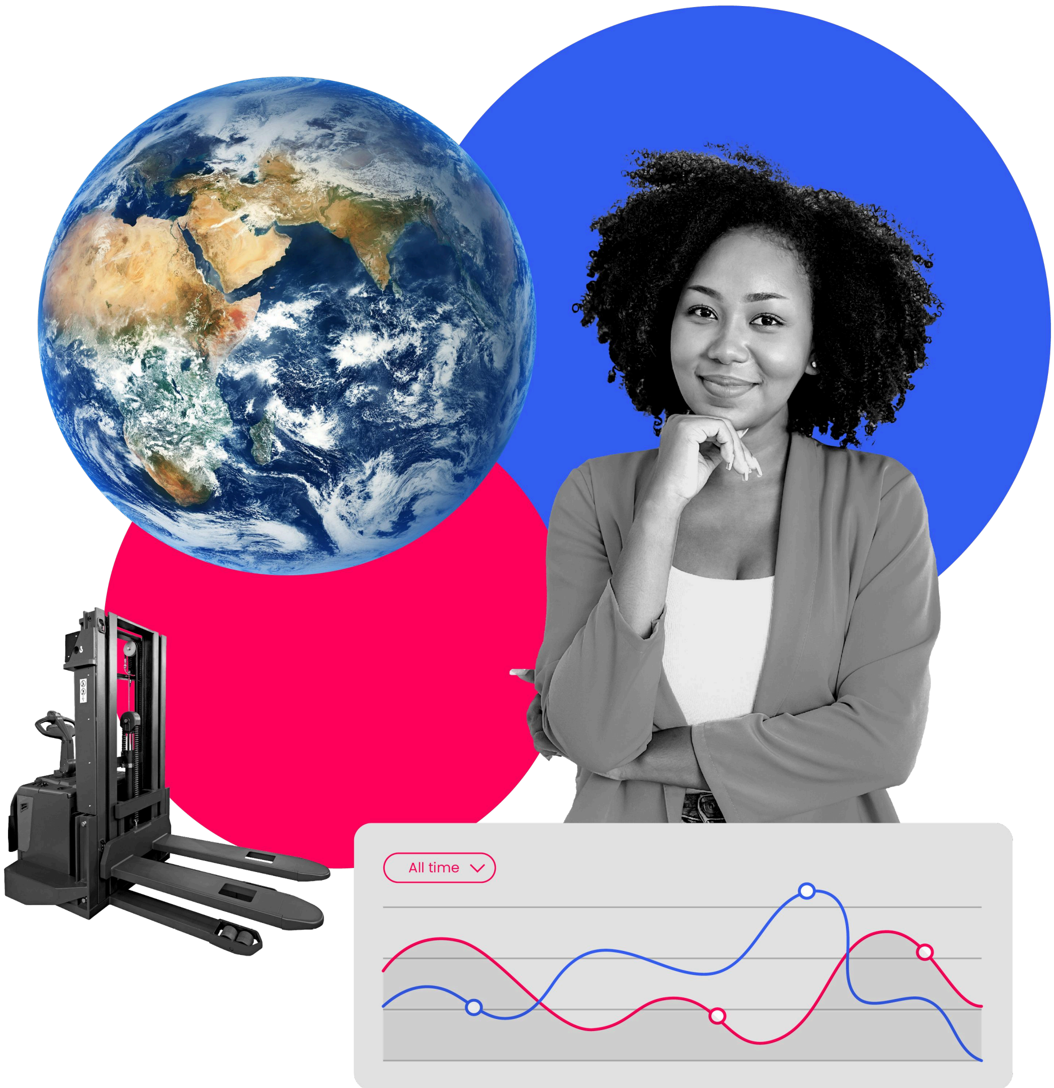
SMETA powered by Sedex

Sedex Members Ethical Trade Audit Report

Version 7



Contents

Audit content

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

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

2-pillar audits include:

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

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

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

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

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

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Findings →

Audit details

Site details

Sedex site reference	ZS1000074412	**Site name**	SRI EESAN INTERNATIONAL
Business name	SRI EESAN INTERNATIONAL	**Site address**	639001 D.NO/ PLOT NO : 19,50 Feet Road Ramakrishnapuram, Karur, IN

Audit details

Sedex company reference	ZC5000062704	**Auditor company name**	International Associates Limited
Date of audit	2025-06-19	**Audit conducted by**	VISHNUPRAKASH R
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out	Day 1	
	In	09:30
	Out	16:00
Audit type	Full initial	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Mr. T Saravanan / Factory Manager	
Any conflicting information SAQ/Pre-Audit Info	No	

← Contents

Findings →

Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no union available in the factory		
Reason for absence during the audit	There is no union available in the factory		
Reason for absence at the closing meeting	There is no union available in the factory		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	Nil

Lead auditor	VISHNUPRAKASH R	**APSCA Number**	32200203
Additional auditor	Bhuvana Arumugam	**APSCA Number**	21703068
Date of declaration	2025-06-19		

← Contents

Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. T Saravanan
Title	Factory Manager
Date of declaration	2025-06-19

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	Local law	NC ZAF600986865
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF600986866
9. No harsh or inhumane treatment is allowed	9.C Implement, adopt and communicate to all w...	Local law	NC ZAF600986867
10.B. Environment 4-Pillar	10.B.I Monitor and mitigate the site's impact...	Base code	NC ZAF600986868

← Contents
Management systems →

Management systems

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

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

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

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000062704	
Sedex site reference	ZS1000074412	
Company name	SRI EESAN INTERNATIONAL	
Business ownership type	GOODS	
Site name	SRI EESAN INTERNATIONAL	
Site name in local language		
GPS location	**GPS address**	19, 50 Feet Rd, Ramkrishnapuram, Karur, Tamil Nadu 639001
	Coordinates	Latitude: 10.965489962372228 “N”, Longitude: 78.07893396875919 “E”
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Mr. C Shanmugam
	Job title	General Manager
	Phone number	9843031939
	Email	shanmugam@srieesan.com

← Management systems Worker analysis →

Company and site details

Applicable business and other legally required business license numbers and documents	•Business License Registration No: KRR00519 obtained on 06/10/2021 for 50 workers and 10 HP and valid for 31/12/2026. •GSTN Registration No: 33AAHFS8677E1ZV date of Issue certificate 02/08/2018. •Importer-Exporter Code: 0498049558 dated on 28/05/2020. •Approved Building Plan Number - E/3126/2016 obtained from Joint Director of Industrial Safety and Health, Trichy and dated on 19/08/2016. •Building Certificate of Stability for Ground + 4 Floors only dated on 14/06/2023 and valid upto 13/06/2026 obtained through competent person [Registration No: H1/13754/2022 dated on 25/11/2022 valid upto 24/11/2024]. •Factory has obtained Fire License, L.DIS.No. 6711/C1/2024 (SWP T.No: 221868) obtained from District Officer, Fire & Rescue Services, Karur District dated on 28/09/2024 and valid for 1 year. •Factory has obtained Sanitary certificate, Roc.No: 1570/2025/H1 from City Health Officer, Karur City Municipal Corporation, Karur and dated on 16/05/2025 and valid for 1 year. •Factory has obtained approved standing order, B/1989/2019 from Additional Commissioner of Labour, Tiruchirappalli dated on 16/09/2019.

