

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	ZC5000013166	Auditor company name	GSCS International Ltd
Date of audit	2024-10-09	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1000014318	Site name	DONG JIN INDUSTRIAL BD COMPANY LTD
Business name	DONG JIN INDUSTRIAL (BD) COMPANY LTD.	Site address	5300 Plot#18-19, Sector#1, Uttara EPZ, Nilphamari.; Nilphamari Sadar PS; Nilphamari-5300; Bangladesh, Nilphamari Sadar, BD
Site phone	01537072206	Site email	hrdongjin90@gmail.com

Audit parameters

Time in and out	Day 1	
	In	09:20
	Out	15:50
Audit type	Periodic	
Was the audit announced?	Unannounced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Md. Shamim Uddin / General Manager	
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	No union was present in the facility. As the facility located at EPZ so union is not applicable for them. However the facility has a workers participation committee and the participation committee representative was present in the opening meeting.		
Reason for absence during the audit	No union was present in the facility. As the facility located at EPZ so union is not applicable for them. However the facility has a workers participation committee and the participation committee representative was present in the audit.		
Reason for absence at the closing meeting	No union was present in the facility. As the facility located at EPZ so union is not applicable for them. However the facility has a workers participation committee and the participation committee representative was present in the closing meeting.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

None

Lead auditor

Akil Mahmud

APSCA Number

32200701

Additional auditor

Md. Tanvir Hasan Khan

APSCA Number

32200442

Md. Shamim Hossain

APSCA Number

32400342

Date of declaration

2024-10-09

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	Md. Shamim Uddin
Title	General Manager
Date of declaration	2024-10-09

Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC ZAF600667802
2. Freedom of association and right to collective bargaining are respected	2.E Comply with all other applicable laws tha...	§1	NC ZAF600667803
5. Legal wages are paid	5.H Comply with all other applicable laws tha...		GE ZAF600667804
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...		NC ZAF600667805
	3.L Implement effective processes to manage f...		NC ZAF600667806

Local law issues

§1 In accordance with Bangladesh EPZ Labor Rules 2022, 220(3):

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	ZC5000013166	
Sedex site reference	ZS1000014318	
Company name	DONG JIN INDUSTRIAL (BD) COMPANY LTD.	
Business ownership type	GOODS	
Site name	DONG JIN INDUSTRIAL BD COMPANY LTD	
Site name in local language		
GPS location	GPS address	Plot#18-19, Sector#1, Uttara EPZ, Nilphamari.; Nilphamari Sadar PS; Nilphamari-5300; Bangladesh
	Coordinates	25.8601648 and 88.8602543
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Md. Shamim Uddin
	Job title	General Manager
	Phone number	01537072206
	Email	hrdongjin90@gmail.com
Applicable business and other legally required business license numbers and documents	Factory License No.03.314.014.05.00.024.2011-1361 issued by BEPZA, on dated November 2nd, 2011. Trade License No. 012, is issued by Bangladesh Export Processing Zones Authority which is valid till June 30, 2025. Fire License No. Nil/731/2011-2012 issued by Bangladesh Fire Service & Civil Defense Authority, which is valid till June 30, 2025. Certificate of Incorporation No. C-96352/11, with life time validity started from October 20th, 2011.	

