

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

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

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

Included in a 2-Pillar audit:

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

Included in a 4-Pillar audit:

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

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

Audit and site details

Audit details

Sedex company reference	ZC1027223	Auditor company name	GSCS International Ltd
Date of audit	2024-12-23	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1028866	Site name	Eve Dress-Shirts' Limited
Business name	Eve Dress-Shirts' Limited	Site address	1341 Holding # 219, Anowar Jung Road, Ward # 05, Block # A, Ashulia Savar, Dhaka, Ashulia, Savar, Bangladesh, BD
Site phone	0088027741720	Site email	abrar.evegroup@gmail.com

Audit parameters

Time in and out	Day 1	
	In	09:20
	Out	17:10
Audit type	Full initial	
Was the audit announced?	Semi announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Rajib Kumar Datta / Manager- Compliance, HR & Admin	
Any conflicting information SAQ/Pre-Audit Info	No	
Is further information available?	No	

Audit attendance

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

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> 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. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	None		
Lead auditor	Akil Mahmud	APSCA Number	32200701
Additional auditor	Md. Tanvir Hasan Khan	APSCA Number	32200442
	Md. Shamim Hossain	APSCA Number	32400342
	Md Hasibul Haque	APSCA Number	32400343
	Md. Mostafizur Rahman	APSCA Number	32200934
Date of declaration	2024-12-23		

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	Rajib Kumar Datta
Title	Manager- Compliance, HR & Admin
Date of declaration	2024-12-23





































Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...	§1	NC ZAF600766538
	3.H Where identified as necessary to reduce r...	§2	NC ZAF600766539
	3.L Implement effective processes to manage f...	§3	NC ZAF600766540
	3.L Implement effective processes to manage f...	§4	NC ZAF600766541
	3.L Implement effective processes to manage f...	§5	NC ZAF600766542
	3.L Implement effective processes to manage f...	§6	NC ZAF600766545
	3.L Implement effective processes to manage f...	§7	NC ZAF600766548
5. Legal wages are paid	5.H Comply with all other applicable laws tha...		GE ZAF600766543
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...		NC ZAF600766544
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§8	NC ZAF600766546
	10.A.B Comply with relevant local, regional a...	§9	NC ZAF600766547

Local law issues

§1	The Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1): (1) No person shall engage himself in the following business unless he is empowered by a license 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.
§2	In Accordance with Bangladesh Labour Rule 2015, Rule 67 (1&2): In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. 3) No worker can be employed in the relevant works without ensuring safety and health protection measures and the training related therewith. In addition, personal safety equipment must be preserved in accordance with Information Form-23.
§3	The National Building Code 2020, Part IV, Chapter 4, Clause 4.2: General area of application shall be Fire class A. Fixed type fire hydrant system comprises of, stand pipes and hose or reel pipes, sprinklers, drenchers or similar devices in appropriate combinations of these and capable of discharging water in an area which to be extinguish.
§4	In accordance with Bangladesh Labour Law 2006, Section 62 (5): (5) In every establishment, the clearly audible whistle shall be provided to alarm every worker employed therein in case of fire or danger.
§5	In Accordance with The Bangladesh Labour Rules 2015, Rule 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."
§6	In accordance with the Bangladesh Labour Act, 2006, Section 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.
§7	In accordance with Bangladesh National Building Code 2020, Part- 04, Section-4.6.1 (b): The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants
§8	The Bangladesh ECR 2023 Rule 6 (4): Green, Yellow, Orange and Red class new industrial establishments will not be able to start trial production or projects without obtaining environmental clearance.
§9	In accordance with The Bangladesh ECR 2023 Rule 21 (1): Each Environmental Clearance Certificate shall have to be renewed at least thirty days before expiry of its validity period.

Management systems

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



Not addressed



Fundamental improvements required







Some improvements recommended



Robust management systems

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

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems

Site details

Company and site details

Sedex company reference	ZC1027223	
Sedex site reference	ZS1028866	
Company name	Eve Dress-Shirts' Limited	
Business ownership type	GOODS	
Site name	Eve Dress-Shirts' Limited	
Site name in local language	-	
GPS location	GPS address	Holding # 219, Anowar Jung Road, Ward # 05, Block # A, Ashulia, Savar, Dhaka
	Coordinates	23.89104,90.3238467,
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Rajib Kumar Datta
	Job title	Manager- Compliance, HR & Admin
	Phone number	0088027741720
	Email	abrar.evegroup@gmail.com
Applicable business and other legally required business license numbers and documents	<p>Factory License No.: 12706/Dhaka Issued by Bangladesh Government, Valid up to 30 June 2025.</p> <p>Trade License No.: 002919 Issued by Ashulia Union parishad which is valid up to 30 June 2025.</p> <p>Fire License No.: DD/Dhaka/27965/2018 Issued by Bangladesh Government, which was expired on 30 June 2024.</p> <p>Certificate of Incorporation No.: C-126659/2015 Issued by Bangladesh Government from 3rd November, 2015.</p>	

Site activities

Site function	Factory Processing/Manufacturer
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Site activities

Site activities	Primary	Manufacture of wearing apparel (clothing), except fur apparel
	Secondary	Manufacture of knitted and crocheted apparel
	Other	
Product type	All kind of Woven (Shirt) item	
Process overview	All kind of Woven (Shirt) item Cutting Sewing , Embroidery, Finishing and Packing Total production line 15 sewing line and Main equipment's :PLAIN SEWING MACHINE , PLAIN MACHINE (ZIG ZAG), Vertical PLAIN Machine , TWO NEEDLE PLAIN MACHINE , SNAP BUTTON MACHINE, RIB CUTTER MACHINE , CUTTING MACHINE , BARTACK MACHINE , BUTTON STITCH MACHINE, FEED OF THE ARM, OVER LOCK MACHINE, FLATE LOCK MACHINE.	
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?	13418m ²

Site scope

Building 1	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	7
	Description of floor activities	<p>Ground Floor: Embroidery, Sample Section, Management Information System, MIS room, Cutting Section, Cutting Manager Moors, Fabrics Inspection room, Fusing Room, Office Room, Bonded Warehouse, Office Room, Material Management Department, Compliance Office, Medical Room, Admin Office, Time Section</p> <p>First Floor: Sewing, Finishing, Spot removing Room, Maintenance room</p> <p>Second Floor: Spot Removing Room, Maintenance Room, Sewing, Finishing, Spot removing Room, Maintenance room, Chemical Store, Laboratory.</p> <p>Third Floor: Fusing Section, Packing Section, Finished Goods Store, Bonded Warehouse, Accessories Store, Training Room (Sewing), Inspection Room.</p> <p>Forth Floor: Sewing, Finishing, Spot removing Room, Maintenance room</p> <p>Fifth Floor: Cutting Section, Idle machine Store, Finished goods store, Canteen, Dining.</p> <p>Sixth Floor: Office & roof</p>
Building 2	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	<p>Ground Floor: Fire Control Panel, Parcel Screening/Waiting Room, Fire Pump Room, Childcare Room</p>

Site scope

Building 3	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	4
	Description of floor activities	Ground Floor: Generator Room, Sub-station Room First Floor: Vacant Second Floor: Store Third Floor: Vacant
Building 4	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Ground Floor: Boiler Room
Building 5	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Ground Floor: Compressor room
Building 6	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Ground Floor: Security Room
Building 7	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Cooling pump room

Site scope

Building 8	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Kitchen
Building 9	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed 1: Workshop
Building 10	Last construction works on site	2006
	If building is shared, provide details	No
	Number of floors	1
	Description of floor activities	Shed 2: Water reservoir.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No	
Does the site organise worker transport to the worksite?	Not provided	Site did not provide any transportation and it is not required by local law.