← Management systems
Worker analysis →

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Manufacture of made-up textile articles, except apparel
	Secondary	
	Other	
Product type	Manufacturer and Export of all Home Textiles Products	
Process overview	Products: Manufacturer and Export of all Home Textiles Products Production Capacity: Approx. 100000 Pieces per month, which once again depend on the style and design. Scope of the Organization: Manufacturer and Export of all Home Textiles Products through processes as Receipt of fabrics, Inspection, Cutting, Sewing, Checking, Packing and Dispatch. Sub-Contracted Process: Weaving, Dyeing and Printing Machinery details: Sewing Machine – 4, Generator – 1, Needle Detector – 1, Strapping Machine – 1, Compressor - 1. Production Line - 1 Sewing Line	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	1042m²

← Site details

Worker analysis →

Site scope

Building 1	**Last construction works on site**	1998
	If building is shared, provide details	The factory has not shared the building.
	Number of floors	5
	Description of floor activities	The factory was established on 24/12/1998 at the current location. It is a Partnership Company. The factory was Manufacturer and Export of all Home Textiles Products. There was total 01 building in the factory with the total land area of 241.55 Square Meter and Build up area is 1042.18 Sq Meter. The building details are as follows: Building 1: Ground Floor: Fabric storage, Fabric checking, Toilet, Genset, Compressor First floor: Office room, Toilet Second floor: Checking, Packing, Toilet Third floor: Cutting, Stitching Fourth floor: Showroom, Toilet

Is there any difference between the site scope of the audit and the Sedex site profile?	No
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No
Is any activity conducted onsite not included within the scope of the audit?	No

← Site details
Worker analysis →

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable The factory has not arranged transportation for workers to the worksite and not required as per legal requirement.

Work patterns

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

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	SA 8000 (Social performance management), Other certification •Factory has obtained Global Recycled Standard 4.0 (GRS) certificate through Intertek dated on 22/06/2024 and valid upto 21/06/2025. •Factory has obtained SA8000:2014 certificate through Intertek dated on 04/02/2025 and valid upto 03/02/2028.

← Site details
Worker analysis →

Site assessments

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No The site not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No The factory has not conducted Human Rights Impact Assessments (HRIA) in last 3 years.

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	7	*(50%)*	7	*(50%)*	-	-	14	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	7	*(50%)*	7	*(50%)*	-	-	14	*(100%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

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

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from Not Applicable

Workers by age

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

* % of total workforce

← Worker analysis   Worker interviews →

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Indian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	50%	50%	-	100%

Workers by remuneration type

	Men		Women		Other		Total	
Workers paid per unit (piece rate)	0	-	0	-	-	-	0	*(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0	-	0	-	-	-	0	*(0%)*
Workers paid hourly / daily rate	0	-	0	-	-	-	0	*(0%)*
Salaried workers	7	*(50%)*	7	*(50%)*	-	-	14	*(100%)*

* % of total workforce

← Worker analysis

Worker interviews →

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	7	(50%)	7	(50%)	-	-	14	(100%)
Other	0	-	0	-	-	-	0	(0%)

* % of total workforce

If other payment cycle entered, please provide details	Not Applicable

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	3	(100%)	0	(0%)	-	-	3
Supervisors or team leaders	3	(75%)	1	(25%)	-	-	4
Administrative staff	1	(33.3%)	2	(66.7%)	-	-	3

← Worker analysis
Worker interviews →

Worker interview summary

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

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	01 Group of 5 workers
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis

Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) As per the workers interview, there is no complaints against the facility.
What did the workers like the most about working at this site?	Freedom of movement Hours worked, rest days or breaks Pay Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.)
Additional comments	All workers said they were satisfied with their employment at the factory and with the current wages which in their view were in line with wages in the locality. They had good relationships with their supervisors and managers who treated them with respect. Factory management and employees were found cooperative during the interview process without any signs of coaching. Through interview with workers, it was noted that all workers were satisfied with the factory and no negative comment was received. It was found that employees were aware of their rights and duties legal minimum wage and deductions. Employees had informed that Manual Time Card is used for in and out time recording and no complaints on the same. During employee's interview noted that all of them receive wages on time and through Bank Transfer on or before 7th of every month. All the interviewed told they receive salary slip one day before Pay Day and understandable to them. All workers confirmed overtime is voluntary. Worker committee members understand their responsibilities. Employees were satisfied with the working conditions at the factory

← Worker analysis
Measuring workplace impact →

Attitude of workers

Attitude of workers' committee/union representatives	Through interview with worker representative, that they are satisfied with the management and no negative comment raised by them. No union available in the factory.
Attitude of managers	The factory management was found to be co-operative throughout the audit. Provided full access to auditor throughout the audit and they allowed to take photographs.

Workers interviewed by type

	Total
Permanent workers	12
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	12

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	0	5	-	5
Workers interviewed individually	6	1	-	7

← Worker analysis
Measuring workplace impact →

Migrant workers interviewed

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

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	12.0%	12.0%	-	24.0%
Previous full calendar year (2023)	17.0%	17.0%	-	34.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	3.0%	3.0%	-	6.0%
Last full calendar year (2024)	2.0%	2.0%	-	4.0%
Previous full calendar year (2023)	4.0%	4.0%	-	8.0%

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

Are accidents recorded?	Yes Accident Register Maintained and Verified. No accidents happened so far.

← Worker interviews

Code area 0 →

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

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

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

Lost day work cases (per 100 workers)*

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

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

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

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

← Worker interviews

Code area 0 →

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

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

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

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	The audit was initiated with the quick site tour before the opening meeting (since the audit is semi announced). The factory allowed the auditor to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself (including outbuildings and accommodation). Provide the auditor with genuine and authentic records. The factory has not offer bribes to or threaten the auditor, nor in any way induce the auditor to be dishonest. The factory is provided an accurate site description and Sedex site profile declared prior to the audit. The factory has established written human rights policy statement that is approved at the Executive Director, communicated to all personnel, and trained to relevant personnel. Evidence examined Human rights policy dated 01/06/2024 Social Policy dated 01/06/2024 Training Records Business License KRR00519 (50 workers / 10 HP) valid until 31/12/2026 Site tour Management and Workers Interaction

← Measuring workplace impact
Code area 1 →

0. Enabling accurate assessment

Data points

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

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

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

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	Management systems for Freely chosen employment is reviewed and the following MSA is assigned for this code section. a) The Facility has developed the policy ("Forced Labour" dated 01/06/2024). Policy indicate that employment is voluntary, Workers are not forced into jobs, they have the right to leave their employment freely without penalty or undue restriction, and the recruitment is transparent, without requiring any form of payment or illegal fees from workers, no restriction on freedom of movement. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in this Base Code Area. b) Management Representative is responsible for ensuring that recruitment practices are transparent. Also committed that no fees are charged to workers for recruitment, no false promises are made, and that all job offers are voluntary. All employees are provided with written contracts that explain their rights, job duties, compensation, working hours, and conditions under which they may leave the employment voluntarily. Facility ensure that employees can leave the organization without fear of retaliation and no employee is restricted in their movement or ability to terminate their employment. However, during the audit, it is observed that lacks adequate awareness and knowledge about forced labor, which needs more attention and understanding on the complexities of forced labor for tackling it effectively. c) Policies on freely chosen employment are displayed and is easily accessible to all employees. Periodic refresher training for all employees is provided on their rights, with a specific focus on ensuring employment is voluntary, no fees for recruitment, the right to leave without penalty, and the freedom to movement within the company or Freedom to leave employment. Last Training on ETI base code covering human rights (covering Forced labour) was provided on 15/03/2025 and Company Policies on 01/06/2024. During the audit process, it was observed that employees' understanding of workplace requirements is insufficient. Furthermore, the mechanisms for assessing the effectiveness of training programs-specifically in relation to employees' awareness of their rights regarding freely chosen employment and the identification of unethical practices-are inadequate. We recommend that comprehensive training be provided to all employees, including managers and supervisors, on relevant policies and procedures to enhance their understanding and compliance. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is effectively done by spot checking recruitment practices, contracts, working conditions, and employee feedback, to create a safer and more ethical work