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	
	Other	
Product type	The factory specialized in manufacturing of all kinds of Wig & costume. The main production process is Main Fibre , Embossing, Cutting, Blending & Weighting, Tie-Rubber band, Labeling, Sewing, Finishing & Packing.	
Process overview	The factory specialized in manufacturing of all kinds of Wig & costume. The main production process for wig is Main Fibre , Embossing, Cutting, Blending & Weighting, Tie-Rubber band, Labeling, Sewing, Finishing & Packing. For Costume Cutting, Sewing, Finishing & Packing. Facility have 2 Lines for Costume & 8 Lines for Wigs Production. CAP Making Machine 1 Pcs, Blending Cutter 3 Pcs, Curling Machine 4 Pcs, Oven 2 Pcs, DOSO (Computer HP Machine) 12 Pcs, Heating Machine 1 Pcs, Styling washing Machine 1 Pcs, Mixing Tank Machine 1 Pcs, Extraction Molding Machine 2 Pcs, Wire Drawing Machine 1 Pcs, Hair Blending Machine 1 Pcs, Air compressor 1 Pc, Embossing Machine 31 Pcs, Single Needle Lock Stitch Machine 36 Pcs, Washing Machine 3 Pcs, Double Needle Lock Stitch Machine 2 Pcs, 3 Thread Overlock Machine 5 Pcs, 4 Thread Overlock Machine 7 Pcs, 5 Thread Overlock Machine 7 Pcs, Flat Lock Machine 2 Pcs, Kansai 1 Pcs, Button Hole 2 Pcs, Button Stich 2 Pcs, Snap Button 2 Pcs, Zigzag 1 Pcs, Iron/ Pressing Machine 16 Pcs, Metal Detector 1 Pcs etc.	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	4000m ²	
Building 1	Last construction works on site	2011
	If building is shared, provide details	N/A
	Number of floors	2
	Description of floor activities	Building - 01 : Ground Floor : Costume Department, Wig Department. Costume Wear House ,Wig Wear House ,Lab Room ,Hot Work Area ,Hitting Room ; 1st Floor : Wig , Finished Goods Area , Labeling Department , Office Room

Site scope

Building 2	Last construction works on site	2024
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building -02 :Ground Floor : Canteen Shop , Workers Dining , Child Care Centre , Nurse Room Compliance Office Room.
Building 3	Last construction works on site	2024
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building -03 :Ground Floor : Generator Room , Sub-Station
Building 4	Last construction works on site	2024
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building -04 : Ground Floor : Security Building
Building 5	Last construction works on site	2011
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Building -05 : Ground Floor : Toilet Building , Male Toilet , Female Toilet
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not provided Facility pay the transport fees with the worker salary.

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? No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No
The site does not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

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

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	110 (42.8%)	147 (57.2%)	- -	257 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	110 (42.8%)	147 (57.2%)	- -	257 (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	5 (1.9%)	10 (3.9%)	- -	15 (5.8%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	5 (1.9%)	10 (3.9%)	- -	15 (5.8%)

* % of total workforce

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

1. Dinajpur

Workers by age

	Men	Women	Other	Total
18 - 24 years old	6 (2.3%)	3 (1.2%)	- -	9 (3.5%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Workers by employee type

	Men	Women	Other	Total
Employees in management positions	11 (4.3%)	2 (0.8%)	- -	13 (5.1%)
Supervisors or team leaders	1 (0.4%)	0 (0%)	- -	1 (0.4%)
Administrative staff	9 (3.5%)	3 (1.2%)	- -	12 (4.7%)

* % of total workforce

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

Describe how this may vary during peak periods Not Applicable The facility have no 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	42%	58%	-	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	110 (42.8%)	147 (57.2%)	- -	257 (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	110 (42.8%)	147 (57.2%)	- -	257 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details Not Applicable

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 Total 26 Worker Interviewed (4 Groups of 5 Workers), 6 Individual

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) Nothing Compliant
What did the workers like the most about working at this site?	Transport Social activities and events Grievance mechanisms Hours worked, rest days or breaks
Additional comments	Nothing to Report
Attitude of workers' committee/union representatives	Total working hour is within standard and overtime is fully voluntary.
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	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	8	12	-	20

Workers interviewed by group/individual

Workers interviewed individually	2	4	-	6
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Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	2	3	-	5
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	2	3	-	5

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

* 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 records are maintain as per law.

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)	1.0%	1.0%	-	2.0%
Last full calendar year (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

* 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	<ul style="list-style-type: none"> - 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. - 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. - 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. - 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. 		

