CATEGORY B: In accordance with the Environmental Protection act 1997 S.R.O. 528(1)/2001 Category "B" Industrial units: An industrial unit in category "B" shall submit Environmental Monitoring Reports on quarterly basis.
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### **Site Details**

Site Details						
Company Name	IDEAL (PVT) LTD					
Site Name	IDEAL (PVT) LTD					
GPS location (if available)	GPS Address: A-19, Block 7-8 K.C.H.S.U Lt Karachi					
	Coordinates:	24.871068394601807, 67.08076520951732				
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Karachi Chamber of Commerce Valid till 31 March 2025, NTN (0804020), Labor Certificate (No. 54/31, No expiry))					
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Cut to pack facility of leather jackets and pants.					
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Facility Ideal Pvt. Limited is situated at A-19, Block 7-8, K.C.H. S.U Ltd Karachi. Facility is ground plus six story building in a commercial marker. Ground floor has Office, reception and show room. First floor has pattern making and cutting, Second floor has accessory store, fusing, pattern office and lining cutting along with sample department. Third floor has Finishing, spray and packing. Fourth floor has stitching section. Fifth floor has Bag section which was closed due to no order in that section. Sixth floor has dinning area and rest area. Facility is cut to pack unit of leather jackets, pants and bags. There is no wet processing is carried out in this facility. Facility purchases the finished leather.					



Structure and number of buildings	Building Name:		1				
	Floor	Description	n	Remark			
	Ground	Office, rec and show	ception room	Nil			
	First	pattern m cutting, se floor has a store, fusi pattern of lining cutt with samp departme	accessory ing, ffice and ing along ble	Nil			
	Second	has accessory store, fusing, pattern office and lining cutting along with sample department.		Nil			
	Third	Finishing, and packi	spray ng	Nil			
	Fourth	Stitching s	section	Nil			
	Fifth	Bag sectio	on	Nil			
	Sixth dinning area and rest area		rea and	Nil			
Visible structural integrity issues (large cracks) observed?	□ Yes ☑ No						
	Please give details:						
	No cracks were foun	d in the bui	ilding.				
Does the site have a structural engineer evaluation?	🗹 Yes 🗆 No						
	Please give details:						
	Facility has building stability form K From Engr. Badrus Saleem Baig PEC No 1008						
Site function	🗆 Agent		Factor Proces	ry ssing/Manufacturer			
	Finished Product	Supplier	□ Growe	er			
	🗆 Homeworker		🗆 Labou	ır Provider			
	Pack house		🗆 Prima	ry Producer			
	Service Provider		🗆 Sub-co	ontractor			
Months of peak season	April to July						
Process overview	Faiclity is cut to pack	unit leathe	er jackets, p	ants and bags.			
What form of worker representation is there on site?				er Committee			
	Other      None						
Please give details:	There is no union in the facility.						
Is there any night production work at the site?	🗆 Yes 🗹 No						

 Start Date:
 End Date:

 2024-07-10
 2024-07-12

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Are there any on site provided worker accommodation buildings	<ul> <li>□ Yes ☑ No</li> <li>Please give details:</li> </ul>
Are there any off site provided worker accommodation buildings	<ul> <li>□ Yes ☑ No</li> <li>Please give details:</li> </ul>
Were all site provided accommodation buildings included in this audit	<ul> <li>□ Yes ☑ No</li> <li>Please give details:</li> <li>No accommodation is provided.</li> </ul>



Audit Pa	rameters					
Time in and time out	Day 1		Day 2		Day 3	
	In 09:30		In	09:30	In	09:30
	Out	17:30	Out	17:30	Out	15:00
Audit type:	FULL_INITIAL					
Was the audit announced?	ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	o No					
Who signed and agreed CAPR	Muhammad Essa Ismail. / HR MANAGER					
Is further information available	No					



Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no union in the facility.		
Reason for absence during the audit	There is no union in the facility.		
Reason for absence at the closing meeting	There is no union in the facility.		





## Worker Analysis

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

	Worker Analysis							
	Local		Migrant*		Home			
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	173	0	0	0	0	0	0	173
Worker numbers – female	4	0	0	0	0	0	0	4
Total	177	0	0	0	0	0	0	177
Number of Workers interviewed – male	24	0	0	0	0	0	0	24
Number of Workers interviewed – female	2	0	0	0	0	0	0	2
Total – interviewed sample size	26	0	0	0	0	0	0	26



	Nationalities Structure	
Nationality of Management	Pakistani	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Pakistani	approx %: 100%
Was this list completed during peak season?	☑ Yes □ No Please give details:	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	Only monthly payment.





Worker Interview Summary		
Were workers aware of the audit?	🗹 Yes 🗆 No	
Were workers aware of the code?	🗹 Yes 🗆 No	
Number of group interviews:	4 groups of 5	
Number of individual interviews:	Male: 4 Female: 2	
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<ul> <li>✓ Yes □ No</li> <li>Please give details:</li> </ul>	
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No	
In general, what was the attitude of the workers towards their workplace?	🗹 Favorable 🛛 Non-favourable 🗆 Indifferent	
What was the most common worker complaint?	No complain was noted from the workers.	
What did the workers like the most about working at this site?	On time payment and good behavior of the management.	
Any additional comment(s) regarding interviews:	Nil	
Attitude of workers to hours worked:	Satisfied. Daily normal working time was 8 hours and overtime is voluntarily. Overtime hours are within legal limits of 2 hours a day and 12 hours a week.	
Is there any worker survey information available?	□ Yes ☑ No Please give details:	





#### Attitude of workers:

Cooperative attitude were observed during the interview process, Workers confirmed that no discrimination is practice in the company. Regular health and safety trainings are conducted to create awareness about the workers safety. Workers confirmed that no Child labour is employed. Workers received wages before 07th day of every month and were satisfied with the benefits provided by company. Workers confirmed that company pay salaries on time and no illegal deduction are made in the factory. Worker confirmed that attitude of management is very much positive and management take care of workers very much. Workers confirmed that they have participated in election process. Workers were aware about the safety procedures. They told that trainings are regularly imparted. Bonus was paid to them. No accidents in last 6 months. Over time is done occasionally. Maximum 2 hours in a day and 12 hour in a week. Double wages of overtime paid, if done. No illegal deductions were not made There is no disparity in providing training. Leave wages are paid along with bonus. Weekly off given after 6 working days.

#### Attitude of worker's committee/union reps:

They confirmed that they are free to conduct meeting with members and workers. They confirmed that no discrimination is practiced with them in facility. they were satisfied with the working environment. Regular meetings are held and the grievances are taken care of by the management.

#### Attitude of managers:

The facility management was very receptive and showed a positive attitude towards the audit. All documents were provided on timely manner. At the end of the audit, all the non-compliances were accepted by the facility. The management demonstrated a willingness to improve all issues found during the audit. Factory provided full access.





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

0A: Compliance Requirements

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

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

#### **Current Systems and Evidence Examined**

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

#### Current Systems:

Facility has human rights policy and training given to all employees on the need to protect human rights.