← Code area 0

Code area 1.A →

Management systems

	environment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section	1. Worker interviews, security procedures/interviews, worker behaviour, management behaviour and the facility walkthrough did not evidence any area of concern. 2. Factory has not controlled workers through threats, penalties, coercion, physical force, violence, or harsh or inhumane treatment 3. All the personals who are working in the company have the right to leave the work place premises after completing the standard work day and free to terminate their employment provided that they give reasonable notice to the company. 4. The factory is using CCTV for general facility safety. CCTV not used for the purpose of controlling or intimidating workers. 5. Based on the interview with the workers, factory has not unreasonably prevent workers from communicating with each other's inside or outside the workplace, not deny workers social interaction or otherwise intentionally subject workers to isolation. 6. The facility does not withhold any part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company. 7. Workers are paid on monthly basis, on or before 7th of every month. No delay in wage payment observed. The facility not withhold any payments until a worker's term of work is complete (forced savings), delay payments, or implement any other financial scheme that prevents workers from leaving their employment. 8. Facility Not intentionally place workers in debt. For example, by undervaluing the work performed, inflating interest rates or charging workers above market rates (e.g. for food or housing). No loans or advances provided by the factory. 9. No recruiting agents are employed; no deposits or original documents are collected and retained. The employees are free to leave employment on their own will after reasonable Notice. 10. The employment contract includes all the areas to be addressed with regard to the standards including working hours, remuneration and the benefits due to them. Evidence examined 1. Documented policy on Forced Labor and Recruitment. 2. Wages paid records 3. Record of hiring / dismissal or deductions. 4. Personnel records of employees. 5. Recruitment Procedures 6. Appointment letter

← Code area 0

Code area 1.A →

1. Employment is freely chosen

Data points

If required under local law, is there a published ‘modern slavery’ or similar statement?	Yes The factory has established “Forced Labour Policy” which is included ‘Modern Slavery’ statement
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1 Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

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

← Code area 1
Code area 2 →

Management systems

Explanation for management systems grades	Management systems for Responsible Recruitment and entitlement to work is reviewed and the following MSA is assigned for this code section a) The Facility has developed the Ethical Recruitment Procedure dated 01/06/2024. Procedure is in place to ensure that all employees are legally entitled to work in the country where they are employed. Policy includes commitment to ensure that its recruitment practices are ethical, transparent, and compliant with legal requirements. There is no workers engaged through third party agencies as of now. Procedure is describing the process of legal conditions when any third-party employment agencies or other recruitment agencies are engaged. b) Management Representative is responsible for ensuring that recruitment practices are transparent and adhering to legal work entitlement requirements. This includes ensuring that recruitment practices are ethical and safeguarding the rights of workers, promoting a fair and lawful working environment. However, during the audit, it is observed that they lack adequate awareness and knowledge about Ethical recruitment Process, which is an essential component in preventing exploitation. c) The Recruitment Policy is prominently displayed and readily accessible to all employees. Scheduled refresher training is set to take place on 15/03/2025. This training will encompass key principles of ethical recruitment, legal obligations related to work entitlement, and strategies for addressing potential issues such as exploitation and discrimination. These topics are integrated into the recruitment process training as outlined in the training plan, ensuring effective implementation of this workplace requirement. Currently, no employees have been recruited through third-party agencies. However, the audit revealed a notable gap in awareness and understanding of the Ethical Recruitment Process among staff, which is crucial for preventing exploitation. d) The facility had conducted Internal audit on 08/03/2025 by the H&S Representative team as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is effectively done, by spot checking recruitment practices, contracts, working conditions.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 1

Code area 2 →

No findings

Systems and evidence examined to validate this code section	1. Based from the review of employee attendance records and employee's interview, the facility has not employed any foreign nationals. 2. Based from the review of employee personal files, all the employees are holding the legal rights to work. 3. The facility has provided appointment letter, which is having the details of nature of work, working conditions, living conditions, employment terms, living costs, wages and benefit. 4. Factory has hired workers directly. No 3rd party employment agencies used by the facility. 5. All recruitment related costs are borne by the facility. No recruitment fees collected from the workers. Evidence examined 1. Personal file 2. Appointment letter for interviewed workers 3. Worker interview 3. Recruitment policy and procedure

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

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

Migrant workers

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

← Code area 1.A

Code area 2 →

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

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
Were recruitment fees or costs identified during worker interviews?	No Recruitment fee is not collected by the factory

← Code area 1.A

Code area 2 →

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

Management systems

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

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	Management systems for Freedom of Association and Right to Collective Bargaining is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy on "Freedom of association and the right to collective bargaining" dated 01/06/2024. Policy includes commitment to respecting employees' rights to freely associate, form, and join trade unions or other worker organizations. This Policy also ensure that workers have the freedom to express their views and protect their rights without fear of retaliation, discrimination, or unlawful interference by the employer. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) Management Representative is responsible for ensuring that the Freedom of Association Policy is developed in line with legal requirements and the organization's values and to demonstrate a commitment to upholding workers' rights. However, during the audit, it is observed that lacks adequate awareness and understanding of freedom of association, which may become significant barrier for advancing workers' rights and fostering fair labor conditions, in future. c) Policy on Freedom of association is displayed and is easily accessible to all employees. Facility ensures that employees are informed about their rights through periodic refresher training (last provided on 15/03/2024) and Company Policies on 01/06/2024. However, it is noted during the audit process that understanding level on this workplace requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as ensuring employees understand their rights regarding Freedom of association and collective bargaining, is not adequate. d) The facility had conducted Internal audit on 08/03/2025 by the H&S Representative team as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is effectively done, by having conversation with workers to ensure that no discrimination against for joining or forming unions, no retaliation occurs, and empowerment of employees to exercise their rights without fear of retaliation or discrimination.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 1.A

Code area 3 →

No findings

Systems and evidence examined to validate this code section	1. The organization has documented the system for compliance to this requirement. The facility has a written policy which states that workers have the right to lawfully form unions or similar organizations which give them the opportunity to address worker grievances and workplace issues collectively. 3. The organization has no trade union. The Organization has constituted a worker's committee constituted by 2 elected members. Election dated on 03/01/2025. This worker's committee addresses the worker's needs. Works committee meets once in 2 months, verified the meeting minutes Dated 05/06/2025. 4. Management has an open-door policy to address the employees' needs, as revealed during the interviews. 5. The Organisation does not discriminate, penalize, threaten, restrict or interfere with workers choosing to lawfully form or join unions or associations. 6. The worker interviews and document review confirm compliance to this standard. 7. The Organisation implements systems to establish better worker and management relations such as Health and Safety Committee, Workers Committee and Anti Sexual Harassment committee. 8. Workers Representative are aware about the roles and responsibilities during interview. Evidence examined 1. Details of Worker Committee & Workers Representative Interview: 2. Freedom of Association Policy 3. Worker Committee meeting minutes 4. Worker Interviews including Workers Representative 5. Suggestions from suggestion boxes and actions taken