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
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Did any workers selected by the auditor decline to be interviewed?	No
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Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	No
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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 Policies About Voluntary Employment:
- The factory has clear policies that say all workers must choose to work freely. These policies are shared with everyone—workers, supervisors, and hiring agencies—so everyone understands that no one should be forced to work through threats or pressure. Forced Labor, Bonded Labor, Voluntary Work Policy, Free and Fair Employment Policy were found during documentation review.
- 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:
- Permanent workers can leave their job by providing 30 days notice, as stated in their contract. 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 covers the force labor related issues on the ETI base code training. Last training was conducted on 03.10.2024.
- Fair Hiring Practices:
- The factory makes sure that hiring is done fairly. Workers do not have to pay fees to get a job. Facility hire their employees by themselves.
- 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.
- Responsible Person:
- Facility selected Md. Shamim Uddin, General Manager (HR, Admin & Compliance) to look after this Code. He conducts or coordinates all the training on forced labor, bonded labor, voluntary work policy by himself.
- Regular Checks and Audits:
- Facility has conducted internal audit regularly. Last internal audit was conducted on 01.05.2024.

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. It was confirmed that this policy is actively followed which was verified by in/out register and workers and security guard interview.
- Surveillance practices are regulated to avoid excessive monitoring or intimidation. The use of CCTV and other surveillance methods is justified and aligns with privacy standards.
- Workers are free to communicate and interact both inside and outside the workplace. There are no restrictions on social interaction or intentional isolation.
- The facility's policy of not retaining workers' original passports or identity documents is a commendable practice that aligns with international labor standards and the facility does not retain workers' original passports or identity documents. During recruitment management takes a photocopy of NID and birth certificate as evidence. Facility provides personal locked to every individual workers. Workers usually use it for their lunch and sandals.
- Workers can resign without incurring any fees and receive all due wages and benefits. Policies ensure compliance with legal requirements, and records confirm proper handling of resignations. Workers can resign any time after a notice period of 30 days as per local requirement. Also workers paid all the entitled benefits as per requirement.
- Workers are paid according to a regular schedule that meets legal requirements. Payroll records show that payments are timely and in line with applicable laws which is within 7 days of the following months. Last months salary was paid on 29th Sep 2024.
- The facility ensures fair compensation and does not place workers in debt. Loan scheme is not established yet also there is no evidence of wage or others benefits retention. Verified by documentation review and workers interview.
- The facility does not require workers to post deposits or bonds. Relevant policies and payroll records confirm that no such financial burdens are imposed.
- Payments are not withheld or used for forced savings. Payroll records indicate that workers receive their earnings in full and on time verified by reviewing payroll records, worker and management interview.
- The facility ensures that workers receive at least the legal minimum wage and complies with laws regarding working hours and overtime. A new Gazette for EPZ workers in introduced in December 2023 and facility implemented the Gezette immediately. If necessary management assigned workers for max 2 hours of overtime with their consent. Also facility provides 1 day off which is Friday. Compliance is verified through payroll and legal reports.
- The facility had a policy which strictly prohibits any kind of force labor and all the other stakeholders are in line with this practice. Records of audits and assessments confirm adherence to these practices.
- Facility did not use any prison labor.
- The facility adheres to all relevant laws concerning the specified Code Area. Documentation and audit reports confirm full compliance with legal requirements.

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
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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
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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
Explanation for management systems grades	<ul style="list-style-type: none"> • Clear Hiring Policies: <ul style="list-style-type: none"> • The factory has a recruitment policy 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. • Written Contracts in a Language Workers Understand: <ul style="list-style-type: none"> • Every worker gets a clear, written contract in local language so that 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: <ul style="list-style-type: none"> • Workers do not have to pay any fees to get a job at the factory. This includes fees for tests, Employee ID card, PPE etc. • Fair Treatment During Hiring Process: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • Facility provides training on responsible recruitment to the relevant staffs. • Responsible Person: <ul style="list-style-type: none"> • Facility selected Md. Shamim Uddin, (General Manager) to look after this Code. • Regular Checks and Audits: <ul style="list-style-type: none"> • Internal audits are conducted once in every 6 months to ensure that the factory complies with all social regulations and standards. This helps identify areas for improvement. Last internal audit was conducted on 01.05.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
Systems and evidence examined to validate this code section	<p style="text-align: center;">No findings</p> <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. During recruitment management check birth certificate to validate information. - At the start of the employment facility provided a copy of appointment letter is provided to the worker which includes the job description, working hour , pay scale and others relevant information. - Facility established a policy regarding child labor which prohibits workers under the age of 14. As per local law facility can recruit workers above 14 years as young worker however, no such worker was found during audit and the youngest worker age was 30+. - All of them were recruited directly by the factory and no agency was involved in the factory's recruitment processes. - No agency staff or foreign worker was used by the factory. Facility provides all recruitment fees for the worker. - There were not any deductions for items such as travel and equipment. -Facility does not have any sub-contractor worker. - Facility policy reflects that they will not recruit any child labor or young worker. - Facility has an anti-corruption and bribery policy where it reflects that all recruitment will be done fairly. - Facility doesn't have any agency workers. <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