Work patterns

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

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

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? Other certification, Other social audit
Wrap
BSCI
GOTS
Oeko-tex

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
During current assessments, it was noted the site had not any negative impacts on them 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 facility did not have Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	533 (34%)	1035 (66%)	- -	1568 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	533 (34%)	1035 (66%)	- -	1568 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	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	209 (13.3%)	312 (19.9%)	- -	521 (33.2%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	The facility did not have any peak season
Please list the nationalities of all workers, with the three most common nationalities listed first	Bangladeshi

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Bangladeshi	34%	66%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	533 (34%)	1035 (66%)	- -	1568 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	533 (34%)	1035 (66%)	- -	1568 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details 0

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	85 (5.4%)	5 (0.3%)	- -	90
Supervisors or team leaders	60 (3.8%)	0 (0%)	- -	60
Administrative staff	99 (6.3%)	4 (0.3%)	- -	103

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	8 groups of 4 persons
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes
Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) During worker interview no complaints have been raised by the workers. They are happy and satisfied with the working environment.
What did the workers like the most about working at this site?	Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Freedom of movement Overtime Social activities and events Pay Grievance mechanisms Equal opportunities Hours worked, rest days or breaks Job security Workplace benefits (e.g. child care provisions)
Additional comments	Not Applicable
Attitude of workers' committee/union representatives	During Interview, the worker committee representatives expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary
Attitude of managers	The management was found to be well versed with the requirements of social audit, management was very co-operative and transparent during the course of the audit. They were receptive towards findings. The management approach was found to be positive.

Workers interviewed by type

	Total
Permanent workers	52
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	52

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	11	21	-	32
Workers interviewed individually	7	13	-	20

Migrant workers interviewed

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

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	18.0%	9.8%	-	12.6%
Last full calendar year (2023)	17.3%	15.7%	-	16.3%
Previous full calendar year (2022)	14.6%	13.2%	-	13.7%

* 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)	7.7%	7.1%	-	7.3%
Last full calendar year (2023)	17.3%	16.2%	-	16.6%
Previous full calendar year (2022)	17.3%	15.7%	-	16.3%

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

Are accidents recorded? Yes
 Accidents are recorded by nurse and first aiders

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

	Men	Women	Other	Total
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Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

Lost day work cases (per 100 workers)*

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

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

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

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

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

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

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

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>- The facility ensures auditors have unrestricted access to all necessary documents, interviewees, and areas, including outbuildings and accommodations. Historical records confirm that no obstructions have been reported.</p> <p>- The facility has robust anti-bribery policies in place, prohibiting any form of bribery or threats towards auditors. All personnel are trained on these policies to ensure ethical interactions with auditors.</p> <p>- The facility maintains an accurate site description and Sedex site profile, which are regularly updated. These documents are verified against actual site conditions to ensure consistency.</p> <p>- A comprehensive human rights policy statement, approved by senior management, is actively communicated and trained to all relevant personnel. Implementation of this policy is regularly reviewed for effectiveness.</p> <p>Evidence Examined:</p> <ol style="list-style-type: none"> 1. Factory in out register 2. Anti Bribery Policy 3. Management Interview 4. Documents review 		

0. Enabling accurate assessment

Data points

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

1. Employment is freely chosen

Management systems

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

Management systems

Explanation for management systems grades

Clear Rules About Voluntary Employment:

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

Workers Keep Their Personal Documents:

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

Freedom to Leave the Job:

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

Regular Training and Awareness:

The factory provides regular training to both workers and managers about workers' rights to choose their employment freely. This training covers the factory's rules against forced labor and explains workers' rights to leave their jobs. New workers learn about these rights when they start, and training is repeated regularly. Last training conducted on 04.12.2024.

Fair Hiring Practices:

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

Clear Employment Contracts:

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

Easy Way to Report Problems:

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

Responsible person:

Rajib Kumar Datta, Manager (Compliance, HR & Admin) is responsible for implementing the code.

Regular Checks and Audits:

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

Continuous Improvement:

The factory constantly reviews and updates its policies based on feedback from workers, audits, and changes in laws or standards. This helps keep the system effective, fair, and up-to-date to protect workers' rights. Last internal audit conducted

Management systems

on 09.07.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

- The facility has established a clear policy against forced labour, human trafficking, and debt bondage. Audits and compliance checks confirm that these practices are not present.
- The facility's code of conduct strictly prohibits any form of coercion, threats, or inhumane treatment. Records and employee feedback support the effective enforcement of these standards.
- Workers are allowed to freely leave the workplace and living areas, with reasonable restrictions only for safety reasons. Inspections confirm that this policy is actively followed.
- Surveillance practices are regulated to avoid excessive monitoring or intimidation. The use of CCTV and other surveillance methods is justified and aligns with privacy standards.
- Workers are free to communicate and interact both inside and outside the workplace. There are no restrictions on social interaction or intentional isolation.
- The facility does not retain workers' original passports or identity documents. Safe and documented storage options are provided for personal items, ensuring workers have unrestricted access.
- Workers can resign without incurring any fees and receive all due wages and benefits. Policies ensure compliance with legal requirements, and records confirm proper handling of resignations.
- Workers are paid according to a regular schedule that meets legal requirements. Payroll records show that payments are timely and in line with applicable laws.
- The facility ensures fair compensation and does not place workers in debt. Any loans or advances are minimal and beneficial, with terms agreed upon by both parties.
- The facility does not require workers to post deposits or bonds. Relevant policies and payroll records confirm that no such financial burdens are imposed.
- Payments are not withheld or used for forced savings. Payroll records indicate that workers receive their earnings in full and on time verified by reviewing payroll records, worker and management interview.
- The facility ensures that workers receive at least the legal minimum wage and complies with laws regarding working hours and overtime. Compliance is verified through payroll and legal reports.
- The facility performs due diligence to prevent forced labour in third-party operations. Records of audits and assessments confirm adherence to these practices.
- Any prison labour used is entirely voluntary and complies with the ETI Base Code. Policies and compliance records validate this practice.
- The facility adheres to all relevant laws concerning the specified Code Area. Documentation and audit reports confirm full compliance with legal requirements.