← Code area 1.A

Code area 3 →

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← Code area 2

Code area 3 →

3. Working conditions are safe and hygienic

Management systems

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

← Code area 2
Code area 4 →

Management systems

Explanation for management systems grades	Management systems for "Safe and Hygiene Working Conditions" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy on "Health & safety" dated 01/06/2024 and Hazard and Risk assessment dated 01/06/2024 for identifying hazards and risks of its own operations. Facility developed procedures for providing a safe and healthy working environment to prevent accidents, defining roles and responsibilities, identifying risks, providing training, and continuous monitoring of performance. Policy and Procedures are appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) H&S Representative is responsible for ensuring that the Health & Safety Policy is developed in line with legal requirements and responsible for ensuring that Procedures are properly implemented and followed across all levels. This includes allocating resources, approving budgets for safety programs and health and safety practices are continuously improved and that a safe work environment is maintained. c) Policy on Health & Safety is displayed and is easily accessible to all employees. Facility ensures that employees are informed about Health & Safety through periodic refresher training (last provided on 15/03/2025) and Company Policies on 01/06/2024. However, it is noted during the audit process that understanding level on this workplace requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as ensuring employees understand safe and healthy work place is not adequate. d) The facility had conducted Internal audit on 08/03/2025 by the H&S Representative team as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done to ensure that functioning of safety equipment, adequate safety signage, or safe work practices are implemented. However, during internal audit, the H&S Representative team failed to identify the below points. 1. During the factory tour, it was noted that emergency lighting equipped with battery backup is not installed in the area leading from the first floor to the ground floor at the back side of the facility. 2. During the document verification it was noted that the validity of the pressure vessel inspection certificate found expired on 12/06/2025. The factory has applied for renewal and payment dated on 09/06/2025.

Summary of findings

← Code area 2 Code area 4 →

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	Local law	NC ZAF600986865
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF600986866

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	A) General Health and Safety management 1. Mr. D Saravanan - Health & Safety Representative is responsible for Health & Safety aspects for the site 2. The Organization has a written Health and Safety plan that indicates how all Health and Safety issues are being managed at the facility. The plan includes what steps the facility is taking to ensure that health and safety risk areas are being identified and addressed 3. Sufficient clean toilets were available at all times to workers 4. Ventilation, temperature and lighting were adequate for the production processes 5. Verified the risk assessment for all the process. Risk Assessment for the following locations reviewed by Health and safety Committee. Committee comprises of representatives of Management and workers from all the sections. Packing, office, ergonomics, young worker, absenteeism, First aid box, Transmittable diseases, non-transmittable diseases, Natural disasters, Differently abled persons, manmade disasters, Transport, Driver. However, validity of the pressure vessel inspection certificate found expired on 12/06/2025. The factory has applied for renewal and payment dated on 09/06/2025. 6. Organisation has constituted the Health and Safety committee and have a representation from worker and management. The Health and safety committee comprises of 04 members. 7. The Health and Safety committee meeting is conducted once in 2 months. This committee monitors the fire and risk prevention and report to the Health and Safety Representative and also address during the meeting. Verified the records of the meeting dated 02/06/2025. 8. Health & Safety education is provided to all workers during initial orientation and on an ongoing basis. Periodic trainings on Health & Safety are provided to staff & workers as per the training plan. Last training was conducted on 03/04/2025. 9. All the workers were seen using the PPEs during working hours. PPE's at company cost provided to workers where ever is necessary. 10. Health & Safety policy is communicated to workers through induction training, notice boards in Both English and Tamil. 11. Adequate Wash Rooms are available in the facility (Separate for Men & Women) – 03 toilets for men and 03 toilets for women and are in good condition. 12. Good Ventilation, Illumination and Work Environment evidenced. B) Fire Safety 1. Exits and one emergency exit is available the width of exits are 8 Feet and width of emergency exit is 6 Feet. Assembly areas are marked and workers are aware of assembling at the assembly areas in case of emergency. Assembly area is identified at the entrance of the ground floor, which is spacious to accommodate all workers to get assemble. The factory has installed five exit doors and five emergency exit doors,

← Code area 2 Code area 4 →

all of which are designed to open inward. Additionally, the facility has implemented a locking mechanism for all doors to ensure they remain open during working hours.
2. Fire Safety external training is conducted by Bharath Fire Safety Equipments for 19 workers on 05/06/2025. List of fire-fighting trained persons with photos of trained persons are displayed in the notice board as well as near to each fire extinguisher.
3. Facility has been conducting mock drills and the Last drill conducted on 03/05/2025. Evacuation time is 95 seconds. Total participants: 22 workers.
4. Total 14 fire extinguishers are present. The fire extinguisher is checked at a frequency of every month.
5. Emergency evacuation plans – 10 numbers are displayed at prominent locations.
6. Facility has provided 10 fire alarm call points, 10 Smoke detector and 08 emergency lights.
7. Pathways are marked with yellow lines and Red arrow marks are marked which directs to the emergency exit and to the assembly point.

C) Electrical safety
1. All electrical equipment was maintained in good condition.
2. The generic cabling system for building was designed according to local law. Permanent conduit wiring was in good conditions with no broken junctions or wires sticking out at the ends of the conduit.
3. All electrical wiring and wiring rails were cleaned regularly. Also storage of materials in and around all electrical panels were kept away to allow immediate access in the event of an emergency and prevent fire from arching parts.

D) Chemical safety
1. The Organisation does not use any chemicals.
2. No hazard chemicals used for production

E) Medical services
1. The emergency contact numbers are appropriately displayed at the main entrance. 05 First Aid Box available, First aid box is checked for the availability of first aid medicines at frequent interval by the H & S Representative and it is also discussed in the H & S Committee meeting.
2. The Organization maintains the First aid box medicine consumption register. The reasons for using the medicines are recorded in the First aid box medicine consumption register. No cases were lead to Hospitalization
3. No evidences of Near Miss so for, for the past one year. Organization has stated “NIL” Fire Case, Nil Fatal Accident, Nil Reportable Accident during last one year. No Near Miss recorded.
4. First aid training provided to 04 workers through Tamil Nadu Apex Skill Development Centre For Healthcare on 05/07/2024 and valid for 04/07/2026.

← Code area 2 Code area 4 →

Evidence examined

1. Health and Safety Policy
2. Factory License – Valid till 31/12/2026
3. Fire License – valid till 27/09/2025
4. Stability Certificate dated 14/06/2023 and valid upto 13/06/2026.
5. Industrial accident records – Updated so far
6. Health & Safety Committee meeting minutes.
7. Last Portability Drinking Water Test report dated 04/01/2025
8. Fire Drill conducted once in 2 months. Last drill was conducted on 03/05/2025
9. Fire fighting training provided on 05/06/2025.
10. Interaction with Management and Interview with employees.

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF600986865

Non-compliance

Due 2025-08-25

Code area

3 Working conditions are safe and hygienic

Workplace requirement

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

Issue title

211 - Emergency notification and exit lighting systems not connected to secondary power source

Description

During the factory tour, it was noted that emergency lighting equipped with battery backup is not installed in the area leading from the first floor to the ground floor at the back side of the facility.

Corrective and preventative actions

It is recommended that the facility install emergency lighting with battery backup in all designated areas to ensure safety and preparedness.

Local law reference

In accordance with Tamil Nadu Factories Rules, 1950, Chapter III, Rule 61 (9) (e), the exits shall be clearly visible and suitably illuminated with suitable arrangement, whatever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.