Facility has designated person responsible for implementing standards concerning Human rights. Suggestion and complaint boxes are mounted at several locations within the facility for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

**Evidence examined:** 

Human rights policy Employee training records Worker interviews

Any other comments:

Nil

Policy statement that expresses commitment to respect human rights?	<ul> <li>Yes  D No</li> <li>Please give details:</li> <li>Facility has written human right policy and procedure.</li> </ul>
Are the policies included in workers'	✓ Yes □ No
manuals?	
	Please give details:
	Policies are included in workers manual.
Does the business have a designated	🗹 Yes 🗆 No
Does the business have a designated person responsible for implementing standards concerning Human Rights?	Please give details:
	Facility has a designated person responsible for implementing standards concerning human rights.





system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	es 🗆 No se give details:
reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	se aive details:
the reporter?	se give details.
Тер	lity has a transparent system in place for confidentially orting and dealing with human rights.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	es 🗆 No
Does the business demonstrate effective data privacy procedures for workers'	es 🗆 No
	se give details:
	ional data confidentiality clause found written on workers loyment contract.
Measuri	ng Workplace Impact
Annual worker turnover(Number of Last	year 2.0%
workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	year 1.0%
Current % quarterly (90 days)1.09turnover(Number of workers leaving from the first of the 90 day period1.09through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])1.09	ό
	year 3.0%
lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	year 4.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)2.09	ó
Are accidents recorded?	es 🗆 No
Plea	se give details:
illne	ss injury log sheet maintained.
	year 2.0%
accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	year 3.0%

Start Date:End Date:2024-07-102024-07-12



Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	2.0%	
Lost day work cases per 100	Last year	0.0%
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	20.0%
	12 month	30.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%





#### 0B - Management Systems and code Implementation [Summary of Findings]

0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees. 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with. 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

#### **Current Systems and Evidence Examined**

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

#### Current Systems:

Muhammad Essa ( Manager HR & Admin) is responsible to implement ETI base codes also has a good knowledge about the local labour laws as well as the issues related to ILO convention is assisting the Company for implementing the ETI Base Codes and relevant local laws.

The company for implementing the ETI Base Codes and relevant local laws. The company has copies of laws and regulations; books are maintained. The Facility seeks Regulatory updates relating to workers and workplace from labour department, updates relating to the Environmental regulation from Punjab EPA and Public Works Dept, Punjab. ETI code of conduct is displayed at various locations in the factory. ETI code of conduct has been communicated to its supplier and supply chains through courier.

Company also conducted Management review for 2024 to monitor the performance of company

regarding social compliance and ETI.

Company also conducted internal audits for 2024 to improve the management system.

#### Evidence examined:

1. Social Compliance Manual ref # JBL / ETI / 2018.

- 2. Social Policy
- 3. Employees Handbook
- 4. Training records of ETI to workers.
- 5. Display of ETI code of conduct.
- 6. Orientation training records for April 2024.

#### Any other comments:

Nil

	Management Systems
In the last 12 months, has the site been subject to any fines/prosecutions for	🗆 Yes 🗵 No
non-compliance to any regulations?	Please give details:
	Factory did not subjected to any fines/prosecutions during last 12 months according to management interviews and documents review.
Do policies and/or procedures exist that reduce the risk of forced labour, child	🗹 Yes 🗆 No
labour, discrimination, harassment & abuse?	Please give details:
abuse?	The facility has its own policies and procedures on forced labor, child labor, discrimination, harassment & abuse and the facility conducts training to the workers on legal requirements and ETI base code requirements.





If Yes, is there evidence (an indication) of effective implementation? Please give details.	On the day of assessment, no traces of forced labor, child labor, discrimination, harassment & abuse was observed. All interviewed employees reported that they are treated with dignity and respect.
Have managers and workers received	🗹 Yes 🗆 No
training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Please give details:
	Workers were provided training by Manager HR and HSE for social responsibilities, legal rights and national and international social compliance norms and ethic practices. Training record was available. Training schedule is established and implemented.
If Yes, is there evidence (an indication)	🗹 Yes 🗆 No
that training has been effective e.g. training records etc.? Please give details	Please give details:
	Training Effectiveness was assessed by interviewing workers and was well understood by the workers
Does the site have any internationally	🗆 Yes 🗵 No
recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or	Please give details:
other social audits)?	No such certification.
Is there a Human Resources	🗹 Yes 🗆 No
manager/department?	Mr. Essa Ismail
Is there a senior person /manager responsible for implementation of the	🗹 Yes 🗆 No
code?	Please give details:
	Mr. Essa Ismail
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No
	Please give details:
	All workers information was provided in their personal files which remain confidential and only accessed by HR Manager.
Is there an effective procedure to ensure confidential information is kept	🗹 Yes 🗆 No
confidential?	Please give details:
	HR department kept all personal data.
Are risk assessments conducted to	🗹 Yes 🗆 No
evaluate policy and procedure effectiveness?	Please give details:
	Risk assessment was conducted by the teams from top to operational level.
Does the facility have a process to address issues found when conducting risk assessments, including	🗹 Yes 🗆 No
	Please give details:
implementation of controls to reduce identified risks?	Facility has its code for implementation for supplier.
Does the facility have a policy/code which	🗹 Yes 🗆 No
require labour standards of its own suppliers?	Please give details:
	Facility owned this land.





Land Rights		
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	✓ Yes □ No	
SMETA Measurement Criteria):	Please give details:	
	Facility follows Factories act 2015	
Does the site have systems in place to conduct legal due diligence to recognize	🗹 Yes 🗆 No	
conduct legal due diligence to recognize and apply national laws and practices	Please give details:	
relating to land title?	Facility own this land.	
Does the site have a written policy and procedures specific to land rights?	🗆 Yes 🗵 No	
	Please give details:	
	Facility own this land.	
Is there evidence that facility/site compensated the owner/lessor for the	🗆 Yes 🗵 No	
land prior to the facility being built or	Please give details:	
expanded?	Facility own this land.	
Does the facility demonstrate that alternatives to a specific land acquisition	🗹 Yes 🗆 No	
were considered to avoid or minimize	Please give details:	
adverse impacts?	Facility own this land. This land is in a commercial area.	
Is there any evidence of illegal appropriation of land for facility building	🗆 Yes 🗵 No	
or expansion of footprint?	Please give details:	
	No illegal expansion.	