All recruitment fees and costs paid by factory.

Were recruitment fees or costs identified during worker interviews?

No

During workers interview it was noted that all recruitment fees and costs paid by factory.

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	Fundamental Improvements Required

Management systems

Explanation for management systems grades

- Policy on Freedom of Association:
 - The factory has a clear, written policy that supports workers’ rights to join or form any kind of worker committee 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.
- 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:
 - Workers can raise issues without fear of retaliation to the representative they chose. The representatives are responsible to carry the messages to management and the management investigates and resolves these concerns quickly.
- Training for workers awareness:
 - The factory covered this topic on their ETI base code training which was conducted on 03.10.2024. Total 17 participants participated on this training.
- Responsible Person:
 - Facility selected Md. Shamim Uddin, (General Manager) to look after this Code.
- Regular Checks and Audits:
 - 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 01.05.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
2. Freedom of association and right to collective bargaining are respected	2.E Comply with all other applicable laws tha...	§1	NC ZAF600667803

Systems and evidence examined to validate this code section

-All the employees can form or join the trade union of their choice. They are well aware about the legal requirement regarding trade union and collective bargaining agreement.
-There is no trade union in the facility but there is a Participation Committee.
-Participation Committee was formed by election on 5th December 2023. However, facility formed PC committee based on Bangladesh Labor Act 2006 instead of EPZ Labor Rules 2022.
-Last Participation Committee meeting is held once in two months. Last meeting was held on 03 September 2024.
-Meeting minutes are posted in notice board and recorded in a register.
-There are 3 members from worker side and 3 from management side with 6 members. However, Facility needed 8 member as required by EPZ Labor Rules 2022.
- All the workers are well aware of the participation committee members.
-PC members are not treated less favorably than other workers.
-PC members can carry out their duties within working hours without affecting their pay.
- The facility adheres to all relevant laws concerning the specified Code Area.
Documentation and audit reports confirm full compliance with legal requirements.

Evidence Examined:

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

Findings: non-compliances

ZAF600667803

Non-compliance

Due 2024-12-18

Code area

2 Freedom of association and right to collective bargaining are respected

Status

Open*

Workplace requirement

2.E Comply with all other applicable laws that impose conditions on Code Area 2.

Time given to resolve

60 days

Issue title

835 - Legal requirements relating to worker committees are not met

Verification method

Desktop audit

Description

It was noted through document review that the facility has formed a workers participation committee but total member of the committee doesn't comply with the legal requirement as total member are 6 whereas considering the worker number the committee shall consist of 8 members.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that the facility shall form the participation committee consists of 8 members as per legal requirement.

Corrective and preventative actions (carried over)

It is recommended that the facility shall form the participation committee consists of 8 members as per legal requirement.

Local law reference

In accordance with Bangladesh EPZ Labor Rules 2022, 220(3):

* PDF generated at 06:34 on 19 Oct 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

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

Data points

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

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<ul style="list-style-type: none"> • Health and Safety Policy: • 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. • Regular Safety Inspections and Risk Assessments: • 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. • Proper Safety Equipment and Training: • 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 28.09.2024. • Responsible person: Facility has appointed Md. Anisur Rahman Chowdhury, (Fire Safety Manager). • Regular Health and Safety Audits: • 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 01.05.2024. • Continuous Improvement: 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 training monitoring because there was some NC which is mentioned in the workplace requirement.