Status

Closed (2025-07-17)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 09:10 (UTC) on 17 Jul 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600986866

Non-compliance

Due 2025-07-26

Code area

3 Working conditions are safe and hygienic

Status

Open*

← Code area 3

Code area 4 →

Workplace requirement

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

Issue title

267 - No/inadequate certificates for inspections of machinery, or machines not registered as required by law

Description

During the document verification it was noted that the validity of the pressure vessel inspection certificate found expired on 12/06/2025. The factory has applied for renewal and payment dated on 09/06/2025.

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Corrective and preventative actions

It is recommended that, the factory shall obtain the pressure vessel inspection certificate from the concerned authority.

Local law reference

In accordance with the Tamil Nadu Factories Rules 1950, Rule No. 56 which states that no pressure vessels or plant shall be used in factory unless obtaining the certificate from the notified person specifying the design pressure or maximum permissible working pressure thereof and stating the nature of test to which the pressure vessels or plant & it's fittings (if any) have been subjected & the certificate shall be kept available for the perusal by the inspector.

* PDF generated at 09:10 (UTC) on 17 Jul 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, other (please explain) The factory has appointed Mr. D Saravanan [Stitching Incharge] as Health & Safety Representative dated on 01/01/2025.
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No structural additions were in the factory building.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

← Code area 3 Code area 4 →

Does the site have a structural engineer evaluation?	Yes

[← Code area 3] [Code area 4 →]

4. Child labour shall not be used

Management systems

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

← Code area 3

Code area 5 →

Management systems

Explanation for management systems grades	Management systems for "Child Labour" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy on "Child labour" dated 01/06/2024. "No Child labour entry" dated 01/06/2024 and "Child remediation" procedure dated 01/06/2024. Policies commit that, not to use child labor and to remediate any cases of child labor found. Policies are appropriate for the site context and is in compliance with the Workplace Requirements in this Base Code Area b) Management Representative is directly responsible for ensuring that all employees meet legal age requirements during the recruitment process and remediation of any cases of child labour if found. This includes verifying the age of potential employees before hiring them, either by checking government-issued ID or other forms of age documentation. c) Policies are displayed to make sure everyone knows what is expected. Training on ETI base code (including this Policy and Procedure) was provided on 09/07/2024 and Company Policies on 01/06/2024 to ensure the workers understand the expectations and their rights. Training hiring staff on age-verification techniques and communicating child labor prevention requirements is part of the training Plan. d) The facility had conducted Internal audit on 09/10/2024 by the management Representative team as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done by spot-checking the age documentation and having conversations with recruitment staff members to ensure whether they have understood how to verify the age of job applicants and identify falsified documents.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 3

Code area 5 →

Systems and evidence examined to validate this code section	1. The facility has hiring policies and procedures that ensured that the minimum age of workers corresponds to all local laws, ILO Standards and other requirements. 2. The age of each worker is verified prior to his or her employment. 3. Updated personnel files are maintained for each worker in the system. Such files have copies of basic worker information such as an identification card, School leaving certificate for age proof, Nomination forms, Appointment order and service records. 4. The facility ensures that these workers are not working beyond the restricted hours and comply with all applicable laws governing minimum working age. No one is under 18 is permitted to work in this facility, however the minimum age for work as per law is set at 15 years 5. There were no young workers. Child labour remediation is established. Worker interviews confirmed the absence of child labour or young workers in the facility. 6. The organization has communicated the requirement by displaying outside the main gate 7. All the workers, staff confirmed that there is no child labour working in the organization. Evidence examined 1. Review of Child Labor Policy 2. Site Tour 3. Worker interview 4. Management interview 5. Age proof document

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	25
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

← Code area 4

Code area 5 →

5. Legal wages are paid

Management systems

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

← Code area 4

Code area 5.A →

Management systems

Explanation for management systems grades	Management systems for "Legal wages" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy on "Wages" dated 01/06/2024 and related Procedures. Procedure establishes guidelines on pay structures, bonuses, benefits, and other forms of compensation, ensuring fairness, equity and transparency in the organization's approach to employee remuneration. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) Management Representative is responsible for ensuring that compensation and benefits are administered fairly, transparently and in compliance with the established guidelines / Legal requirements. This includes pay increases, bonuses, and coverage of Social benefits and ensuring that salary structures are applied consistently across the organization. However, during the audit, H&S Representative and the team participated in the audit and it is observed that they lack proper understanding of living wage for ensuring that workers are paid fairly. c) Policies are displayed to make sure everyone knows what is expected. Facility ensures that employees are informed about Wage / Benefits through periodic refresher training (last provided on 15/03/2025) and Company Policies on 01/06/2024 to promote fairness and ensure that compensation decisions are made according to guidelines. However, it is noted during the audit process that understanding level on this workplace requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as ensuring employees understand the benefits they are entitled to, like Living wage, Leave benefits, Bonus, Insurance, Provident fund, Premium Overtime wages etc., is not adequate d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done by verifying the contracts, pay structures, Due remittance of Social benefits to Government authorities and consistency in salary levels across different job categories and roles, no discrimination across different worker groups (including vulnerable workers) according to legal requirements.

Summary of findings

← Code area 4

Code area 5.A →

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	1. The facility pays the minimum wages applicable for the Tamil Nadu State Home Textile minimum Wages – Zone A from 01/04/2025 to 31/03/2026 2. The payroll records reviewed for the past one year and details are recorded on sample basis. 3. Verified the salary slips and wage register. Verified the Salary given to the employees for the Past one year and found that organisation is paying the Minimum wages prescribed by the Government. 4. The organization remits the EPF & ESI contributions as per the law requirements. Verified the ESI paid receipt for the past 12 months. The factory has made on time payment for social security benefit. 5. Workers are aware of their leave policy, leave wages and bonus. 6. Verified the Settlement record of the employees. 7. The workers are paid through Bank Transfer on or before 7th of every month. 8. There are no piece rate workers employed. And also, no Home workers involved. 9. No deduction or fine charged on any of worker participating in committee meetings. 10. There is no payroll agency deployed by the organization. 11. No one receives wages on behalf of a worker. Evidence examined 1. Wage record & payroll record verified for May 2025, Dec 2024, Aug 2024 2. Record for deductions from wages. 3. Payslips verified. 4. Worker interview 5. Local and national laws 6. Wages and benefits policy 7. Local legal minimum wage documents

← Code area 4 Code area 5.A →

5. Legal wages are paid

Data points

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

Worker renumeration

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

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Daily Monthly	
Is actual wage data available on site for any of these options?	Daily Monthly	
Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable

← Code area 5

Code area 5.A →

Actual required working hours	**Required hours per day**	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	13.0
Minimum legal wage	**Min per hour**	Non applicable
	Min per day	301.46
	Min per week	Non applicable
	Min per month	7838.0
Actual minimum wage	**Actual per hour**	0.0
	Actual per day	363.46
	Actual per week	2181.0
	Actual per month	9450.0
Minimum legal overtime wage	**Min per hour**	Non applicable
	Min per day	151.0
	Min per week	904.0
	Min per month	Non applicable

← Code area 5 Code area 5.A →

Actual minimum overtime wage	**Actual per hour**	0.0
	Actual per day	182.0
	Actual per week	1090.0
	Actual per month	1181.0