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

1: Compliance Requirements

1.1 There is no forced, bonded or involuntary prison labour.1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

Factory has established, documented, maintained, and effectively communicated forced labor policy and procedure. As per policy, facility sternly discourages forced labor all company's policies and procedures are very much compatible to the consent and free movement of the employees. Workers are not required to lodge "deposit" any kind of their (educational certificate), identity papers or any other personal belongings with the employer and are free to leave the company after reasonable notice. No prison labor was found working during facility visit. Policy was communicated to the workers through notices, worker's handbook and orientation and in biannually awareness training sessions. Facility allows employees to move freely within their designated work areas during work hours, including access to drinking water and toilet facilities. Employees can leave the facility during extended meal periods or after work hours confirmed during 26 worker interviews. Facility has assigned qualified person with responsibility for communicating, training, deploying, and monitoring and ensuring the implementation of forced labor policy and procedure. Through workers interview it was confirmed that workers are free to leave factory at the end of their work shift, also workers can resign with one-month notice or salary in lieu. No sign of force labour was found in the factory during worker's interview, documents review, and facility visit. Factory has also communicated the policy to all its suppliers and contractor's records of acknowledgment reviewed during audit. Employment contract was found in accordance with local law and in native language which was found maintained at worker's personal files. No such long-term loan scheme is in practice which restricts employees from leaving the facility. Overtime working is on voluntary basis worker can deny overtime working without any repercussions. Facility is only retaining National identity cards and education certificate copies in employee's personal files no original documents are being retained as a condition of employment. Evidence examined: Personnel files Resignation records Factory rules Employee handbook Management and worker interview Any other comments: Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	□ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<ul> <li>□ Yes ☑ No</li> <li>Please give details:</li> </ul>



Is there any evidence of retention of wages / deposits (If yes, please give	🗆 Yes 🗹 No
wages / deposits (If yes, please give details and category of workers affected)	Please give details:
Are there any restrictions on workers' freedom to terminate employment?	🗆 Yes 🗵 No
	Please give details:
	Both parties can terminate the employment on one month notice period that is legal.
If any part of the business is UK based or registered there & has a turnover over	🗆 Yes 🗆 No 🗵 Not Applicable
£36m, is there a published a 'modern day	Please give details:
slavery statement?	No such business.
Is there evidence of any restrictions on workers' freedoms to leave the site at the	🗆 Yes 🗵 No
end of the work day?	Please give details:
	Workers can leave the site at the end of working hours.
Does the site understand the risks of forced / trafficked / bonded labour in its	🗹 Yes 🗆 No 🗆 Not Applicable
supply chain	Please give details:
	Facility understands the risk of forced, trafficked, or bonded.
Is the site taking any steps taking to reduce the risk of forced / trafficked	☑ Yes □ No
labour?	Please give details:
	Policy and procedures exist and communicated all concerned personnel.





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

2: Compliance Requirements

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

#### **Current Systems and Evidence Examined**

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

**Current Systems:** 

Based on interview with the workers, management and document review, the employees could freely resign with proper notification in advance 30 days minimum.

The employees obtained their job by themselves by seeing advertisement or by recommendation from existing employee; they were not asking or forced to lodge deposits or their identity papers to the factory at time of employment.

No bonded or involuntary prison labor identified. Workers were free to leave at the end of the of factory timing as per local law.

Evidence examined:

Social Compliance Manual. Checked personnel files of the 26 employees and terms and conditions. Attendance records for months of June 2023, January 2024 & July 2024. Self-Declaration form in personnel file Hiring Contracts.

Any other comments:

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<ul><li>Union</li><li>Other</li></ul>		Worker Committee None	
Other details:	Facility has workers. committee			
Is it a legal requirement to have a union?	🗆 Yes 🗵 No			
Is it a legal requirement to have a worker's committee?	☑ Yes □ No			
Is there any other form of effective worker/management communication channel? (Other than union/worker	<ul><li>☑ Yes □ No</li><li>Please give details:</li></ul>			
committee e.g. H&S, sexual harassment)	Suggestion box.			
Is there evidence of free elections?	🗆 Yes 🗹 No			

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Does the supplier provide adequate facilities to allow the Union or committee	🗆 Yes 🗹 No					
to conduct related business?	Please give details:					
	No union in the facility.					
Name of union and union representative, if applicable:	None					
Is there evidence of free elections?	🗆 Yes 🗆 No 🗵 Not Applicable					
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Facility has work council					
Is there evidence of free elections?	🗹 Yes 🗆 No 🗆 Not Applicable					
Are all workers aware of who their representatives are?	🗹 Yes 🗆 No					
	Please give details:					
	Workers are aware of their representative.					
Were worker representatives freely elected?	🗹 Yes 🗆 No					
Date of last election:	2024-02-24					
Do workers know what topics can be raised with their representatives?	🗹 Yes 🗆 No					
Were worker representatives/union representatives interviewed?	🗹 Yes 🗆 No					
If Yes, please state how many:	1.0					
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Last committee meeting was held in March 2024					
Are any workers covered by Collective Bargaining Agreement (CBA)?	□ Yes 🗵 No					



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

3: Compliance Requirements

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be

repeated for new or reassigned workers.

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

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

#### Current Systems and Evidence Examined

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

#### **Current Systems:**

It was verified during the audit that facility has the appropriate Health & Safety Management System, the company has established procedures for Health & Safety and provides safe working environment for all its workers and to eliminate all potential hazards that can cause work related accidents.

The facility has systematized mechanism to detect potential risk and hazards associated with the job or present in the work environment which could cause harm/ injury to the workers. The facility provides necessary personal protective equipment for the worker safety. The facility has ensured to provide First Aid assistance to workers and arrange trainings on emergency first aids and fire fighting with intervals. All the workers have been trained on ETI Base Codes, which include requirement on Health and Safety. Training records have been verified for the same and trained by the local labor department through professional management for fire safety and first aid. Company has developed a safety committee to perform the

function of fire safety and first aid. Announced and un announced mock drills are conducted and Photographs were taken during the training programs conducted at the company premises the same were also verified during the audit.

In case of emergency and for evacuation during fire, a drill was also conducted in order that employees are made aware of actions during fire accidents, records for the same are maintained which has been verified during the audit.

The observations made indicated that workers are aware of the actions to be taken during emergency situations. Fire drill is held bi annually in which every employee take part and the health & safety officer keeps proper record for this practice. Posters on safety and occupational health issues were also found displayed near the working areas to disseminate information on health and safety related issues. Medical certificates of workers were checked at random from all levels of workers in the company and were found to be in order.

Hygiene Card of each employee was also found documented within their files.

Clean drinking water has been made available at identified locations in the company and is easily accessible. It was also found that a water filtration system is installed on each cooler for cleaning and sterilization of water. A water testing report was also found, the test was carried out by the reputable laboratory the results was verified for total dissolved salts and microbial properties and it was found satisfactory.

The area where drinking water is made available was found to be safe (hygienic and clean). Management Representative is responsible for communicating, deploying and monitoring Health & Safety policies and practices and ensures compliance to the legal requirements.

Evidence examined:





Risk Assessment Fire Drill Record Fire safety arrangement certificate from Civil Defence Fire fighter training records Fire Extinguishers Inspection Electrical safety report Drinking Water Test Building stability form Building Approved Map Health and safety Committee meeting First aid training certificate Illuminating Exit Sign and Emergency Lights Inspection Illness and injury records maintained for July 2023

Any other comments:

Nil

Does the facility have general and occupational Health & Safety policies and	🗹 Yes 🗆 No		
procedures that are fit for purpose and are these communicated to workers?	Please give details:		
are these communicated to workers?	Safety Policy, Emergency situation handling policy, Fire safety Plans and display of boards. Policies were communicated through training and posters in facility.		
Are the policies included in workers' manuals?	🗹 Yes 🗆 No		
	Please give details:		
	company has established Social Compliance Management system manual		
Are there any structural additions without required permits/inspections	🗆 Yes 🗵 No		
(e.g. floors added)?	Please give details:		
	No additional floor.		
Are visitors to the site informed on H&S and provided with personal protective	🗹 Yes 🗆 No		
equipment?	Please give details:		
	Visitors are provided with the safety gadgets.		
Is a medical room or medical facility provided for workers?(This section is to	🗹 Yes 🗆 No		
list evidence to support system	Please give details:		
description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	First aid box provided with trained first aiders.		
Is there a doctor or nurse on site or there	🗹 Yes 🗆 No		
is easy access to first aider/ trained medical aid?			
	Please give details:		
	First aid box provided with 2 trained first aiders.		
Where the facility provides worker transport – is it fit for purpose, safe,	🗆 Yes 🗹 No		
maintained and operated by competent persons e.g. buses and other vehicles?	Please give details:		
persons e.g. buses and other vehicles:	No transport is provided.		