Evidence Examined:
 1. Force labor Policy
 2. Child labor policy
 3. Human rights Policy
 4. Documents review
 5. Worker Interview

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

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

Management systems

Explanation for management systems grades

Clear Hiring Policies:

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

Checking Workers' Right to Work:

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

Written Contracts in a Language Workers Understand:

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

No Recruitment Fees or Hidden Costs:

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

Fair Treatment During Hiring Process:

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

Training for Recruitment Staff:

The factory provides regular training for all staff involved in hiring. This training covers responsible recruitment practices, workers' rights, and the importance of checking legal documents. It helps ensure that all recruitment is done ethically and legally. Last ETI base Code training conducted on 04.12.2024 where this code area was included in the training.

Monitoring Recruitment Agencies:

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

Easy Way for Workers to Report Problems:

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

Regular Audits and Checks:

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

Continuous Improvement:

Management systems

The factory constantly updates its recruitment policies and practices based on worker feedback, audit findings, and changes in laws or industry standards. This ensures the system stays effective, fair, and in line with best practices. Last internal audit conducted on 09.07.2024. Facility nominated Rajib Kumar Datta, Manager (Compliance, HR & Admin) is responsible for monitoring this Code & related issues.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> - As per document review, factory management representation, and workers' interview, it was observed that all workers in the factory were Bangladeshi and 100% were local workers and no permission is required for working from one district to another district. - All workers had the proper legal rights to work in this region. - All of them were recruited directly by the factory and no agency was involved in the factory's recruitment processes. - No foreign worker was used by the factory. - There were not any deductions for items such as travel and equipment. - Facility policy reflects that they will not recruit any child labor or young worker. - Facility has a anti-corruption and bribery policy where it reflects that all recruitment will be done fairly. - Facility uses own Security Guards. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Hiring procedure 2. Personnel files 3. Worker's handbook 4. Worker's interview 5. Management interview 		

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

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

Migrant workers

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

Recruitment fees

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

No

Facility Paid the all recruitment fees and costs

Were recruitment fees or costs identified during worker interviews?

No

Facility does not take any recruitment fees from workers.

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

Management systems

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

Management systems

Explanation for management systems grades

Clear Policy Supporting Freedom of Association:

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

Respect for Workers' Rights to Organize and Bargain Collectively:

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

No Discrimination or Retaliation:

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

Regular Training for Managers and Supervisors:

The factory provides regular training to all managers and supervisors about the rights of workers to associate freely and bargain collectively. This training helps ensure that management knows how to support these rights and handle related matters fairly and respectfully. Last ETI base Code training conducted on 04.12.2024 where this code area was included in the training.

Open Communication Channels:

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

Support for Worker Representatives:

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

Easy Way for Workers to Report Issues:

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

Regular Review and Audits:

The factory regularly reviews its policies and practices to make sure they are up-to-date and in line with laws and best practices on freedom of association and collective bargaining. Independent audits are also conducted to check compliance and identify areas for improvement. Last internal audit conducted on 09.07.2024.

Support for Collective Bargaining Agreements:

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

Continuous Improvement:

Management systems

The factory continuously improves its management system based on worker feedback, audit results, and changes in labor laws. This ensures that the system remains effective and supportive of workers' rights to freedom of association and collective bargaining.

Rajib Kumar Datta, Manager (Compliance, HR & Admin) is responsible to look after Freedom of association and right to collective bargaining are respected sections.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>-All the employees can form or join the trade union of their choice. They are well aware about the legal requirement regarding trade union and collective bargaining agreement.</p> <p>-There is a workers participations committee in the facility, this committee formation was on 20-05-2024.</p> <p>-Last Participation Committee meeting is held once in two months. Last meeting was held on 28-10-2024.</p> <p>-Meeting minutes are posted in notice board and recorded in a register.</p> <p>-There is total 18 members in the participation committee (12 from Worker side & 6 from Management Side)</p> <p>- All the workers are well aware of the Participation Committee members.</p> <p>-Participation Committee members are not treated less favorably than other workers.</p> <p>-Participation Committee members can carry out their duties within working hours without affecting their pay.</p> <p>- The facility adheres to all relevant laws concerning the specified Code Area. Documentation and audit reports confirm full compliance with legal requirements.</p> <p>Evidence Examined:</p> <ol style="list-style-type: none"> 1. Freedom of association policy review 2. Facility management interviews 3. Worker interview 4. Complain box register (Suggestions from the complaint box and actions taken) 5. Committee formation record review and its meeting records review, Grievance handling policy & procedure. 		

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Not Applicable
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

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Health and Safety Policy:</p> <ul style="list-style-type: none"> The factory has a clear policy that prioritizes the safety and health of all workers. This policy includes guidelines on safe working practices, the use of protective equipment, and emergency procedures. It is communicated to all workers and supervisors. <p>Regular Safety Inspections and Risk Assessments:</p> <ul style="list-style-type: none"> The factory conducts regular safety inspections and risk assessments to identify potential hazards. These checks help find and fix any unsafe conditions or equipment quickly, preventing accidents. Last risk assessment date 24.07.2024. <p>Proper Safety Equipment and Training:</p> <ul style="list-style-type: none"> All workers are provided with the necessary PPE (like gloves, helmets, masks) and are trained on how to use them properly. Last training on PPE was conducted on 10.12.2024 . <p>Responsible person: Facility has appointed Rajib Kumar Datta, Manager (Compliance, HR & Admin) for look after health & safety area.</p> <p>Regular Health and Safety Audits:</p> <ul style="list-style-type: none"> Internal audits are conducted once in every 6 months to ensure that the factory complies with all health and safety regulations and standards. This helps identify areas for improvement. Last internal audit was conducted on 09.07.2024. <p>Continuous Improvement:</p> <p>The factory continuously reviews and updates its health and safety policies and practices based on audit results, worker feedback, and changes in regulations to keep improving safety conditions. They need to improve their monitoring because there was some NC which is mentioned in the workplace requirement.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...	§1	NC	ZAF600766538
	3.H Where identified as necessary to reduce r...	§2	NC	ZAF600766539
	3.L Implement effective processes to manage f...	§3	NC	ZAF600766540
	3.L Implement effective processes to manage f...	§4	NC	ZAF600766541
	3.L Implement effective processes to manage f...	§5	NC	ZAF600766542
	3.L Implement effective processes to manage f...	§6	NC	ZAF600766545
	3.L Implement effective processes to manage f...	§7	NC	ZAF600766548