Wage analysis

Number of workers' records checked	36
Provide the date and details of the records	Total of 12 employees were interviewed and the same numbers of records were reviewed for the months of May 2025 (Current month), Dec 2024 (Random month) and Aug 2024 (Random month).
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes The factory has following Tamil Nadu Home Textile minimum Wages – Zone A from 01/04/2025 to 31/03/2026 – DA INR 1958 Cutter, Mending – INR 351.8462 per day / 9148 per month Tailor & Ironer - INR 348 per day / 9048 per month Checker & Packer – INR 321.0769 per day / 8348 per month Sweeper, Trimmer & Helper – INR 301.4615 per day / 7838 per month
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	The factory has paid to workers as below Cutter: INR 11000 per month Tailor: INR 9850 per month, Checkers: INR 10000 per month Packer: INR 9450 per month

← Code area 5 Code area 5.A →

Are there any bonus schemes used?	Yes Bonus calculated on workers earned wages of every month for the year of 2023-2024 (Oct 2023 to Sep 2024) and paid on 23/10/2024. Factory has paid 8.33% bonus to workers. EL for the year 2024 [Jan 2024 to Dec 2024] Paid on 08/01/2025.
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

← Code area 5 Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Organization has calculated the BLW on Anker methodology by means of conducting a survey among the workers. Based on which BLW calculated by the Client is INR 7,112.00. Minimum wage declared by the local government is higher than the living wage calculated by the factory [INR 7,838 per month]. Factory has paid applicable minimum wages as declared by the local government. During the worker's interview, it is revealed that workers could able to save at least 10% of the income. Evidence examined 1. Living Wage Calculation 2. Worker Interview 3. Management Interaction

← Code area 5 Code area 6 →

6. Working hours are not excessive

Management systems

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

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	Management systems for "Working Hours" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy on "Working Hours" and "Overtime" dated 01/06/2024. Policy define working hours per day, working hours per week, breaks, overtime hours to ensure that both employees and employers are aligned regarding the number of hours to be worked and compliance with legal requirements. System to track working hours is defined. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area b) Management Representative is responsible for implementing systems to track employee working hours, ensuring accurate reporting of hours worked, breaks taken, and overtime worked. Also, they are responsible for ensuring legal compliance and creating an environment to make employees report any issues, related to working hours. c) Policies are displayed to make sure everyone knows what is expected. Facility ensures that employees are informed about working hours, Breaks, Permissible overtime hours, weekly off through periodic refresher training (last provided on 15/03/2025) and Company Policies on 02/07/2024 to ensure that working hours are made according to guidelines. However, it is noted during the audit process that understanding level on this workplace requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as ensuring employees understand the Legal working hours per day and per week, Breaks, Weekly offs, Permissible Overtime hours etc., is not adequate d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done by verifying contracts, working hours and ensure no excessive working hours, no discrimination across different worker groups (including vulnerable workers) according to legal requirements.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 5.A

Code area 7 →

Systems and evidence examined to validate this code section	1. A total of 11 employees were interviewed and the same numbers of records were reviewed for the month of May 2025 (Current Month), Dec 2024 (Random Month) and Aug 2024 (Random Month). 2. Facility has restricted normal working hours to 8 hours per day and 48 hours per week. (The working time of the facility is from 09:30 Am to 07:00 Pm, Lunch Break – 01:30 Pm to 03:00 Pm and Tea Break: 11:15 Am to 11:30 Am, 04:15 Pm to 04:30 Pm provided. 3. Attendance & time monitoring is being carried out through Manual Time Card and attendance register for all employees. Proper record maintained & made available. In time/out time are updated daily in the time card, records verified. 4. Worker interviews and the records support what is claimed to be practiced. 5. Leave records are maintained. The Earn Leaves are 1 per 20 working days after having worked for 240 days. These are as per the government rules. Form V as per the Factories Act maintained for the mandatory Holidays year 2025. 6. Over time is voluntary. On review of Time cards, wage register and interview with workers. 2 Hours per day, 12 Hours per week and 13 Hours per month Overtime observed in the sampled month of August 2024. 7 The Holidays (National, Festival and Religious) are being provided to the workers / employees as per the requirement of relevant act. Holiday list is observed and displayed in the facility 8. Employees are free to leave after the work. Verified this from Time card verification and workers interview. 9. All trainings and various committee meetings are conducted during the facility working timings. No deduction or fine is charged from any of worker participating in committee meetings. Evidence examined 1. Time attendance records of 12 sampled workers 2. Workers' personal interviews 3. Management interview 4. Local and national laws 5. Working hours Policy & Procedure 6. Employment contracts

← Code area 5.A

Code area 7 →

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Factory has paid 200% of normal rate of wages for overtime working hours.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

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

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	Management systems for "Discrimination" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy on "Discrimination" dated 01/06/2024. This policy ensures that all employees, regardless of their race, gender, age, disability, religion, sexual orientation, or other protected characteristics are treated with fairness and respect. It also outlines the organization's commitment to equitable practices, aiming to eliminate biases and provide equal opportunities for everyone. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) Management Representative is responsible for fostering an inclusive and respectful workplace culture, ensuring that all employees are aware of the policy and their rights, and taking prompt and appropriate action in response to any complaints of discrimination or harassment. c) Policies on Discrimination is displayed to make sure everyone knows what is expected. Facility ensures that employees refresh their knowledge and awareness of the policy, and informed of any updates or changes on discrimination through periodic training (last provided on 15/03/2025) and Company Policies on 01/06/2024. Effectiveness of both communication and training ensures that the organization stays on track in its commitment to promoting equality and addressing discrimination. However, it is noted during the audit process that understanding level on this workplace requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as ensuring employees understand the various forms of discrimination, is not adequate. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done to assess whether the organization's actions align with its stated commitments and goals.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 6

Code area 8 →

Systems and evidence examined to validate this code section	1. The company has documented their Non-Discriminatory Policy. 2. The company respects employees' rights to follow their personal beliefs. It also ensures that all employment policies and practices are free from discrimination at every stage — including hiring, pay, training, promotion, termination, and retirement. Discrimination is not allowed based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, union membership, or political views. 3. The company does not allow any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language, and physical contact, in the workplace and, where applicable in residences and other facilities provided by the company for use by personnel. 4. The workers interview clearly established that there is Non-discrimination policy prevalent in the organization. Workers reported they are free to observe religious holidays. 5. Company, in their Manual has defined "No Discrimination" related to age, cast, creed, race, sex, nationality etc. to be considered. 6. The company does not entertain any type of pregnancy or virginity test under any circumstances for any female employee. 7. Anti-discrimination policy is documented & communicated to workers. Evidence examined 1. Worker interview 2. Non-discrimination policy 3. Equal remuneration register 4. Management interview 5. Worker personnel records – Application form, 6. appointment letter, 7. Salary Increment records

← Code area 6
Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	12%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	14%
Three most common nationalities in managerial and supervisory roles	Indian

8. Regular employment is provided

Management systems

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

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	Management systems for "Regular Employment" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the Recruitment Procedure dated 01/06/2024. Procedure is in place to ensure that all employees are legally entitled to work in the country where they are employed. Procedure includes commitment to ensure that its recruitment practices are ethical, transparent, and compliant with legal requirements. It outlines the terms and conditions when employees are hired on temporary, apprentice, irregular, sub-contracted or non-employment models of labour. There is no apprentice, temporary, irregular, sub-contracted workers as of now. b) Management Representative is responsible for ensuring the employment relationship is fair, effective and compliant with legal and organizational standards. Also, ensure that regular employees receive a written contract outlining the terms of their employment, including job description, working hours, compensation, benefits, and other relevant conditions. c) Policy on Recruitment is displayed and is easily accessible to all employees. Periodic refresher training for all employees is provided (last on 15/03/2025) and Company Policies on 01/06/2024. Facility has included the recruitment process training to HR team to effectively implement this workplace requirement. Currently, there are no temporary workers or apprentice at this site. However, during the audit, it is observed in the audit and they lack adequate awareness and knowledge about Ethical recruitment Process, they need more training on relevant policies and procedures. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done by verifying the contract which specifies the terms and conditions of employment, meet all legal requirements, any use of apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour for the purpose of avoiding its obligations relating to regular employment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 7