Is secure personal storage space provided for workers in their living space and is fit for purpose?	□ Yes ☑ No Please give details:
	No accommodation is provided.
Are H&S Risk assessments are conducted (including evaluating the arrangements	🗹 Yes 🗆 No
for workers doing overtime e.g. driving after a long shift) and are there controls	Please give details:
to reduce identified risk?	Risk assessment is done.
Is the site meeting its legal obligations	🗹 Yes 🗆 No
on environmental requirements including required permits for use and	Please give details:
disposal of natural resources?	Facility has environmental policy.
Is the site meeting its customer requirements on environmental	🗹 Yes 🗆 No
standards, including the use of banned	Please give details:
chemicals?	Company following SEPA Rule 2012.



	Non-Compli	iance		Evid	lence
[Back to findings	summary]				
	Non-Compli	iance		1	
Status	CLOSED				
Reference	ZAF600565671				
Clause	3 - Working Condition	ns are Safe a	and Hygienic		
Issue Title	187 - Fire extinguishe regularly / out of dat	ers not inspe e	ected / checked		
Subcategory	Fire Safety - Fire Figh	ting Equipm	nent		
New or carried over?	🗹 New	🗆 Ca	arried Over		
Resolved by audit	ZAA600076299				
Root cause	🗆 Training	⊡ Sy	/stem		
	🗆 Costs	🗆 La	ack of workers		
	🗆 Other				
Root cause - Other				Tur and the	
ETI code	3.1 - A safe and hygie be provided, bearing knowledge of the inc hazards. Adequate st accidents and injury associated with, or o by minimising, so far the causes of hazard environment.	in mind the lustry and o teps shall be to health ar ccurring in t as is reasor	e prevailing f any specific e taken to prevent ising out of, the course of work, nably practicable,	Dischar extingui	rged fire sher.jpeg
Explanation to the non compliance	Based on the facility extinguisher was fou and one on second fl	tour it was r nd discharg oor.	noted that one led on the the fourth		
Follow up method	🗆 Follow up audit		esktop audit		
Timescale	🗆 Immediate 🛛 🖂	30 days	🗆 60 days		
	□ 90 days □	120 days	🗆 180 days		
	🗆 365 days 🛛 🗆	Other			
Actions	Facility should check basis and charge all t	the fire exti the discharg	nguisher on regular Jed extinguishers.		
Additional comments	Facility has checked t basis and charge all t inspection of the exti records provided.	the dischard	jed extinguishers.		

 Start Date:
 End Date:

 2024-07-10
 2024-07-12



Non-Compliance					Evidence
[Back to findings	<u>summary]</u>			Т	
	Non-Compl	liance			
Status	CLOSED				
Reference	ZAF600565672				
Clause	3 - Working Conditio	ons are Safe ar	nd Hygienic		
Issue Title	264 - Machines lack a eye or needle guards hand guards on othe	s on sewina m	afety guards (e.g. nachines, belt /		
Subcategory	Machinery				
New or carried over?	🖂 New	🗆 Car	ried Over		
Resolved by audit	ZAA600076299				
Root cause	🗆 Training	🗆 Sys	tem		
	🗹 Costs	🗆 Lac	k of workers	X	
	🗆 Other			2	in the
Root cause - Other					
Local law issue	In accordance with th section 3, 30. (1) In e be securely fenced b construction which s parts of machinery re motion or in use, nar prime mover, and ev prime mover.	every factory tl by the safegua shall be kept ir equired to be mely – (a) even	he following shall rds of substantial n position while the fenced are in ry moving part of a	No	pulley cover.jpeg
ETI code	3.1 - A safe and hygie be provided, bearing knowledge of the inc hazards. Adequate si accidents and injury associated with, or o by minimising, so far the causes of hazard environment.	g in mind the p dustry and of teps shall be t to health aris occurring in th r as is reasona	orevailing any specific taken to prevent ing out of, e course of work, ably practicable,	<u>No</u>	cover on fan.jpeg
Explanation to the non compliance	Based on the facility stitching machines a was found without fe	and fans in spr	oted that 5% of ray departments		
Follow up method	Follow up audit Ø Desktop audit				
Timescale	🗆 Immediate 🛛 🖂	30 days	🗆 60 days		
	🗆 90 days 🛛 🗆	120 days	🗆 180 days		
	□ 365 days □	Other			
Actions	Facility should provid the rotating object th worker.				

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Additional comments

Facility has provided the protective covering to all the rotating object that can create a hazard to its worker. (Pully Cover, Needle Guard & Belt Cover) Facility has provided the pulley covers to all rotating devices. Pictorial evidence has been provided.



Non-Compliance					Evidence
[Back to findings	summary]				
	Non-Com	pliance		1	
Status	CLOSED				
Reference	ZAF600565673				
Clause	3 - Working Conditi	ions are Safe	and Hygienic		
Issue Title	280 - Personal Prot adequately cleaned	ective Equipn d / maintained	nent (PPE) not l / stored		
Subcategory	Personal Protective	e Equipment/	Clothing		
New or carried over?	🖸 New	□ C	arried Over		
Resolved by audit	ZAA600076299				
Root cause	🗆 Training	🗆 S	ystem		
	🗹 Costs	🗆 La	ack of workers		
	🗆 Other				
Root cause - Other					
Local law issue	and Safety: Section factory in which, by process carried on, fume or other impu an extent as is likel the workers emplo shall be taken to pr work-room and its exhaust appliance shall be applied as	IO. XIII OF 20 18,Dust and reason of th there is given urity of such a y to be injuric yed therein, e revent its accu inhalation by is necessary f near as possi fume or other	16. Chapter-3 Health Fumes: (1) In every e manufacturing n off any dust or nature and to such ous or offensive to effective measures umulation in any workers and if any or this purpose, it ble to the point of impurity, and such		In appropriate masks.jpeg
ETI code	be provided, bearing knowledge of the in hazards. Adequate accidents and injur	ng in mind the ndustry and c steps shall be y to health ar occurring in ar as is reaso	f any specific e taken to prevent ising out of, the course of work, nably practicable,		
Explanation to the non compliance	Based on the facility tour it was noted that inappropriate masks were provided in the spray section on third i.e only face masks instead of respirators.				
Follow up method	Follow up audit				
Timescale	🗆 Immediate 🛛	⊡ 30 days	🗆 60 days		

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	90 days	120 days	180 days	
	🗆 365 days	🗆 Other		
Actions	Facility should p section.	orovide appropriat	e PPEs in spray	
Additional comments	Facility has prov section. (Chemi Facility has prov working in fume	rided appropriate cal Filter Mask) rided the respirato es environment.	PPEs in spray or to the workers	





#### 4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

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

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

#### **Current Systems and Evidence Examined**

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

**Current Systems:** 

Factory has defined child labour policy and procedure. Factory has communicated the policy through notices and signs at main gate of the factory. No workers below 18 years are employed in the factory.