Systems and evidence examined to validate this code section

1. General Health and Safety Management
 - Rajib Kumar Datta, Manager-HR, Admin & Compliance - looks after Health & Safety issues for the site.
 - Potable water was freely available in all areas.
 - Sufficient clean toilets 254 (105 for male and 149 for female) segregated by gender were available at all times for workers.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Facility doctor and medical assistant maintains injury register for the injuries occurred in the facility.
 - Facility has conducted root cause analysis for all the individual injury occurred.
 2. Fire Safety
 - Sufficient assembly area was found in front of the facility building.
 - Firefighting equipment was adequate and checks were up-to-date.
 - The facility management posted the evacuation plans on production floors with local language.
 - Public Address System and Fire Alarm System were available in all areas.
 4. Electrical, Machine & Fire Safety
 - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - Facility checks all electric channels, distribution board and electric connection daily and monthly schedule wise.
 - Facility maintains a scheduled maintenance plan for doing maintenance of all machines.
 - All the machineries are safely guarded.
 5. Chemical safety
 - Facility uses Spot Lifter 833, Acetone, Machine oil, Diesel for their Production process.
 6. Medical services
 - There were 26 first aid boxes with sufficient kits in the full facility.
 - Facility has appointed 01 doctor, 01 nurse & 01 Medical Assistant who are available in working time of the facility.
 - Facility has a medical room.
 7. Dormitory
 - Facility didn't provide dormitory facilities to any employees.
 8. Fire drill:
 - Internal Day Fire Drill conducted on 31.08.2024, Total 1708 (653 male & 1055 female) person was present duration 2 minute 58 Second.
 - Fire Drill External conducted on 05.11.2024, Total 1757 (679 male & 1078 female) person was present, Duration 2 minute 58 Second.
 09. Risk assessment
 - Facility conducts risk assessment twice in every year and if any new process or machine is added. Risk assessment was last conducted on July 2024.
 11. Safety committee:
 - Facility has formed a safety committee as per legal requirement.
 - Total member of safety committee are 10 (5 from worker side and 5 from management side).
 - Last meeting was conducted on 21-10-2024 which is in line with legal requirement.
- Evidence examined:
1. License review (Fire license, Trade license, Factory license)
 2. Building approval plan and layout approval plan
 3. Group insurance
 4. Drinking water test report
 5. Injury record and analysis report
 6. Machine and electric maintenance record
 7. Risk assessment report
 8. Training record (Fire training, First aid training, PPE training and Health and safety training)

9.Fire drill record
10.Health and safety committee register
11.Fire equipment and electric equipment checking record

Findings: non-compliances

ZAF600766538

Non-compliance

Due 2025-02-08

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

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

Verification method

Desktop audit

Description

It was noted through document review and management interview that the facility has four generators with capacity of (1000, 400, 198, 320) Kw but the facility did not have generator license of 1000 kw. however the facility have applied for the license on 17.01.2023

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that the facility shall obtain generator license from the concerned authority.

Local law reference

The Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1): (1) No person shall engage himself in the following business unless he is empowered by a license 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.

Evidence



[Application_Diesel Generator.pdf](#)



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ZAF600766539

Non-compliance

Due 2025-02-08

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement	Time given to resolve
3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).	30 days
Issue title	Verification method
277 - Workers are not issued with Personal Protective Equipment, or it is not appropriate to the risk - isolated	Desktop audit
Description	Area of non-compliance/non-conformance
It was noted through facility tour that in the buidling-1 in the Fusing section 2 out of 4 fusing operators were using torn PPE.	Local law
Corrective and preventative actions	Base code
It is recommended that the facility management should ensure all the workers are using appropriate PPE(s) during work.	

Local law reference

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

Evidence



[torn ppe.JPEG](#)



[PPE torn.JPEG](#)



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ZAF600766540

Non-compliance

Due 2025-02-08

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Issue title

189 - Inadequate hose reel installation and maintenance

Description

During floor visit it was observed that the hydrant pump was found non functional due to renovation. Note that renovation work started from 1 week back and the facility management stated that it will be completed with in 10 days.

Corrective and preventative actions

It is recommended that facility should ensure proper fire hydrant system in all over the premises.

Local law reference

The National Building Code 2020, Part IV, Chapter 4, Clause 4.2: General area of application shall be Fire class A. Fixed type fire hydrant system comprises of, stand pipes and hose or reel pipes, sprinklers, drenchers or similar devices in appropriate combinations of these and capable of discharging water in an area which to be extinguish.

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ZAF600766541

Non-compliance

Due 2025-03-10

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

191 - Fire fighting equipment signage/labelling, instructions are not sufficient in detail, language, etc.

Description

It was observed through the facility tour & management interview that the factory did not install PA system in the fabric store located at building 3,

Corrective and preventative actions

It is recommended that the factory should install PA system in the mentioned area.

Local law reference

In accordance with Bangladesh Labour Law 2006, Section 62 (5): (5) In every establishment, the clearly audible whistle shall be provided to alarm every worker employed therein in case of fire or danger.

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

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ZAF600766542

Non-compliance


Due 2025-02-08

Code area 3 Working conditions are safe and hygienic	Status Open*
Workplace requirement 3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.	Time given to resolve 30 days
Issue title 180 - No sufficiently trained person appointed to oversee fire safety, fire prevention and fire evacuation procedure (e.g. 'fire marshal') as required by law	Verification method Desktop audit
Description It was noted through site tour, documents review and management interview that the factory has 280 trained fire fighters, rescuers and first aiders trained from Bangladesh Fire Service and Civil Defence (BFSCD). where the factory required 322 fire fighters, rescuers and first aiders considering the factory manpower 1790. Noted that, facility applied for new batch training on 19.12.2024 to the concern authority.	Area of non-compliance/non-conformance Local law Base code
Corrective and preventative actions It is recommended that the factory management should ensure required number of firefighters, rescuers & first aiders trained from the respective authority	
Local law reference In Accordance with The Bangladesh Labour Rules 2015, Rule 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."	

Evidence



[Applied for Fire training Eve.pdf](#)



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ZAF600766545

Non-compliance

Due 2025-02-08

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

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

Area of non-compliance/non-conformance

Local law

Base code

Description

It was noted through facility tour that approximate 5% workers were blocked by cut panel goods in the sewing section located at the ground floor of building 1.

Corrective and preventative actions

It is recommended that the facility shall ensure all the workers are free from any obstruction in the mentioned area.

Local law reference

In accordance with the Bangladesh Labour Act, 2006, Section 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.

