



SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1027223	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1028866
Business name (Company name):	Eve Dress-Shirts' Limited		
Site name:	Eve Dress-Shirts' Limited		
Site address:	Holding # 219, Anowar Jung Road, Ward # 05, Block # A, Ashulia Savar, Dhaka Ashulia, Savar, Bangladesh 1341 BD	Country:	BD
Site contact and job title:	Rajib Kumar Datta / Manager - Compliance, HR & Admin Department		
Site phone:	0088027741720	Site e-mail:	abrar.evegroup@gmail.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-12-26		

Audit Company Name:
GCL International

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	08:50	In	09:15
	Out	17:30	Out	16:00
Audit type:	PERIODIC			
Was the audit announced?	SEMI_ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Rajib Kumar Datta / Manager - Compliance, HR & Admin Department			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	There was No Union in the factory		
<i>Reason for absence during the audit</i>	There was No Union in the factory		
<i>Reason for absence at the closing meeting</i>	There was No Union in the factory		


Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0B - Management systems and code implementation</u>	0.B.1 0.B.1		2	0	0	NC - ZAF600261902 NC - ZAF600261903
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.3	§1 §2 §3 §4	4	0	0	NC - ZAF600307398 NC - ZAF600307399 NC - ZAF600307400 NC - ZAF600307401
<u>10B4 - Environment 4-pillar</u>	10.B4.1 10.B4.2 10.B4.5	§5 §6	3	0	0	NC - ZAF600307402 NC - ZAF600307403 NC - ZAF600307404
<u>5 - Living wages are paid</u>			0	0	1	GE - ZAF600307405

Local Law Issues


Issue	Description
§1	In accordance with Bangladesh Labour Rules 2015, Schedule -15, Inside each toilet of the ladies there must be covered bin box and this must be cleaned every day.
§2	In accordance with Building Construction Act 1952, 3 (a): No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction.
§3	In accordance with Bangladesh Labour Rules 2015: Rules 55,10: If possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable fire-repellent instruments. And the security has to be ensured by dividing the trained workers into fire-fighting team, rescue team and first aid team (6% members in each team) and the records related herewith have to be preserved in accordance with Form- 22.
§4	In accordance with Bangladesh Labor Rules 2015 Section 58(7), all the electric wiring and switch boards must be complete by the non-passing elements through 'conceal wiring'.
§5	In accordance with Bangladesh Labour Law-2006, Section 54. Disposal of wastes and effluents. Effective arrangements shall be taken in every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.
§6	In accordance with Bangladesh Energy Regulatory Commission Act, 2003, Section-27(a): Licence. - (1) No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as: (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) Energy storage.

Corrective Action Plan - Non Compliances

Non-Compliance		Evidence																																		
[Back to findings summary]																																				
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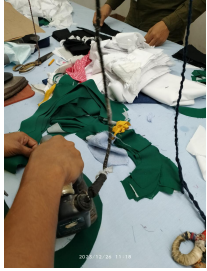
Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600307398	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	333 - Sanitary facilities (e.g. toilets) are inadequate / unavailable to people with disabilities	
Subcategory	Hygiene Facilities & Housekeeping	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Bangladesh Labour Rules 2015, Schedule -15, Inside each toilet of the ladies there must be covered bin box and this must be cleaned every day.	
ETI code	3.3 - Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.	
Explanation to the non compliance	It was observed during the site tour and interview with workers & management that 08 out of 12 female toilets, located at 3rd & 4th floor of the main production building, found to be with waste bins without cover as per their legal requirement.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility management shall provide cover for the waste bins in female toilets and ensure to monitor them regularly.	
		 <u>NC - Waste bins without cover or lid in female workers toilet.jpg</u>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600307399	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	250 - No or inadequate assessment / certificates / report / licence in place for structural safety of building including building stability certificate	
Subcategory	Building/Site Maintenance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
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Local law issue	In accordance with Building Construction Act 1952, 3 (a): No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was observed during the site tour and document review and interview with management, that the factory has overall 07 buildings and 02 sheds. The factory did not obtain construction approval from a competent person (approved civil engineer) instead they had obtained building construction approval from the Chairman of Ashulia Union Porishod, on 31 January 2023.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility management shall obtain building construction approval from the approved civil engineer, who is a competent authority, as per the	


	law requirement.	
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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600307400	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	175 - Workers are not given appropriate fire safety, fire prevention and/or evacuation training	
Subcategory	Fire Safety - Licenses, Inspections & Training	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> Costs <input type="checkbox"/> Other <input checked="" type="checkbox"/> System <input type="checkbox"/> Lack of workers	
Root cause - Other		
Local law issue	<p>In accordance with Bangladesh Labour Rules 2015: Rules 55,10: If possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable fire-repellent instruments. And the security has to be ensured by dividing the trained workers into fire-fighting team, rescue team and first aid team (6% members in each team) and the records related herewith have to be preserved in accordance with Form- 22.</p>	
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Explanation to the non compliance	<p>It was observed during workers interview and document review that 8 out of 10 fire fighters were not able to clearly explain the usage of different kinds of fire equipment such fire extinguishers, fire hose, etc. Also, fire fighters and rescuers were not aware about their roles and responsibilities if there is any fire occurrence or any emergency arise in the factory.</p>	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/>	

	365 days	Other	
Actions	The facility management shall ensure training provided to fire fighters are effective and also check their awareness of fire safety regularly as prescribed by law.		