As per hiring procedure prospective workers with authentic age verification documents will be considered. HR department ascertains workers age during appointment through documents and interview, workers age verification documents were kept in their personal files for verification.

**Evidence examined:** 

Personnel files of all workers Latest list of employees Records of any health checks Age proof documents like CNIC, Birth certificates and educational certificates

Any other comments:

Nil

Legal age of employment:	14
Age of youngest worker found:	25
Are there children present on the work floor but not working at the time of audit?	□ Yes 🗹 No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<ul> <li>□ Yes ☑ No</li> <li>Please give details:</li> <li>No underage labor was observed.</li> </ul>





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

5: Compliance Requirements

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2 All workers shall be provided with written and understandable information about their employment

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

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

#### **Current Systems and Evidence Examined**

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

#### **Current Systems:**

The lowest wage paid as per the legal minimum compensation, that the wages were equivalent to the legally prescribed minimum wages i.e. Rs.32,000/- per month. This was done through review of time records and wages record at account office. In addition, the company has calculated the basic need wage. The wage need calculation is revised with regular intervals to take the effects of inflation. Records were checked on sample basis of male, female workers which also include production workers, packers, loader, supervisor, peon, security guards, quality checkers, and machine operators etc. The records were verified and found satisfactory. Wages are always paid through cash / bank transfer. Proof of wage disbursal is evidenced through the wage record and wage slips. The management retains a copy of wage sheet. The payroll slip includes details on employee name, wages paid and deduction details including signatures of employee and employer representative. During the interview, it was verified that all workers were aware of the wages they were entitled and also whether they were comfortable with the mode of payment. Awareness on the deduction on wages was also very good amongst the workers. Wage records were verified that the employer made no deductions from the wages. Only deduction of 1% EOBI, tax, advances or provident fund is deducted.

Overtime was observed during the period and paid double the ordinary rate.

Company allows paid leaves for sickness, injury, and maternity, in addition company is also paying group insurance and disablement benefits.

Evidence examined:

- 1. Payrolls records & Time records (for 26 employees) for July 2024, January 2024 & August 2023.
- 2. Production records (from work floors to check for discrepancies)
- 3. Leave records
- 4. EOBI contributions for July 2024, January 2024 & August 2023.
- 5. SESSI contribution for July 2024, January 2024 & August 2023.

6. Final settlement records

#### Any other comments:

Nil

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

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	1		1		
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: 12.0 Per Month: null	Actual Per Day: 2.0 Per Week: 10.0 Per Month: 40.0	NO		
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 32000	Actual Per Day: 1230.75 Per Week: 7384.6 Per Month: 32000	NO		
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: 12 Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO		
	Wages Analysis:				
Were accurate records shown at the first request?	🗹 Yes 🗆 No				
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 employees were selected from July 2024 (Current month) 26 employees were selected from January 2024 (Lean Month) 26 employees were selected from August 2023 (Random month)				
Are there different legal minimum wage grades? If Yes, please specify all.	🗆 Yes 🗵 No				
If there are different legal minimum grades, are all workers graded and paid correctly?	□ Yes □ No ☑ Not Applicable Please give details:				
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<ul> <li>□ Below legal min</li> <li>☑ Meet</li> <li>☑ Above</li> </ul>				
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	Lowest wage is 3200	0 per month.			
Please indicate the breakdown of workforce per earnings	40.0% of workforce e	arning under minimur earning minimum wag earning above minimu	ge		
Bonus Scheme found: Please specify details:	Bonus Scheme found:Facility pay 1 bonus each year to all the eligible employees. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.				
What deductions are required by law e.g. social insurance? Please state all types:	EOBI, SESSI Income tax.				
Have these deductions been made?	☑ Yes □ No				
Please list all deductions that have been made.	EOBI & SESSI				
Please list all deductions that have not been made.	None				
Were appropriate records available to verify hours of work and wages?	☑ Yes □ No				
Were any inconsistencies found? (if yes describe nature)	□ Yes ☑ No				

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Do records reflect all time worked? (For	🗹 Yes 🗆 No	
instance, are workers asked to attend meetings before or after work but not	Please give details:	
paid for their time)	Facility works only in general shi	ft from 9 a.m to 6 p.m.
Is there a defined living wage: This is not normally minimum legal	🗆 Yes 🗹 No	
wage. If answered yes, please state amount and source of info:	Please give details:	
Please see SMETA Best Practice Guidance and Measurement Criteria.		
If yes, what was the calculation method	ISEAL/Anker Benchmarks	Asia Floor Wage
used.	<ul> <li>Figures provided by Unions</li> </ul>	<ul> <li>Living Wage Foundation UK</li> </ul>
	🗆 🛛 Fair Wear Wage Ladder	Fairtrade Foundation
	Other – please give details:	
Are there periodic reviews of wages? If Yes give details (include whether there is	🗹 Yes 🗆 No	
consideration to basic needs of workers	Please give details:	
plus discretionary income).	Periodic wage review is done by	the local government.
Are workers paid in a timely manner in line with local law?	🗹 Yes 🗆 No	
Is there evidence that equal rates are	🗹 Yes 🗆 No	
being paid for equal work:	Please give details:	
	All employees are paid by their roll and expertise.	
How are workers paid:	☑ Cash	🗆 Cheque
	Bank Transfer	□ Other





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

6: Compliance Requirements

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

#### **Current Systems and Evidence Examined**

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

#### Current Systems:

The factory provided the attendance records for workers for review during the audit and auditor selected for months of June 2024, January 2024, and July 2023. 26 samples (24 male & 2female). The working hours in the factory were recorded through bar code scanning. Workers worked 8 hours per day, 6 days per week as normal working hours, overtime was performed on urgent business need basis. During record review 8 hours overtime was performed in week and 30 hours per month . The rest day is Sundays. The Maximum working hour per week was 52 hours per week.

Overtime was paid double the ordinary rate.

Evidence examined:

Attendance Records Overtime Records Production Records Personal Files Site Tour

Any other comments: nil

 Working hours' analysis

 Systems & Processes
 Biometric system.

 What timekeeping systems are used?
 Biometric system.