Code area 8.A →

No findings

Systems and evidence examined to validate this code section	1. Work performed is on the basis of recognised employment relationship established through national law and practice. 2. The facility signs labour contract with the employees at the time of employment, labour contractor is provided in local language, which workers understand, and workers are provided with copy of contract letters. 3. No home workers /apprentices/student's workers are employed by the facility. 4. Facility does not use 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. 5. 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. 6. Workers do not pay recruitment fee at any stage of the recruitment process. 7. Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers. 8. Interviewed workers confirm that have a contract of employment detailing all terms, including their rights and obligations, as well as notice and grievance procedures. The contracts are in in languages understood by them and all workers have a copy of their contract signed by themselves (not a third party) and the employer. Workers are not asked to sign any blank / unofficial documents. The original contract terms are not replaced or changed without the Worker's knowledge / consent. No extended probationary periods are used to prevent Regular Employment. Workers are not kept on temporary contracts to avoid regular employment or other benefits. Evidence examined 1. Workers personnel file including appointment order 2. Social Security benefits records 3. Workers interview 4. Timecard 5. Maternity benefits record

← Code area 7 Code area 8.A →

8. Regular employment is provided

Data points

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

← Code area 8 Code area 8.A →

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

Management systems

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

← Code area 8

Code area 9 →

Management systems

Explanation for management systems grades	Management systems for "Subcontracting" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the Subcontractor Policy & Procedure for Supplier Selection and Evaluation of Subcontractors dated 01/06/2024, the mechanism used to assess working conditions at sub-contracted sites, home workers and the process of Client approvals for subcontracted work to meet ETI Base Code. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) Management Representative is responsible for ensuring the subcontracted work meets the required standards, legal requirements, and ethical expectations. Also responsible for ensuring smooth operations, mitigating risks and compliance throughout the subcontracting process. c) Subcontracting policy is displayed and is easily accessible to all employees. System for Selection and Evaluation of Subcontractors, getting the approval from client before engagement of Sub-contractor is communicated to appropriate team. The facility has included this in training to Purchase team to effectively implement this workplace requirements. Factory has used subcontractors in this facility. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 8 Code area 9 →

Systems and evidence examined to validate this code section	1. Based from the interaction with the facility management and employees' interview, it is noted that the facility has used dyeing, weaving and printing process with subcontractor for their production process. 2. Facility is not using any Home workers. Evidence examined 1. Sub-Contracting Policy. 2. Inward and out ward material register. 3. Production records. 4. Interaction with management

← Code area 8

Code area 9 →

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

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No No, the supplier does not source products or services from supplier that use homeworkers. They ensure that all workers involved in the supply chain are working in proper, regulated environments that comply with ethical standards and labor laws.

Sub-contracting

← Code area 8.A

Code area 9 →

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No Based on the calculation by verifying the production records, total number of workers worked and in/out vehicle movement records, there was no unrecorded work and undeclared sub-contracting.	
Are any sub-contractors used?	Yes	
Sub-contractor 1	**Processes subcontracted**	Dyeing
	Name of factory	S.M Dyeing Works
	Address	No-4/154, T.Sellandipalayam, Karur – 639003
	Dates used	30/12/2024
Sub-contractor 2	**Processes subcontracted**	Dyeing
	Name of factory	Wintex Processing Mills
	Address	No-165, Paper Mill Road, Palliapalayam, Erode – 638006
	Dates used	30/04/2025
Sub-contractor 3	**Processes subcontracted**	Weaving
	Name of factory	Senthil Murugan Tex
	Address	No-4, Selvanagar, 1st Street, Vengamedu, Karur – 639006
	Dates used	14/06/2025

← Code area 8.A

Code area 9 →

Sub-contractor 4	**Processes subcontracted**	Weaving
	Name of factory	Sri Adanjaaramman Tex
	Address	Semmai Nagar, Vellkovil – 638111
	Dates used	13/06/2025
Sub-contractor 5	**Processes subcontracted**	Printing
	Name of factory	Sri Sai Textile Printers
	Address	No-102, Porappan kadu, Manicampalayam, Erode – 638004
	Dates used	23/12/2024
Sub-contractor 6	**Processes subcontracted**	Printing
	Name of factory	Wintex Printing Mills
	Address	R.S.No. 102/3C, Karuvilparai Valasu, Erode - 638107
	Dates used	14/06/2025

← Code area 8.A
Code area 9 →

9. No harsh or inhumane treatment is allowed

Management systems

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

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	Management systems for “Harsh or Inhumane treatment” is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy of “Anti Harassment and abuse dated 01/06/2024 and Disciplinary / Grievance Handling” dated 01/06/2024 is in place. The policy explicitly forbids any form of physical or psychological abuse, harassment, or degrading treatment in the workplace. Policy / Procedure is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) Management Representative is directly responsible for creating a work environment where all employees are treated with respect and dignity. Also, responsible for the protection of workers from physical, emotional, or verbal abuse. c) Policy on Zero abusement, No inhumane Treatment is displayed and is easily accessible to all employees. Periodic refresher training for all employees is provided (last on 15/03/2025) covering this policy and Company Policies on 01/06/2024. However, it is noted during the audit process that understanding level on this workplace requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as, to ensure that all employees understand what is considered unacceptable behaviour, how to report issues, and how to contribute to a respectful and supportive workplace, is not adequate. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done to detect any violations of the policy, track the effectiveness of corrective actions and ensure that all employees are treated with respect and dignity.However, during internal audit, the Management Representative team failed to identify the below points. During the factory tour it was noted that the factory has not posted certified standing order for the employees reference.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 8.A

Code area 10.A →

9. No harsh or inhumane treatment is allowed	9.C Implement, adopt and communicate to all w...	Local law	NC	ZAF600986867

Systems and evidence examined to validate this code section	1. The company has a documented disciplinary practice and follows the laws of the land on this matter (Industrial Disputes Act and the Industrial Employment Standing Orders Act). 2. No Case of any Disciplinary Action taken against any worker the same was verified through the sampled worker interview. 3. No deductions for disciplinary purpose are imposed anytime within the facility. Confirmed through worker's interview. 4. The Organisation treats all its personnel with dignity and respect. The company does not engage in or Tolerate the use of corporal punishment. 5. Facility provide access to a confidential grievance mechanism for all workers and the grievance mechanism include a provision for non-retaliation and does it allow workers to report issues anonymously. However, factory has not posted certified standing order for the employees reference. Evidence examined 1. Anti-Sexual harassment policy 2. Zero abuse policy 3. Worker Interview 4. Management interview 5. Anti-Sexual Harassment Committee records

← Code area 8.A

Code area 10.A →

Findings: non-compliances

ZAF600986867

Non-compliance

Due 2025-07-26

Code area

9 No harsh or inhumane treatment is allowed

Workplace requirement

9.C Implement, adopt and communicate to all workers a disciplinary policy, and procedures that are fair and appropriate.