Evidence



[Workers blocked.JPG](#)



[bf3340aa-895b-4a64-8062-9caacddee861.JPG](#)



[4ad6a77c-bbd6-43dc-a892-b91ce5a49310.JPG](#)



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ZAF600766548

Non-compliance

Due 2025-02-08

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

192 - Absence of functional fire alarms/smoke detectors

Verification method

Desktop audit

Description

During floor visit and management it was observed that the Fire alarm system was non functional due to renovation. Note that the facility have started the work back 1 week and they have stated that it will be completed with in 10 days

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that the factory management should install the alarming system throughout the factory.

Local law reference

In accordance with Bangladesh National Building Code 2020, Part- 04, Section-4.6.1 (b): The installation of automatic fire and smoke detection system shall be a necessity when the size, arrangement and occupancy of a building become such that a fire itself cannot provide adequate warning to its occupants

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3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Machine oil Spot lifter Aceton Diesel
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 Facility does not added any floor from the original construction. Facility has collected building approval from local authority and machine layout has been collected from Department of Inspection Factories and Establishment.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy Against Child Labour:</p> <ul style="list-style-type: none"> The factory has a clear, written policy that strictly prohibits the use of child labor. This policy follows all local and international laws and standards on minimum working age. It is communicated to all workers, supervisors, and hiring agencies. <p>Strict Age Verification Process:</p> <ul style="list-style-type: none"> The factory has a reliable process to verify the age of all workers during hiring. This includes checking official documents like birth certificates, national IDs, or passports to ensure that no children are hired. <p>Remediation Plan if Child Labour is Found:</p> <ul style="list-style-type: none"> If a child is mistakenly hired, the factory has a clear remediation plan. This plan includes safely removing the child from work, providing support for their education, and ensuring their well-being, without any negative impact on the child or their family. <p>Responsible person for implementation of the policy:</p> <ul style="list-style-type: none"> -Babul Mia, Officer (Admin & Compliance) is responsible for implementation of this code. <p>Training for Staff on Child Labour Prevention:</p> <ul style="list-style-type: none"> The Facility Provides training to the all staff involved in hiring and management on the importance of preventing child labor, understanding legal requirements, and recognizing fake documents. This section covers through ETI base code training. Last training conducted on 04.12.2024. <p>Monitoring and Auditing:</p> <ul style="list-style-type: none"> Facility has conducted internal audit regularly. Last internal audit was conducted on 07.07.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

1. There are no apparent concerns related to child labor at the factory.
2. The factory has a policy in place to participate in and contribute to programs that provide for the transition of a child found to performing child labor in order to enable the child to attend and remain in quality education until no longer a child.
3. No juvenile workers (14 to below the age of 18) are employed at the factory.
4. All practices regarding youth employment at the factory appear to be in line with ILO conventions.
5. Facility has a recruitment policy where it is mentioned that the facility reviews original photographic identification like National Id Card, Birth Certificate to validate that all workers are at least 14 years of old at the time of employment.
6. Facility has policy & procedure on "Child labor Remediation"
7. No worker under 18 years of age was found in the facility. Youngest worker in the facility was found 18+ years old. DOB: 01.09.2006 & DOJ : 11.11.2024

Evidence examined:

- Policy and Procedure
- Employee contract files of 52 sampled workers.
- Latest list of employees.
- Age proof documents like Computerized National Identity Card, Birth certificates and educational certificates.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	33%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	18
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

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

Management systems

Explanation for management systems grades

Wage & Benefit Policy:

○ The factory has a clear policy stating that all workers must be paid at least the legal minimum wage or higher. This policy is communicated to all workers and management to ensure everyone understands wage entitlements. Last policy reviewed on 04.01.2023.

Accurate Wage Calculation:

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

Timely Wage Payments:

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

Transparent Pay Slips:

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

No Unauthorized Deductions:

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

Fair Payment for Overtime and Benefits:

○ Workers are paid fairly for any overtime work and receive all legally required benefits, such as vacation pay, sick leave, and bonuses. Overtime pay rates comply with legal standards which is 200% of hourly basic wage. Facility provides 100% of basic salary as bonus twice in a year as festival bonus.

Effective Record-Keeping:

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

Training for workers:

• The factory covers the topic in their orientation training and train them about wages and benefits. Last compensation & benefits training was conducted on 11.12.2024.

Responsible Person:

• Facility selected Rajib Kumar Datta, Manager (Compliance, HR & Admin) to look after this Code.

Monitoring and Auditing:

• Facility has conducted internal audit regularly. Last internal audit was conducted regarding on compensation & benefits on 09.07.2024.

Continuous Improvement:

The factory continuously reviews and updates its wages and benefit policies and practices based on audit results, worker feedback, and changes in regulations to keep improving their benefit monitoring.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.H Comply with all other applicable laws tha...		GE ZAF600766543
Systems and evidence examined to validate this code section	<p>Current System:</p> <ul style="list-style-type: none"> •During current assessment it was noted that facility provides 13750 as minimum wage for which is comply legal minimum wage. Based on the Labor Gazette for Garments Notification, the actual lowest minimum wage in the facility is BDT 12500 per month. • During current assessment it was noted that factory provide group insurance benefits to workers. - As per local low no deduction for disciplinary. During disciplinary action procedure review it was noted that there are no disciplinary action in the facility. - Though wages records review It was noted that if workers attend training & meeting facility did not deduct for this time. - It was noted through wages records, pay slip records review that rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave written in a language (Bangla) worker understand. - It was noted through pay slip records review & workers & management interview that Each employee was given a understandable pay slip and signed for their wages. •Time keeping is face scan system. •All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. •All employees were paid within 7 working days of the following month. •Employees are aware of their minimum wage. •Wages have been recorded according to documents checked. •According to the documents which were provided by the HR & Accounts Departments and during the workers interview, it was noted that factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Moreover, employees were allowed to take 14 days' sick leave; 10 days' casual leave according to law and 11 days' festival leave. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Document review 2. Worker interview 3. Management interview 4. Local and national laws 5. Wages and benefits policy 6. Local legal minimum wage documents 7. Payroll records from December 2023 to audit day 8. Leave records 9. Social group insurance and payment receipts from the local labour department 10. Labour contracts for all employees 		

Findings: good examples

ZAF600766543

Good example

Code area

5 Legal wages are paid

Workplace requirement

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

Description

Facility Provides Attendance Bonis BDT 1000 to the all worker as per factory policy.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages are based on job skills and experience 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 remuneration

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

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	Non applicable

Actual overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	45.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	12500.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	12500.0
Minimum legal overtime wage	Min per hour	64.42
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	64.42
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	52
Provide the date and details of the records	52 Sample from month December 23 Random month 52 Sample from month November 24 Recent month 52 Sample from month July 24 Random month