 Is sample size same as in wages section?
 ✓ Yes □ No

 Please give details:
 Please give details:





Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No
Are there any other types of contracts/employment agreements used?	□ Yes 🗹 No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	□ Yes 🗹 No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days
Is this allowed by local law?	☑ Yes □ No
Maximum number of days worked without a day off (in sample):	6
Stand	ard/Contracted Hours worked
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<ul> <li>□ Yes ☑ No</li> <li>% of workers:</li> <li>null%</li> <li>Frequency:</li> </ul>
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes 🗹 No
	Overtime Hours worked
Actual overtime hours worked in sample (State per day/week/month)	Maximum 12.5 hours in the month of June 2024. Maximum 11.5 hours in the month of January 2024. Maximum 12.5 hours in the month of July 2023
Combined hours (standard or contracted + overtime hours = total) over 60 found?	🗆 Yes 🖂 No
	Please give details:
	Per week working hour is maximum 54 week per was found.
Approximate percentage of total workers on highest overtime hours:	20.0%
Is overtime voluntary? (Please detail	☑ Yes  ☐ No  ☐ Conflicting Information
evidence e.g. Wording of contract / employment agreement / handbook /	Please give details:
worker interviews / refusal arrangements)	Overtime is voluntary
	Overtime premium



Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	✓ Yes □ No □ N/A – there is no legal requirement to OT premium	
Wages)	Please give details:	
	Overtime rate are double of the normal working wage as per law.	
Is overtime paid at a premium?	✓ Yes □ No Overtime rate are double of the normal working wage as per law.	
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<ul> <li>□ No</li> <li>□ Consolidated pay</li> <li>□ Collective Bargaining agreements</li> <li>☑ Other</li> </ul>	
Please give details	Overtime rate are double of the normal working wage as per law.	
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain	<ul> <li>□ Overtime is voluntary</li> <li>□ Onsite Collective bargaining allows 60+ hours/week is voluntary</li> <li>□ Safeguards are in place to protect worker's health and safety</li> </ul>	
any checked boxes above e.g. detail of consolidated pay / CBA or Other)	□ Site can	
Please give details	No working hours in a week exceed 60 hour.	
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	No working hours in a week exceed 60 hour.	
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	□ Yes ☑ No	
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☑ Yes □ No	





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

7: Compliance Requirements

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

## **Current Systems and Evidence Examined**

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

## Current Systems:

Factory has defined non-discrimination policy and procedure and as per policy is not engage in or support discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, or political affiliation.

During audit, through workers interview and documents review, no sign of discrimination was observed in the factory.

During audit, it was confirmed that facility's environment is free from misbehavior activities, such as gesture, language and physical contact that is sexually coercive, threatening, abusive or exploitative. Non-discrimination policy is found posted on employee notification boards at production floors. Factory has equal employment opportunity policy.

Factory has equal employment opportunity policy. Facility has appointed a senior person for communicating, training, deploying and monitoring and ensuring the implementation of non-discrimination policy and procedure.

Workers are hired, compensated & promoted based on capability and merit without any distinction, different social and ethnic background workers were found working in the factory.

Evidence examined:

The hiring and termination procedure leave application records and employee handbook. Payrolls Attendance records Termination records Training records

Any other comments:

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 99.0%		Female: 1.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	1 women at supervisor level.		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital	□ Hiring	Compensation	Access to training
status, sexual orientation, union membership or political affiliation?	□ Promotion	Termination or retirement	No evidence of discrimination found
Please give details	No discrimination was found.		
Professional Development			
What type of training and development are available for workers?	All workers are given Health and safety trainings		

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





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

8: Compliance Requirements

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

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no

real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

# **Current Systems and Evidence Examined**

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

## **Current Systems:**

During audit, it was noted that employment in the factory is based on recognized employment relationship established through national labor law & regulations. No casual and seasonal were found hired in the factory during document review, facility visit and workers interview.

No labor contractor / agency is in use, all workers are facilities employed

Evidence examined:

Hiring policy & procedure Worker interviews Personal file review Payroll & time records

Any other comments:

Nil

Responsible Recruitment					
All Workers					
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<ul> <li>Terms &amp; Conditions presented</li> <li>Same as actual conditions</li> </ul>	$\checkmark$	Understood by workers		
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	□ Yes ☑ No				
Migrant Workers					

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Type of work undertaken by migrant N workers:	No migrant workers are hired.		
agencies for migrant workers:	Jumber of (in country) recruitment agencies used: 0 Jumber of (outside of local country) recruitment agencies Ised: 0		
Are migrant workers' voluntary deductions (such as for remittances)	IYes ☑ No		
confirmed in writing by the worker and is P	lease give details:		
evidence of the transaction supplied by the facility to the worker?	lo migrant worker.		
Is there any observation on this finding? N	lo observation.		
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	]Yes ☑ No		
No	on-employee workers		
Recruitment Fees			
Are there any fees?	IYes ☑ No		
Agency Workers (if applicable) (Workers source by the agency. Usually the agencies are paid b	ed from a local agent who are not directly paid by the site, but paid by the site and the wages of the individual workers are paid by the agency.)		
Number of agencies used (average): 0			
Please provide the names of agencies if Applicable	lo agency is used for hiring.		
Were agency workers' age / pay / hours included within the scope of this audit?	2 Yes 🗆 No		
Were sufficient documents for agency workers available for review?	⊇ Yes 🗆 No		
Is there a legal contract agreement with all agencies?	]Yes ☑ No		
	lease give details:		
N	lo agency is used for hiring.		
Does the site have a system for checking labour standards of agencies?	] Yes 🗹 No		
	lease give details:		
N	lo agency is used for hiring.		
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)			
Any contractors on site?	IYes ☑ No		
P	lease give details:		
N	lo contractor is used.		
Do all contractor workers understand their terms of employment?	IYes ☑ No		
	lease give details:		





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

# 8A: Compliance Requirements

8.A.1 There should be no sub–contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

# **Current Systems and Evidence Examined**

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

# Current Systems:

Based on site tour and worker / management interviews, it was noted that facility purchases the leather from the third party subcontracts the dyeing process to Insaf Dying situated at Plot # 45 Mehran town Korangi. No other subcontract is of the production is done.

**Evidence examined:** 

Site tour (Calculation on total production and estimated capacity) Materials in/out records Management interview Worker interview

Any other comments:

Nil

Summary of sub-contracting - if applicable				
Is there any sub-contracting at this site?   Yes  No				
Summary of homeworking – if applicable				
Is homeworking used at this site? □ Yes ☑ No				





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

9: Compliance Requirements

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

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

## **Current Systems and Evidence Examined**

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

## Current Systems:

As Per the documentation, the factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.

As per management interview, document review and workers interview, there was a policy on Harsh Treatment which was communicated to all workers through awareness sessions and display at notice boards.

There is an internal process for grievance, workers can report any grievances (harassment, bullying, discrimination etc.) to joint worker council; any received complaint will be handled by management, without any reprisal for the worker in question

**Evidence examined:** 

The relevant policy on prevention of harassment and abuse Internal grievance procedure documentation. Training records

Any other comments:

Nil

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<ul> <li>Yes          No     </li> <li>Please give details:</li> <li>Complaint and suggestion boxes are mounted at different locations for grievance reporting</li> </ul>		
If yes, are workers aware of these channels and have access? Please give details.	Purpose of complaint and sugge workers.	Purpose of complaint and suggestion boxes is known to all workers.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Complaint and suggestion boxes		
Which of the following groups is there a	☑ Worker	Communities	
grievance mechanism in place for?	□ Suppliers	□ Other	
Please provide grievance mechanism details	Nil		
Are there any open disputes?	🗆 Yes 🗹 No		
	Please give details:		

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Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<ul> <li>✓ Yes □ No</li> <li>Please give details:</li> </ul>
Is there a published and transparent disciplinary procedure?	<ul><li>✓ Yes □ No</li><li>Please give details:</li></ul>
If yes, are workers aware of these the disciplinary procedure?	<ul><li>☑ Yes □ No</li><li>Please give details:</li></ul>
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	□ Yes ☑ No Please give details:





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

# 10A: Compliance Requirements

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

# **Current Systems and Evidence Examined**

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

Current Systems:

No migrant worker employed.