Summary of findings

Code area	Workplace requirement	Local law	Finding
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3. Working conditions are safe and hygienic

3.N Maintain a log of all hazardous substance...

NC [ZAF600667805](#)

3.L Implement effective processes to manage f...

NC [ZAF600667806](#)

Systems and evidence examined to validate this code section

1. General Health and Safety Management
 - Potable water was freely available in all areas.
 - Sufficient clean toilets 18 (09 for male and 09 for female) segregated by gender were available at all times for workers.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Facility nurse 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 doesn't uses chemical for their production process
 6. Medical services
 - There were 4 first aid boxes with sufficient kits in the full facility.
 - Facility has appointed 01 nurse who are available in working time of the facility. They also arranged monthly first aid training with first aiders.
 - Facility has a medical room.
 7. Dormitory
 - Facility didn't provide dormitory facilities to any employees.
 8. Fire drill:
 - Internal day fire drill was held on 1.09.2024 and was conducted by Md. Touhid Islam, Compliance Officer.
 9. Training:
 - a) Health & Safety Training Date: 19/09/2024
 - b) PPE Training Date:28/09/2024
 - c) Fire Training Date:29/09/2024
 - d) First Aid Training Date: 05/09/2024
 - e)Labor Law Training Date : 10/09/2024
 - f)Mid Level management Training Date : 06/10/2024
 - g)Grievance Training Date : 21/09/2024
 10. Risk assessment

Facility conducted risk assessment at least once a year.Risk assessment was last conducted on 11.9.2023.
 11. Safety committee:
 - Facility has formed a safety committee as per legal requirement.
 - Total member of safety committee are 6 (3 from worker side and 3 from management side).
 - Last meeting was conducted on 18.09.2024 which is not 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

ZAF600667805

Non-compliance

Due 2024-11-18

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

237 - Improper storage of hazardous substances (e.g. chemicals and pesticides)

Verification method

Desktop audit

Description

It was noted through facility tour that facility had kept diesel drum without any secondary containment and proper labelling beside generator room.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

It is recommended that the facility shall keep diesel drums with secondary containment and with proper labelling

Corrective and preventative actions (carried over)

It is recommended that the facility shall keep diesel drums with secondary containment and with proper labelling

Evidence



[Diesel drum kept without secondary containment and label.JPG](#)



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ZAF600667806

Non-compliance

Due 2024-11-18

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

215 - Evacuation plan not adequately communicated to workers

Verification method

Desktop audit

Description

It was noted through facility tour, worker and management interview that facility didn't post evacuation map on the eastern side exits of building 1. Noted that the facility has posted evacuation map on the western side exit.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

It is recommended that the facility shall post evacuation map on the mentioned area.

Corrective and preventative actions (carried over)

It is recommended that the facility shall post evacuation map on the mentioned area.

* PDF generated at 06:34 on 19 Oct 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

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)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Site owned transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable Not Applicable , Facility have no structural additions (e.g. added floors) have a valid permit/inspection report as per local law
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?	No

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	<ul style="list-style-type: none"> • Policy Against Child Labour: <ul style="list-style-type: none"> • The factory has a written policy & remediation policy that child labor shall not use. This policy follows all local and international laws and standards on minimum working age. It is communicated to all workers, supervisors, and hiring agencies. However, facility should update child labor & remediation policy. • Strict Age Verification Process: <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. • Remediation Plan if Child Labour is Found: <ul style="list-style-type: none"> • In child labor policy facility mentioned the complete remediation plan if any child labor is recruited mistakenly. • Training for Staff on Child Labour Prevention: <ul style="list-style-type: none"> • Regular training is provided for all staff involved in hiring and management on the importance of preventing child labor, understanding legal requirements, and recognizing fake documents. Last training on Child labor was conducted on 02.10.2024. • Monitoring and Auditing: <ul style="list-style-type: none"> • Md. Shamim Uddin, (General Manager) is responsible for monitoring the child labor related issues.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			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 (under 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 30 years of age was found in the facility. Youngest worker in the facility was found 29+ years old. Date of birth 11.07.1994 and date of join 17.09.2022.