Are there different legal minimum/ legally recognised CBAs wage grades?	<p>Yes</p> <p>"The Government has announced the new pay structure, which was implemented from 18th December, 2023 for the workers of the Garments Industries. For the workers (Schedule A): Grade No.1 (Monthly basic wage-Tk. 8390, House rent 50% of the basic-Tk. 4195, Medical allowance-Tk.750, Conveyance allowance-Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 15035)/ Grade 2 (Monthly basic wage-Tk. 7882, House rent 50% of the basic-Tk. 3941, Medical allowance- Tk.750, Conveyance allowance- Tk.450, Food subsidy- Tk.1250, Gross Monthly Wage- Tk. 14273)/ Grade 3 (Monthly basic wage- Tk. 7400, House rent 50% of the basic-Tk. 3700, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 13550)/ Grade 4 (Monthly basic wage-Tk. 6700, House rent 50% of the basic-Tk. 3350, Medical allowance-Tk.750, Conveyance allowance-Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 12500)/ Apprentice (Monthly basic wage-Tk. 4950, House rent 50% of the basic-Tk. 2475, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 9875) For the staff level (Schedule B) employees: Grade 1 (Monthly basic wage-Tk.10900, House rent 50% of the basic-Tk.5450, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy- Tk.1250, Gross Monthly Wage-Tk. 18800)/ Grade 2 (Monthly basic wage- Tk.9000, House rent 50% of the basic- Tk.4500, Medical allowance- Tk.750, Conveyance allowance-Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage-Tk. 15950)/ Grade 3 (Monthly basic wage-Tk.8500, House rent 50% of the basic- Tk.4250, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 15200)/ Grade 4 (Monthly basic wage-Tk.6900, House rent 50% of the basic- Tk.3450, Medical allowance- Tk.750, Conveyance allowance- Tk.450, Food subsidy-Tk.1250, Gross Monthly Wage- Tk. 12800)/ Apprentice (Monthly basic wage-Tk.5000, House rent 50% of the basic- Tk.2500, Medical allowance-Tk.750, Conveyance allowance- Tk.450, Food subsidy- Tk.1250, Gross Monthly Wage-Tk. 9950)"</p>
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	20% workers are paid legal minimum wage and 80% workers are paid above minimum wage
Are there any bonus schemes used?	<p>Yes</p> <p>1.The facility provides festival bonus 50% of gross to all workers as per company policy. 2.The facility provides monthly attendance bonus BDT 1000 to the worker as per factory policy.</p>
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.B Put in place a wage improvement plan th...		NC ZAF600766544
Systems and evidence examined to validate this code section		1. Facility conducted workers survey on living wage calculation on October 2024. 2. facility did not have improvement plan to meet the worker living wage. Evidence examined: 1. Worker interview. 2. Management interview. 3. Living wage calculation 4. Living Wage gap analysis.	

Findings: non-compliances

ZAF600766544

Non-compliance

Code area 5.A Living wages are paid	Status Open*
Workplace requirement 5.A.B Put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe.	Time given to resolve
Issue title 905 - CAR: A wage improvement plan (with Living Wage as the goal) has not been completed	Verification method Collaborative action required
Description It was noted through documents review and management interview that facility conducted living wage calculation on the worker. But facility did not have improvement plan to meet the worker living wage.	Area of non-compliance/non-conformance Base code
Corrective and preventative actions It is recommended that facility should conduct living wage gap analysis and make improvement plan to meet the worker living wage.	

* PDF generated at 10:33 (UTC) on 09 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Working Hour Policy: The factory has a policy that defines standard working hours, overtime limits, rest periods, and breaks in line with legal requirements. As per policy a worker shall work 8 hours as regular hours, after the regular hour they can work maximum 2 hours of OT if needed with their consent. Within this timeline they will get 1 hour meal break. Also they will get 1 day weekend on Friday.</p> <p>Timekeeping System: Face Punch timekeeping system is in place to accurately track and record working hours, including overtime, ensuring transparency. Workers can check their time records any time they want and can</p> <p>Fair Overtime Practices: Overtime is voluntary and compensated at a premium rate which is 200% of hourly basic wage following legal and company guidelines. If any workers do overtime on weekend they will get 1 day leave and 2 days basic salary as compensation.</p> <p>Training: - The factory covers the topic in their orientation training and train them about working hour. Last working hours training was conducted on 11.12.2024.</p> <p>Responsible Person: • Facility selected Rajib Kumar Datta, Manager (Compliance, HR & Admin) to look after this Code.</p> <p>Monitoring and Auditing: • Facility has conducted internal audit regularly. Last internal audit was conducted on 09.07. 2024.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employees' interviews, no inconsistency was noted either.

- Through employees' interview, overtime is voluntary.
- Timecards are completed Face scan system.
- All overtime is compensated at a premium rate for all employees.
- The time frame of the records reviewed are as follows:
52 samples from the month of November 2024 (Current month)
52 samples from the month of July 2024 (Random month)
52 samples from the month of December 2023 (Random Month)

According to time records and worker interview basic working hours were 8 hours per day and a max 48 hours per week. Maximum OT 02 hours per day and 12 hours per week were found in the sample months. The employee works for 06 days in a week. Weekend of the factory was Saturday.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable
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?	53.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Anti-Discrimination Policy:</p> <ul style="list-style-type: none"> The factory has a written policy that strictly prohibits all forms of discrimination based on race, gender, age, religion, disability, sexual orientation, or any other personal characteristic. This policy is shared with all workers and management. <p>Equal Opportunity Hiring:</p> <ul style="list-style-type: none"> The factory follows fair hiring practices that ensure all candidates have an equal chance of employment. Job postings, recruitment processes, and selection criteria are designed to avoid any bias or discrimination. Currently there are 39% of male workers and 61% of female workers in the facility. <p>Fair Treatment in the Workplace:</p> <ul style="list-style-type: none"> All workers are treated fairly in terms of job assignments, promotions, pay, and benefits. Decisions are based on qualifications, performance, and merit, not personal characteristics. <p>Responsible Person:</p> <ul style="list-style-type: none"> Rajib Kumar Datta, Manager (Compliance, HR & Admin) is the responsible person for this code area. <p>Accessible Reporting Mechanism:</p> <ul style="list-style-type: none"> The factory provides an easy and confidential way for workers to report any incidents of discrimination or harassment. Workers can raise their grievance via complain box, hotline or verbally to management and worker representatives. Reports are taken seriously and investigated promptly. <p>Training on Diversity and Inclusion:</p> <ul style="list-style-type: none"> All workers, supervisors, and managers received training on diversity, inclusion, and anti-discrimination through Mid Level Management training. Last training conducted on 23.10.2024. <p>Monitoring and Auditing:</p> <ul style="list-style-type: none"> Facility has conducted internal audit regularly. Last internal audit was conducted on 09.07. 2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> •There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. •Gender discrimination was also absent in the facility; both female and male workers were distributed in all types of work. •There was no evidence of sexual harassment. •There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases. •The factory provides the same wage amount to male/ female employees of the same rank. •There is no restriction for formation of trade union in the factory. <p>Evidence Examined:</p> <ol style="list-style-type: none"> 1. Grievance register 2. Grievance policy 3. Grievance training 4. Wages & benefits 5. Termination records review 6. Timecards 		