Evidence examined:

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

Any other comments:

None





#### 10B4 - Environment 4-Pillar [Summary of Findings]

10B4: Compliance Requirements

10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).

10.B4.7 Businesses shall make continuous improvements in their environmental performance. 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.

10B4: Guidance for Observations 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

# **Current Systems and Evidence Examined**

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

## **Current Systems:**

The factory management maintain required certificates including the registration form of environmental impacts of the construction, Approval of environmental impact assessment document and the environmental protection check and water showed the pollutant discharging was compliant with environmental law.

Based on observation on site, wastes were classified and collect environmental protection. Company has established Environmental policies and environmental management system. The facility has a proper practice to handle the waste of the facility. The overall cleaning condition of the facility is satisfactory. Company has established Environmental policies and environmental management system. The facility has a proper practice to handle the waste of the facility

## Evidence examined:

- 1. Environmental policy.
- 2. Environmental NOC
- 3. Energy bills 2023-2024
- 4. Water bill 2021-2022
- 5. Waste Records.
- 6. Waste Outward Gate pass
- 7. Aspect impact Analysis Reports
- 8. Stack emission report
- 9. Waste water test report

10. All legally required environmental documents were provided for review.

## Any other comments:

Nil

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Environmental Analysis		
Is there a manager responsible for Environmental issues (Name and Position):	Muhammad Essa (HR & Admin Manager)	
Has the site conducted a risk assessment on the environmental impact of the site,	☑ Yes □ No	
including implementation of controls to reduce identified risks?	Please give details:	
	Facility is a cut to pack unit of the leather garments.	
Does the site have a recognised environmental system certification such	🗆 Yes 🗹 No	
as ISO 14000 or equivalent?	Please give details:	
	No system certification is available.	
Does the site have an Environmental policy?	🗹 Yes 🗆 No	
If yes, is it publicly available?	🗹 Yes 🗆 No	
If yes, does it address the key impacts from their operations and their	🗹 Yes 🗆 No	
commitment to improvement?	Please give details:	
	No wet processing in the facility therefore no such impact was observed.	
Does the site have a Biodiversity policy?	🗹 Yes 🗆 No	
Is there any other sustainability systems present such as Chain of Custody, Forest	🗆 Yes 🗵 No	
Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	Please give details:	
	No such system is available.	
Have all legally required permits been shown?	🗹 Yes 🗆 No	
	Please give details:	
	Facility has approval from the environmental agency for its operations.	
Is there a documentation process to record hazardous chemicals used in the	🗆 Yes 🗆 No 🗵 Not Applicable	
manufacturing process?	Please give details:	
	No chemicals are used.	
Is there a system for managing client's requirements and legislation in the	🗆 Yes 🗹 No	
destination countries regarding environmental and chemical issues?	Please give details:	
	Not Applicable.	
Facility has reduction targets in place for environmental aspects e.g. water	🗹 Yes 🗆 No	
environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	Please give details:	
	Facility has target to reduce the electricity consumption by using LED lights and renewable energy.	





Facility has evidence of waste recycling and is monitoring volume of waste that is	<ul> <li>Yes</li></ul>		
recycled.			
Does the facility have a system in place	☑ Yes □ No		
for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that	Please give details:		
energy and natural resources that follows recognised protocols or	Facility is using meters for ener	gy usage and estimation for	
standards?	water use as no wet processing	is facility.	
Has the facility checked that any Sub- Contracting agencies or business	🗹 Yes 🗆 No		
partners operating on the premises have	Please give details:		
the appropriate permits and licences and are conducting business in line with	Facility has approval process fo	r the venders.	
environmental expectations of the facility?			
	Isage/discharge analysis		
Criteria	Previous year: 2023	Current year: 2024	
Electricity Usage: Kw/hrs	51655	25827	
Renewable Energy Usage: Kw/hrs	0	0	
Gas Energy Usage: Kw/hrs	69	33	
Has site completed any carbon Footprint Analysis?	No	No	
If Yes, please state result			
Water Sources	KWSB	KWSB	
Water Volume Used	514964	257482	
Water Discharged	Local drain	Local drain	
Water Volume Discharged	514964	257482	
Water Volume Recycled	0	0	
Total waste produced	453 kg	225	
Total hazardous waste produced	45 kg	0	
Waste to recycling	0	0	
Waste to landfill	0	0	
Waste to other	0	0	
Total Product Produced	5000	2700	

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	Evidence			
[Back to findings summary]				
Status	OPEN			
Reference	ZAF600565674			
Clause	10B4 - Environment 4–Pillar			
Issue Title	643 - GHG (Green House Gas) emissions not monitored as per legal requirements			
Subcategory	Air emissions & GHG (Green House Gas)			
New or carried over?	☑ New  □ Carried Over			
Root cause	🗆 Training 🔅 System			
	🗹 Costs 🛛 🗆 Lack of workers			
	🗆 Other			
Root cause - Other				
Local law issue	CATEGORY B: In accordance with the Environmental Protection act 1997 S.R.O. 528(1)/2001 Category "B" Industrial units: An industrial unit in category "B" shall submit Environmental Monitoring Reports on quarterly basis.			
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.			
Explanation to the non compliance	Based on the document review it was noted that facility is testing the emission of the generator on annual basis instead of quarterly basis as per law.			
Follow up method	🗆 Follow up audit 🛛 🗹 Desktop audit			
Timescale	□ Immediate   ☑ 30 days    □ 60 days			
	🗆 90 days 🛛 120 days 🖓 180 days			
	🗆 365 days 🛛 Other			
Actions	Facility should test the emission of the generator on quarterly basis.			

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#### 10C - Business Ethics – 4-Pillar Audit [Summary of Findings]

10C: Compliance Requirements

10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all

fiscal legislative requirements.

10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of

fraudulent Business Practice,

10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C: Guidance for Observations

10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been

implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

## Current Systems and Evidence Examined

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

## **Current Systems:**

Factory management representative on behalf of facility received the Business Practices Policy from auditor. Bribery and anti-corruption procedure and policy are documented and implemented. Manager support services is responsible to implement the Business Practices Procedure. Trainings on ethical Business Practices are arranged. Relevant staff has been trained on what action to take in the event of an arising in their area, which include requirement on ethical business practices. Training records have been verified for the same.