Evidence examined:

- Policy and Procedure
- Personnel files of 26 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	3%
Enter the legal age of employment	14
Enter the age of the youngest worker identified	30
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

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

Management systems

Explanation for management systems grades

Wage & Benefit Policy:

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

Accurate Wage Calculation:

○ The factory has a reliable system for calculating wages that ensures all workers are paid correctly based on their hours worked, overtime, and any applicable benefits. This includes accurate record-keeping for hours worked and pay calculations. Currently facility is following the recent EPZ minimum wage gazette for Terry towel/Sweater/Wig section which was published in February 2024 but it was implemented from December 2023 as per BEPZA instruction.

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 EPZ law.

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.

Awareness and training:

- Workers are trained on wages and benefits at the beginning stages of the employment and also if any changes is introduced by law or internal policies.
- Also as per company training schedule facility arranges training on ETI base code which covers the compensation and benefits topics. Last training was conducted on 03.10.2024.

Monitoring and Auditing:

○ 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 01.05.2024. Responsible person for implementing the policies is Mahmud Alam, (Asst. Manager- Accounts).

Summary of findings

Code area	Workplace requirement	Local law	Finding
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5. Legal wages are paid

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

GE [ZAF600667804](#)

Systems and evidence examined to validate this code section

Current System:

- During current assessment it was noted that facility provides 13250 as minimum wage for which is comply legal minimum wage. Based on the EPZ Gazette Notification, the actual lowest minimum wage in the facility is BDT 13,250 per month.
- During current assessment it was noted that factory provide group insurance benefits to workers.
 - As per local law no deduction for disciplinary. During disciplinary action procedure review it was noted that there are no disciplinary record in the facility.
 - Though wages records review It was noted that if workers attend training & meeting facility did not deduct for this time.
 - It was noted through wages records, pay slip records review that rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave written in a language (Bangla) worker understand.
 - It was noted through pay slip records review & workers & management interview that Each employee was given a understandable pay slip and signed for their wages.
- Time keeping is face punch system.
- All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- All employees were paid within 7 working days of the following month.
- Employees are aware of their minimum wage.
- Wages have been recorded according to documents checked.
- According to the documents which were provided by the HR & Accounts Departments and during the workers interview, it was noted that factory provides all kinds of leave. Maternity leave and earn leave benefits are provided to the employees as per law. Moreover, employees were allowed to take 14 days' sick leave; 10 days' casual leave according to law and 11 days' festival leave.

Evidence examined:

1. Document review
2. Worker interview
3. Management interview
4. Local and national laws
5. Wages and benefits policy
6. Local legal minimum wage documents
7. Payroll records from September 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

ZAF600667804

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 bonus BDT 200 to all workers as per company policy.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) Facility Paid on Hand Cash.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	Between 1 and 10%

Worker remuneration

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

Is legal wage/legally recognised CBAs data available for any of these options?	Not available	
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	52.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	13250.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	13250.0
Minimum legal overtime wage	Min per hour	70.0
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	70.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	26
Provide the date and details of the records	26 Sample from August 24 recent month 26 Sample from May 24 random month 26 Sample from October 23 random month

<p>Are there different legal minimum/ legally recognised CBAs wage grades?</p>	<p>Yes</p> <p>There are five wages grades as per minimum wages circular 2024 (EPZ). Schedule (ga) 1. High Skilled BDT 17000, 2. Skill Grade 2 : BDT 14825 3. Semi Skilled : BDT 14175; 4. Unskilled : BDT 13250, 5. Apprentice BDT 10175.</p>
<p>For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?</p>	<p>Above legal minimum</p>
<p>Indicate the breakdown of workforce per earnings</p>	<p>The facility provides legal minimum wage (13250) to 10% workers and provides above legal minimum wage to 90% workers.</p>
<p>Are there any bonus schemes used?</p>	<p>Yes</p> <p>1.The facility provides festival bonus 50% of gross to all workers as per company policy. 2. The Facility Provides attendance Bonus BDT 200 all workers as per factory Policy.</p>
<p>Were accurate records shown at the first request?</p>	<p>Yes</p>
<p>Were any inconsistencies found?</p>	<p>No</p>