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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600307402	
Clause	10B4 - Environment 4-pillar	
Issue Title	618 - No permits for waste disposal as per legal requirement	
Subcategory	Waste Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	10.B4.5 - Suppliers shall be aware of the significant environmental impact of their site and its processes.	
Explanation to the non compliance	<p>It was observed during the document review and management interview that the facility maintains a waste disposal agreement with a third-party company (Ms. Five Stars Enterprise) from 10 March 2020, valid for 5 years. And the facility disposes both hazardous & non-hazardous wastes like fabric, carton box, poly bag, metal, used chemical containers, used/waste machine oil to that third party company and maintains manifest like delivery challan and gate pass with them. However as reviewed the documents of that third party company, there was no evidence maintained by the facility that this third party is an authorized person to collect, transport, store & dispose the waste, collected from the facility. This third party company did not obtain & maintain a valid permit from the Environment Ministry of Bangladesh.</p>	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	<p>The facility shall dispose both hazardous & non hazardous wastes only to the thiry party company, who are authorised / permitted by the Environment Ministry of Bangladesh to collect, transport, store, handle & dispose. And maintain valid agreement and manifest for disposal with the authorised company only.</p>	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600307403	
Clause	10B4 - Environment 4-pillar	
Issue Title	624 - Employees not trained in waste management	
Subcategory	Waste Management	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Bangladesh Labour Law-2006, Section 54. Disposal of wastes and effluents. Effective arrangements shall be taken in every establishment for disposal of wastes and effluents due to manufacturing process carried on therein.	
ETI code	10.B4.2 - Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.	
Explanation to the non compliance	It was observed during the site tour and management interview that the facility did not segregate, identify and store the hazardous and non-hazardous waste materials such as plastics, fabrics, metals etc., in the designated two waste storage room located at the ground floor of the main production building.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility management shall ensure that wastes collected are segregated, identified & stored in the designated area and the workers handling the waste are trained regarding the handling of waste.	
		 <p><u>NC - Waste not segregated, identified & stored appropriately.jpg</u></p>

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600307404	
Clause	10B4 - Environment 4-pillar	
Issue Title	606 - Environmental certifications or environmental management systems documentation were not available to review	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Bangladesh Energy Regulatory Commission Act, 2003, Section-27(a): Licence. - (1) No person shall engage himself in the following business unless he is empowered by a licence or exempted from having it under this Act or any other Act, such as: (a) power generation; (b) energy transmission; (c) energy distribution and marketing; (d) energy supply; and (e) Energy storage.	
ETI code	10.B4.1 - Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.	
Explanation to the non compliance	It was observed during the site tour and document review and management interview that the facility has 4 generators (3 gas + 1 diesel) and the following issues were identified: (a) 2 out of 3 gas generators with the power generating capacity (1000 kW + 400 kW) do not have the CPP (Captive Power Plant) license for their captive power plant. Note: the facility had applied for ECC (Environmental Clearance Certificate) on 17 Jan 2023 to the concerned authority; after receiving the ECC, the facility will be eligible for applying for the CPP (Captive Power Plant) license for the 2 gas generators. (b) 1 out of 1 diesel generator with the power generating capacity (320 kW) do not have waiver certificate as per law requirement. However the facility has applied to the concerned authority on 31 January 2023, but waiver certificate not yet received.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days	

	<input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The facility shall obtain & maintain ECC (Environmental Clearance Certificate), CPP (Captive Power Plant) license and Waiver certificate from the concerned authority.	

Corrective Action Plan - Good Examples

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600307405	
Clause	5 - Living wages are paid	
Issue Title	453 - All workers receive wages well above the legal minimums	
Subcategory	Payment of Wages	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility provide taka 500 as attendance bonus to all workers' based on the workers' full attendance in a month.	
Evidence	Verified past 12 month wage records and confirmed.	

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Anandhi GCL	APSCA Number:	21703347
Additional Auditors:	Nelufar Bano		21703707
	Mir Jobair		21705285
Date of declaration:	2023-12-27		

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

Site Representation	
Full Name:	Rajib Kumar Datta
Title:	Manager - Compliance, HR & Admin Department
Date of declaration:	2023-12-27
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
<p>Totally 4.5 Manday audit Day 1 - 3 Auditors * 1 manday Day 2 - 2 Auditors * 0.75 manday</p>	

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a “root cause”

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.



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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

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