## Evidence examined:

Bribery and anti-corruption policy Communication record of policy Training records

Any other comments:

Nil

Does the facility have a Business Ethics Policy and is the policy communicated	$\mathbf{k}$	Internal Policy	
and applied internally, externally or both, as appropriate?		Policy for third parties including suppliers	
	Please give details:		
		e is a written policy on the need to avoid bribes and ulent practices.	

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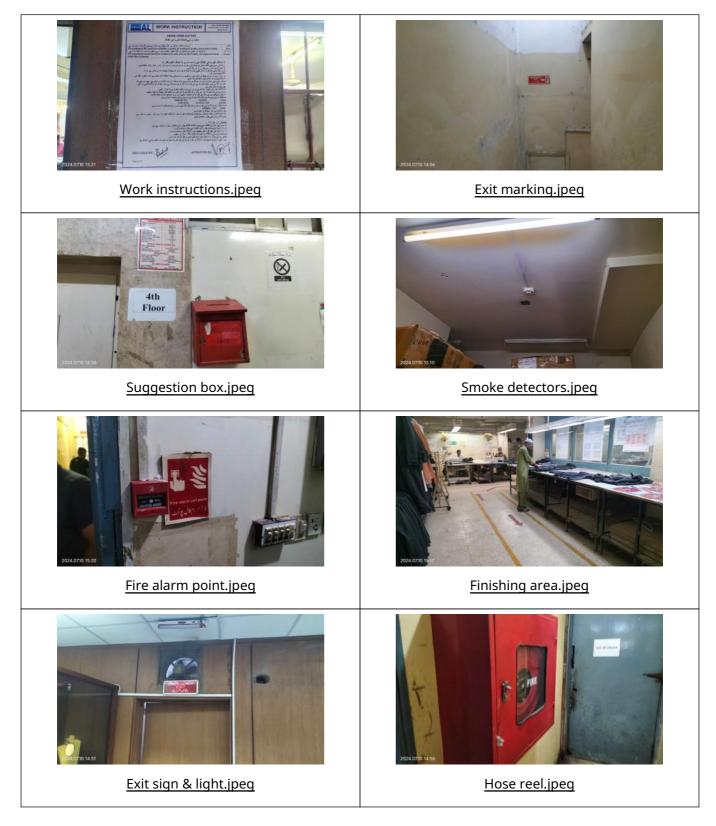
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☑ Yes □ No	
business ethics issues?	Please give details:	
	Facility provide trainings on regular intervals.	
Is the policy updated on a regular (as needed) basis?	🗹 Yes 🗆 No	
	Please give details:	
	Policy is updated on regular basis as required.	
Does the site require third parties including suppliers to complete their own	🗹 Yes 🗆 No	
business ethics training	Please give details:	
	Site has a policy that requires business partners to complete their own business ethics training.	





Sedex Members Ethical Trade Audit Report Version 6.1

# Attachments



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: End Date: 0 2024-07-12







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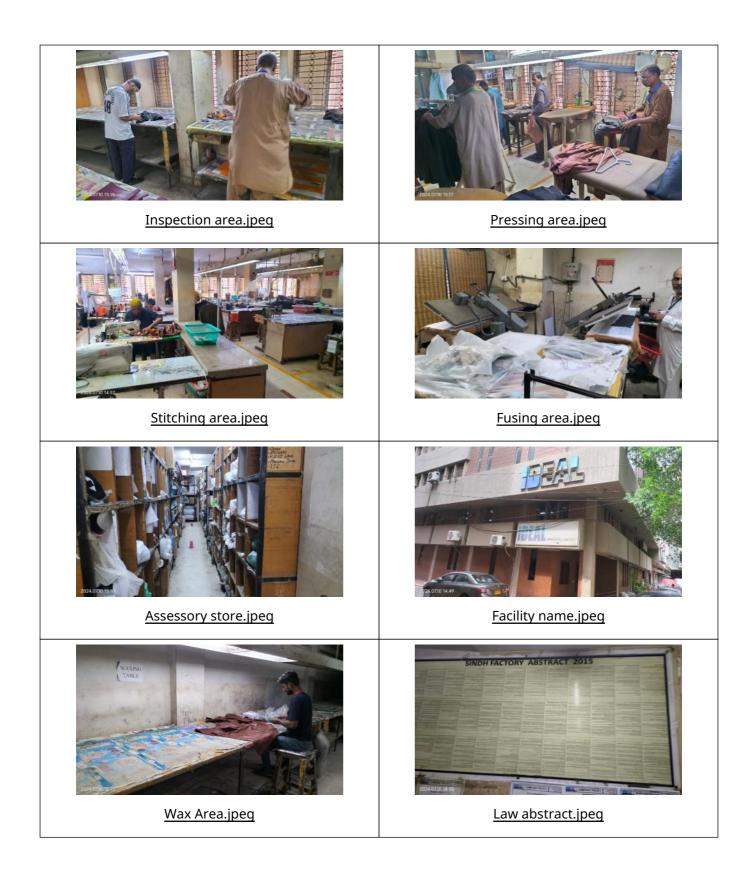
Report reference: ZAA600076299

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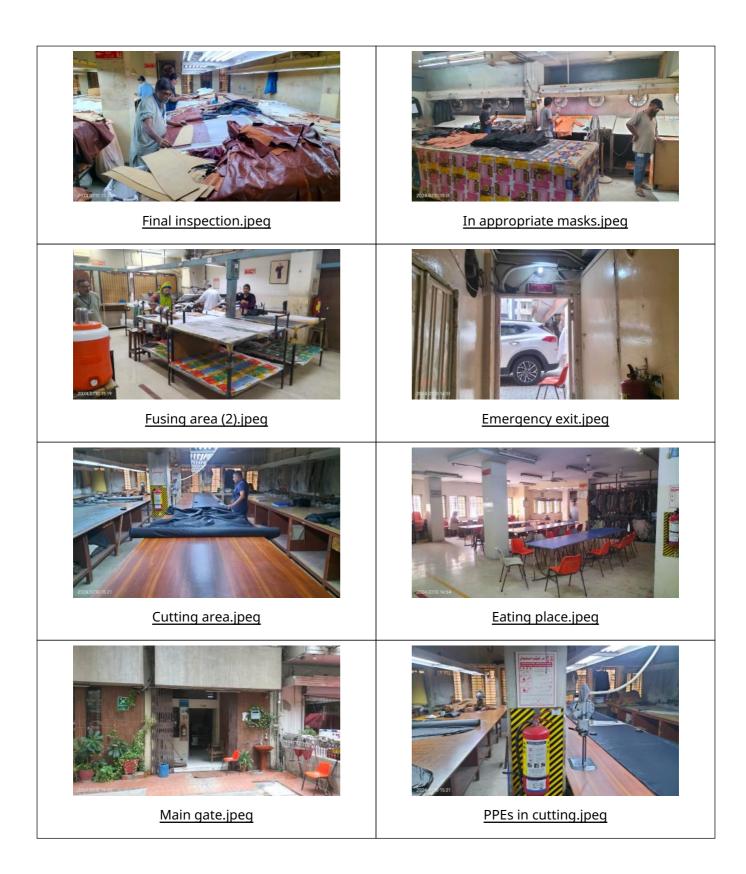
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Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

Click here for Auditors:

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