Issue title

579 - Lack of a detailed disciplinary procedure that has been communicated to all workers

Description

During the factory tour it was noted that the factory has not posted certified standing order for the employees reference.

Status

Closed (2025-07-17)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Corrective and preventative actions

It is recommended that the factory shall display the copy of Certified Standing Order in the facility for workers reference.

Local law reference

In accordance with Tamil Nadu Government Gazette Notification No. G.O.Ms.No. 2272, Labour dated 11th November 1986, every industrial establishment where in less than 50 workers and not less than 20 workers are employed on any day of the preceding 12 months, the factory is required to prepare standing orders and get it certified by labor commissioner. A copy of the certified standing orders in English as well as in a language understood by the majority of the workers shall be displayed on a notice board near the entrance or at a place visible to the employees.

* PDF generated at 09:10 (UTC) on 17 Jul 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 9

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	1. Facility provide access to a confidential grievance mechanism for all workers and the grievance mechanism include a provision for non-retaliation and does it allow workers to report issues anonymously. 2. The Organization has constituted an Anti – Sexual Harassment Committee constitutes of elected members, which meets once in 3 months. Meetings are held on 02/05/2025 NGO – Centre for Rural Development Trust participating the Meeting and leading the Committee effectively. 3. Factory has provided suggestion / Complaint box to report any violation anonymously and factory has formed Internal Compliance Committee
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9 Code area 10.A →

10.A. Environment 2-Pillar

Management systems

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

← Code area 9

Code area 10.B →

Management systems

Explanation for management systems grades	Management systems for "Environment" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the Environment Policy dated 01/06/2024 and Environmental Aspect Impact assessment dated 01/01/2025 for identifying aspects and environmental impact of its own operations. Policy commits to minimize the environmental impact of the company's operations and to Promote environmental awareness among employees. Policy is appropriate for the site context and is in compliance with the Workplace Requirements in the Base Code Area. b) Management Representative is directly responsible for ensuring that environmental objectives are met and that sustainable practices are followed throughout the organization. Also, responsible for reducing environmental impacts. c) Policy on Environment is displayed and is easily accessible to all employees. Periodic refresher training for all employees is provided 15/03/2025 covering this policy and Company Policies on 01/06/2024. However, it is noted during the audit process that understanding level on this environmental requirement is not adequate among employees. Ability to measure how well the training programs are achieving their intended outcomes, such as, Waste handling, types of waste and Environmental aspect and impact is not adequate. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule and Internal audit checklist is maintained covering all workplace requirements of this base code. Demonstration to make sure that the procedures are implemented is done to monitor environmental performance, comparing it against set goals or targets, and taking corrective actions when needed. However, during internal audit, the Management Representative team failed to identify the below points. During the audit process it was noted that the factory does not have biodiversity policy in place.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 9 Code area 10.B →

Systems and evidence examined to validate this code section	1. The facility has established and maintained environmental policy & Management Representative is responsible for environmental aspects. 2. Based on management interaction, facility and their suppliers are aware of the environmental requirements. 3. No official complaints or legal recommendations found for the past years. 4. Air quality, Noise, Stack emission and Illumination test conducted through MK Enviro Solutions on 05/07/2024 5. No Hazard waste produced by the factory. Evidence examined 1. Documented Policy on Environment 2. Appointment of responsible person for Environment Implementation 3. Environmental training records 4. Environmental Test reports

← Code area 9

Code area 10.B →

10.A. Environment 2-Pillar

Data points

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

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.B. Environment 4-Pillar	10.B.I Monitor and mitigate the site's impact...	Base code	NC ZAF600986868

Systems and evidence examined to validate this code section	1. The facility has established and maintained environmental policy, MR is responsible for environmental aspects. 2. Based on management interaction, facility and their suppliers are aware of the environmental requirements. 3. No official complaints or legal recommendations found for the past years. 4. Documented Policy on Environment 5. Appointment of responsible person for Environment Implementation 6. Electrical waste disposal agreement with Tritech Systems dated on 17/06/2025 and valid upto 16/06/2026. 7. Used/Waste oil waste disposal agreement with Saizrol Industries dated on 17/06/2025 and valid upto 16/06/2026. Evidence examined 1. Documented Policy on Environment 2. Aspect and Impact register 3. Environmental Monitoring Analysis 4. Appointment of responsible person for Environment Implementation 5. Fuel, water monitoring Analysis

← Code area 10.A

Code area 10.C →

Findings: non-compliances

ZAF600986868

Non-compliance

Due 2025-08-25

Code area

10.B Environment 4-Pillar

Status

Open*

Workplace requirement

10.B.I Monitor and mitigate the site's impacts on biodiversity.

Time given to resolve

60 days

Issue title

652 - Site does not have a biodiversity policy in place contrary to law

Verification method

Desktop audit

Description

During the audit process it was noted that the factory does not have biodiversity policy in place.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

It is recommended to the facility shall ensure biodiversity policy in place.

* PDF generated at 09:10 (UTC) on 17 Jul 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 10.B

Code area 10.C →

10.B. Environment 4-Pillar

Data points

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

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)

← Code area 10.B

Code area 10.C →

Total electricity consumption from non-renewable sources (kWh)	16,535	15,600
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	Municipality Water	Municipality Water
Has the site completed any carbon footprint analysis?	No	No
Water sources	Municipal Water	Municipal Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	140,500	135,500
Water discharged	Drainage, Cesspit	Drainage, Cesspit
Water volume discharged (m3)	131,200	122,500
Water volume recycled (m3)	0	0
Total waste produced (mt)	5,700	5,320
Total hazardous waste produced (mt)	0	0

← Code area 10.B

Code area 10.C →

Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	56,650	51,270

← Code area 10.B

Code area 10.C →

10.C. Business ethics

Management systems

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

← Code area 10.B

Management systems

Explanation for management systems grades	Management systems for "Business Ethics" is reviewed and the following MSA is assigned for this code section a) The Facility has developed the policy for this Workplace Requirements within this Base Code Area. Anti-bribery Policy dated 01/06/2024 is in place. Corruption Risk assessment for assessing the risks of bribery, corruption or any fraudulent or unethical business practices is in place and implemented the measures to mitigate these risks. b) Management Representative is directly responsible for ensuring that employees and other stakeholders adhere to high standards of honesty, integrity, and fairness in business activities. Also, responsible for creating and maintaining an environment where ethical behaviour is prioritized, supported, and rewarded. c) Policy on anti-bribery / anti-corruption is displayed and is easily accessible to all employees. Periodic refresher training for all employees is provided (last on 15/03/2025) covering this policy. d) The facility had conducted Internal audit on 08/03/2025 and as per audit schedule but No demonstration to make sure that the procedures are implemented effectively to monitor potential violations

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 10.B

Systems and evidence examined to validate this code section	1. Warehouse Manager is responsible for implementing standards concerning Business Ethics 2. Facility has established Business ethics Policy 3.Facility has established Anti-Bribery Policy Evidence examined 1. Anti-Bribery policy and business ethics policy 2. Appointment letter of Designated person responsible for Implementing standards concerning business ethics. 3. Interaction with the management staff 4. Anti-Bribery Training records

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	The factory does not have any certified anti-bribery Management Systems

← Code area 10.C

Attachments

[Factory Photographs - Sri Eesan International.pdf]

[Signed CAPR - Sri Eesan International.pdf]