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
5.A. Living wages are paid	5.A.A Review workers' total pay including ben...		NC ZAF600667802
Systems and evidence examined to validate this code section	<p>1. Facility did not conduct any worker's survey on living wage calculation & gap analysis.</p> <p>2. Facility had not any improvement plan for remediation.</p> <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Living wage survey report. 2. Gap analysis report. 3. Worker interview. 4. Management interview. 		

Findings: non-compliances

ZAF600667802

Non-compliance

Code area

5.A Living wages are paid

Status

Open*

Workplace requirement

5.A.A Review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.

Time given to resolve

Verification method

Collaborative action required

Issue title

903 - CAR: A living wage gap analysis has not been completed

Area of non-compliance/non-conformance

Base code

Description

It was noted through document review, worker and management interview that the facility has not conduct the living wage calculation and gap analysis with actual paid wage and they didn't have any wage improvement plan yet.

Corrective and preventative actions

It is recommended that the facility shall calculate living wage, gap analysis & implement a wage improvement plan.

Corrective and preventative actions (carried over)

It is recommended that the facility shall implement a wage improvement plan based on the gap between the living wage and actual wage paid.

* PDF generated at 06:34 on 19 Oct 2024. [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: A manual 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: Workers are trained on working hour at the beginning stages of the employment and also if any changes is introduced by law or internal policies.</p> <p>Monitoring and Auditing: Facility had an internal audit on "working hour" on 01.05.24. They have established a system within 6 months which includes all the sections of ETI base code.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			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.
- Time cards are completed electronically.
- All overtime is compensated at a premium rate for all employees.
- The time frame of the records reviewed are as follows:

26 samples from the month of August 2024 (Current month)
26 samples from the month of May 2024 (Random month)
26 samples from the month of October 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 Friday. The facility working hours for all section in the factory is operating in one shift e.g. shift starts from 06:45 to 15:45 with 60 minutes break from 12:30 to 13:30. Only security has three shifts per eight hours each with roster schedule of break & weekend.

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 facility provides double of basic as overtime rate.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	60.0
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
<p>Explanation for management systems grades</p> <p>Anti-Discrimination Policy: • The factory has a written policy that strictly prohibits all forms of discrimination based on race, gender, age, religion, disability, sexual orientation, or any other personal characteristic. This policy is shared with all workers and management.</p> <p>Equal Opportunity Hiring: • The factory follows fair hiring practices that ensure all candidates have an equal chance of employment. Job postings, recruitment processes, and selection criteria are designed to avoid any bias or discrimination. Currently there are 42% of male workers and 58% of female workers in the facility.</p> <p>Fair Treatment in the Workplace: • All workers are treated fairly in terms of job assignments, promotions, pay, and benefits. Decisions are based on qualifications, performance, and merit, not personal characteristics.</p> <p>Accessible Reporting Mechanism: • The factory provides an easy and confidential way for workers to report any incidents of discrimination or harassment. Workers can raise their grievance via complain box, hotline or verbally to management and worker representatives. Reports are taken seriously and investigated promptly.</p> <p>Training on Diversity and Inclusion: • All workers, supervisors, and managers receive regular training on diversity, inclusion, and anti-discrimination. This training helps everyone understand and respect differences and recognize and prevent discriminatory behavior. Facility covers all the topics on anti-discrimination on their orientation training and refresher training. Last refresher training was conducted on 11.02.2024. Facility also provided grievance training which includes the reporting process if anyone felt discriminated. Last training on grievance was conducted on 22.09.2024. Md. Shamim Uddin, (General Manager) is the responsible person to implement this code.</p> <p>Monitoring and Auditing: • 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 01.05.2024.</p>	

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. 		