7. No discrimination is practiced

Data points

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

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Clear Employment Contracts:</p> <ul style="list-style-type: none"> • As per policy the factory provides all workers with clear, written contracts that outline the terms of regular employment. These contracts specify job roles, duties, wages, working hours, and the length of employment. <p>Stable Employment Practices:</p> <ul style="list-style-type: none"> • The factory ensures that workers are hired with the expectation of ongoing employment rather than temporary or casual contracts, except where temporary work is legally required or agreed upon. <p>Job Security and Continuity:</p> <ul style="list-style-type: none"> • Workers are provided with job security and continuity, including clear terms for termination or resignation. This means workers are not left uncertain about their employment status without proper notice or reason. <p>Regular Work Hours:</p> <ul style="list-style-type: none"> • The factory sets regular work hours and schedules, and workers are given a predictable work routine. Any changes to work hours or schedules are communicated in advance and managed fairly. <p>No Unjust Termination:</p> <ul style="list-style-type: none"> • The factory has clear policies against unjust termination. Workers can only be terminated for valid reasons, such as poor performance or misconduct, and with proper notice or severance pay according to the terms of their contract. <p>Training and Development:</p> <ul style="list-style-type: none"> • The factory provided training on Regular employment which covers the development opportunities to regular employees to support their career growth and skills enhancement. Last ETI base code training conducted on 04.12.2024. <p>Monitoring and Auditing:</p> <ul style="list-style-type: none"> • Facility has conducted internal audit regularly. Last internal audit conducted on 09.07.2024. Facility nominated Rajib Kumar Datta, Manager (Compliance, HR & Admin) is responsible for monitoring this Code & related issues.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<ul style="list-style-type: none"> • All employees were recruited by the factory directly. • No Labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors. • Facility did not used any sub-contractor workers in the factory. • All workers getting signed labor contract and ID card during their recruitment. • Factory maintains service books for all workers • Factory has policy to provide all kinds of compensation and benefits to the employees • If any employees want to leave the job, he or she may leave giving 60 days' notice prior to leave as per law. • No temporary worker, apprenticeship schemes or home worker was identified by the auditor. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Factory policy, rules and regulations, employees' personnel files, employees' ID card, pay slips etc. 2. Management interview and employee interview 3. The hiring and termination records. 4. Worker interview. 		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
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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%
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Percentage of workers employed as apprentices, trainees or interns	0.0%
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8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policies on Sub-Contracting and Homeworkers:</p> <ul style="list-style-type: none"> The factory has written policies outlining how sub-contractors and homeworkers are selected and managed. These policies ensure that all sub-contracting and homework arrangements comply with legal standards and ethical practices. However, facility used 3 subcontract. <p>Responsible person:</p> <ul style="list-style-type: none"> Facility nominated one person to monitor the this code named Rajib Kumar Datta, Manager (Compliance, HR & Admin) <p>Training and Support:</p> <ul style="list-style-type: none"> The factory provides training and support to sub-contractors on the working procedure & relevant standards, including safety practices, fair wages, and workers' rights verbally. <p>Monitoring and Auditing:</p> <ul style="list-style-type: none"> Facility has conducted internal audit regularly. Last internal audit was conducted on 09.07.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

- As per the facility documents review, management, worker interview and factory tour, there was no home working used by the facility currently.
- As per the facility documents review, management, worker interview and factory tour, there were 3 sub-contractor used in the facility for Printing & washing Process.
- Auditors have verified all the records and further verified through various internal and external challans.

Evidence examined:

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

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

Data points

Are homeworkers employed directly or engaged through an agent?

Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

Not Applicable. As the suppliers of the supplier does not use homeworkers. It was noted through management interview and suppliers audit records review.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

No unrecorded subcontracting used on site

Are any sub-contractors used?

Yes

Sub-contractor 1	Processes subcontracted	Printing
	Name of factory	Fair Design Printing Ltd
	Address	Shi 140-1, Chanpara, Bashon Sharok, Gazipur-1704, Dhaka, Bangladesh. 137, Ranavola,
	Dates used	2024
Sub-contractor 2	Processes subcontracted	Washing
	Name of factory	Orix Washing Project.
	Address	Nishatnagar, Turag. 1230, Dhaka, Bangladesh.
	Dates used	2024
Sub-contractor 3	Processes subcontracted	Washing
	Name of factory	AKH Washing Ltd.
	Address	Nandakhali, Rajfulbaria, Savar, 1340, Dhaka, Bangladesh.
	Dates used	2024

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ul style="list-style-type: none"> • Clear Anti-Harsh Treatment Policy: <ul style="list-style-type: none"> • The factory has a written policy that explicitly prohibits any form of harsh or inhumane treatment, including physical abuse, verbal abuse, harassment, or intimidation. • Responsible Person: <ul style="list-style-type: none"> • Rajib Kumar Datta, Manager (Compliance, HR & Admin), is the president of anti-harassment committee and she is nominated by the facility to look after the harassment related issues. • Training and Awareness: <ul style="list-style-type: none"> • All workers, supervisors, and managers receive regular training on what constitutes harsh or inhumane treatment and how to prevent it. This training includes information on respectful behavior, appropriate disciplinary methods, and how to report any incidents of mistreatment. Anti- Harassment training is conducted monthly and the last training was conducted on 19.12.2024. • Accessible Reporting Mechanism: <ul style="list-style-type: none"> • The factory provides a simple and confidential way for workers to report any incidents of harsh or inhumane treatment. Worker can report their grievance via grievance box, hotline and verbally to worker representatives and management directly. Reports are taken seriously and investigated thoroughly. • Promoting Respectful Behavior: <ul style="list-style-type: none"> • The factory promotes a culture of respect and dignity in the workplace. This includes encouraging positive behavior, open communication, and mutual respect among all workers. • Effective Investigation and Resolution: <ul style="list-style-type: none"> • When a report of mistreatment is received, the factory conducts a thorough investigation to determine the facts. • Regular Monitoring and Audits: <ul style="list-style-type: none"> • Rajib Kumar Datta, Manager (Compliance, HR & Admin) regularly monitors and audits workplace practices to ensure that harsh or inhumane treatment does not occur. All the representatives work under his supervision to mitigate these issues. facility has conducted internal audit regularly. Last internal audit was conducted on 09.07.2024

Summary of findings

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

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?

The facility had grievance mechanism system e.g; open door policy, grievance box, Participation committee, hotline etc.

Number of grievances raised in the last 12 months 7

Number of grievances resolved in the last 12 months 7

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ul style="list-style-type: none"> • Clear Environmental Policy: <ul style="list-style-type: none"> • The factory has a written policy to reduce environmental impact, including waste management, energy use, and emissions control. • Regulatory Compliance: <ul style="list-style-type: none"> • The factory follows all environmental laws and regulations, including permits and reporting requirements. • Responsible Person: <ul style="list-style-type: none"> • Rajib Kumar Datta, Manager (Compliance, HR & Admin) is responsible for monitoring the Environmental related issues. • Employee Training: <ul style="list-style-type: none"> • Workers are trained on environmental practices and their role in minimizing environmental impact. • Regular Monitoring: <ul style="list-style-type: none"> • The factory regularly monitors its environmental impact and performance, including emissions and waste. facility has conducted internal audit regularly. Last internal audit was conducted on 09.07.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§1	NC ZAF600766546
	10.A.B Comply with relevant local, regional a...	§2	NC ZAF600766547

Systems and evidence examined to validate this code section

- Through onsite inspection, interviews and document review, no violation of environment pollution was observed. The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties.
- Facility complies with relevant local and national laws regarding the use of water, energy and resources.
- Factory management has appointed a designated person Rajib Kumar Datta, Manager-HR, Admin & Compliance to take care about environmental requirement.
- Production process of the factory is Embroidery, Cutting, Sewing, Finishing and Packing. Factory management has conducted training on minimal uses of water, energy and natural resource to all employees.
- Factory management has the agreement with waste collect company for the disposal of general wastages like jute, poly, wastage cartons, papers etc. Factory management is aware about the environmental impact of their business activities.

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

Findings: non-compliances

ZAF600766546		Non-compliance	Due 2025-02-08
Code area 10.A Environment 2-Pillar		Status Open*	
Workplace requirement 10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.		Time given to resolve 30 days	
Issue title 598 - The site does not have all legally required permits for use and/or disposal of resources (e.g. energy, water, air emissions, waste etc.)		Verification method Desktop audit	
Description It was noted through documents review that the facility did not have any Environmental Clearance Certificate (ECC) for Captive power plant from concerned authority. Note that the facility have applied for the license on 26.01.2023.		Area of non-compliance/non-conformance Local law Base code	
Corrective and preventative actions It was recommended that the facility should obtain Environmental Clearance Certificate (ECC) from the concern authority.			
Local law reference The Bangladesh ECR 2023 Rule 6 (4): Green, Yellow, Orange and Red class new industrial establishments will not be able to start trial production or projects without obtaining environmental clearance.			

Evidence



[APPLICATION FORM ECC_144927.pdf](#)


* PDF generated at 10:33 (UTC) on 09 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600766547	Non-compliance	Due 2025-02-08
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Code area

10.A Environment 2-Pillar

Status

Open*

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Time given to resolve

30 days

Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

Verification method

Desktop audit

Description

It was noted through documentation review and management interview that the facility did not have Environment Clearance Certificate (ECC) for Captive Power Plat (CPP). However, the facility already applied for the license.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that the facility shall collect the renewed Environmental Clearance Certificate (ECC) for Captive Power Plat (CPP) from the concerned authority as soon as possible.

Local law reference

In accordance with The Bangladesh ECR 2023 Rule 21 (1): Each Environmental Clearance Certificate shall have to be renewed at least thirty days before expiry of its validity period.

Evidence



[CPP all updated application.pdf](#)



* PDF generated at 10:33 (UTC) on 09 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No the facility did not have any 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

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>- Through onsite inspection, interviews and document review, no violation of environment pollution was observed. The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties.</p> <p>- Facility complies with relevant local and national laws regarding the use of water, energy and resources.</p> <p>- Factory management has appointed a designated person Mr. Rajib Kumar Datta, Manager-HR, Admin & Compliance to take care about environmental requirement.</p> <p>- Production process of the factory is Embroidery, Cutting, Sewing, Finishing and Packing. Factory management has conducted training on minimal uses of water, energy and natural resource to all employees.</p> <p>- Factory management has the agreement with waste collect company for the disposal of general wastages like jute, poly, wastage cartons, papers etc. Factory management is aware about the environmental impact of their business activities.</p> <p>Evidence Examined:</p> <ol style="list-style-type: none"> 1. Environment management policy 2. Environments parameter test report 3. Environmental strategic plan 4. Wastage inventory 5. Waste management 		

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?	Not Applicable
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes The facility have set target to reduce water consumption to .5%, Energy consumption , GHG emission .
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 (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	165,194	183,775
Total electricity consumption from renewable sources (kWh)	124,162	122,427
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar
Total natural gas consumption (kWh)	343,027	323,582

Usage of other purchased fuels	1055034	1075792
Has the site completed any carbon footprint analysis?	No	No
Water sources	Under Ground Water	Under Ground Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	41,503	42,536
Water discharged	Ground Water	Ground Water
Water volume discharged (m3)	41,503	42,536
Water volume recycled (m3)	2,828	2,848
Total waste produced (mt)	69.3	69.2
Total hazardous waste produced (mt)	8.2	8.3
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	61.1	60.9
Total product produced (mt)	990	1,023

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Clear Anti-Harsh Treatment Policy:</p> <ul style="list-style-type: none"> The factory has a written policy that explicitly prohibits the business ethics and anti-bribery policy. <p>• Responsible Person:</p> <ul style="list-style-type: none"> Rajib Kumar Datta, Manager (Compliance, HR & Admin) is nominated by the facility to look after the business ethics related issues. <p>• Training and Awareness:</p> <ul style="list-style-type: none"> All workers, supervisors, and managers receive regular training on what constitutes business ethics and how to prevent it. Business ethics training was covered in the ETI base code training. Last training was conducted on 04.12.2024. <p>• Effective Investigation and Resolution:</p> <ul style="list-style-type: none"> When a report of business ethics is received, the factory conducts a thorough investigation to determine the facts. <p>• Regular Monitoring and Audits:</p> <ul style="list-style-type: none"> The factory Rajib Kumar Datta, Manager (Compliance, HR & Admin) regularly monitors and audits workplace practices to ensure that the business ethics is maintained properly. All the representatives work under his supervision to mitigate these issues. facility has conducted internal audit regularly. Last internal audit was conducted on 09.07.2024

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

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

Evidence examined:

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

10.C. Business ethics

Data points

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 facility did not have any certified anti-bribery Management Systems

Attachments



[Eve Dress- Shirts Ltd - Photoframe for Social.pdf](#)



[Policy-part 2.rar](#)



[Factory Licence.pdf](#)



[Training File_Eve Dress.pdf](#)



[EVE Dress- Shirts' Ltd Building Description.pdf](#)



[Eve dress shirt CAPR.pdf](#)





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