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)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Bangladeshi

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
<p>Explanation for management systems grades</p> <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 provides training on Regular employment which covers the development opportunities to regular employees to support their career growth and skills enhancement. <p>Monitoring and Auditing:</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 01.05.2024. Md. Shamim Uddin, (General Manager) is responsible for monitoring the Regular Employments 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 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 30 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	<ul style="list-style-type: none"> • Policies on Sub-Contracting and Homeworkers: <ul style="list-style-type: none"> • The factory has written policies outlining how sub-contractors and homeworkers will be selected and managed. These policies ensure that all sub-contracting and homework arrangements comply with legal standards and ethical practices. The facility did not use any homeworkers and sub-contract. • Due Diligence and Selection: <ul style="list-style-type: none"> • If they use any sub-contact, the factory conducts thorough due diligence to ensure they meet legal and ethical standards. This includes checking their compliance with labor laws, safety regulations, and fair treatment practices. <p>Responsible person:</p> <ul style="list-style-type: none"> • Facility declared & nominated Md. Shamim Uddin, (General Manager) to monitor the sub-contract facilities to ensure compliance with legal standards and ethical practices. <ul style="list-style-type: none"> • Training and Support: <ul style="list-style-type: none"> • The factory declared they will provide training and support to sub-contractors on the working procedure if they use any sub-contractor. • Monitoring and Auditing: <ul style="list-style-type: none"> • Facility doesn't use any sub-contractor now but as per their policy they will conduct internal audit of the sub-contractor whenever they will use any sub-contractor.

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 no sub-contractor used in the facility currently.
- Auditors have verified all the records and further verified through various internal and external challans.

Evidence examined:

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

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

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
Not Applicable.

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? No

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"> • Md. Shamim Uddin, (General Manager) is the president of anti-harassment committee and he 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 was conducted on 03.10.2024. • 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"> • Md. Shamim Uddin, (General Manager) himself 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.

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 etc.

Number of grievances raised in the last 12 months 1

Number of grievances resolved in the last 12 months 1

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"> • Md. Shamim Uddin, (General Manager) is responsible for monitor 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. Last training was conducted on 15.09.2024. • Regular Monitoring: <ul style="list-style-type: none"> • The factory regularly monitors its environmental impact and performance, including emissions and waste. They conduct internal audit on environmental aspect as per ISO 14001 standard. Last interna audit was conducted on 01.05.2024.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

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

Evidence examined:

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

10.A. Environment 2-Pillar

Data points

<p>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)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>The facility does not have any valid environmental or energy management certificates.</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>No</p>

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>The factory had established an environmental policy, covering their environmental impact, which is communicated to all appropriate parties and its own suppliers.</p> <ul style="list-style-type: none"> • Main production process of the factory is Main Fibre , Embossing, Cutting, Blending & Weighting, Tie-Rubber band, Labeling, Sewing, Finishing & 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 wastage fabrics, poly, cartons etc. Factory management is aware about the environmental impact of their business activities. 		

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?	Biodiversity and eco system impact management Prioritising local suppliers Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes There are systems designed to manage client requirements and legislation related to environmental and chemical issues in destination countries.
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 During strategic plan & consumption reduce plan review it was observed that the facility set reduction targets for various environmental aspects such as water consumption, waste management, energy use, and greenhouse gas emissions (including Scope 1, 2, and 3 emissions). These targets are often part of their sustainability or environmental management plans.
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes Facility has waste collector agreement with a 3rd party waste collector and they have valid permit. Permit was available for review during audit.

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	490,399	414,018
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available

Total natural gas consumption (kWh)	Data not available	Data not available
Usage of other purchased fuels	Diesel for Generator 840 Litter	Diesel for Generator 1050 Litter
Has the site completed any carbon footprint analysis?	No	No
Water sources	BEPZA Water Supply	BEPZA Water Supply
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	10,152	8,173
Water discharged	BEPZA Drainage	BEPZA Drainage
Water volume discharged (m3)	7,100	5,560
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	18	17
Total hazardous waste produced (mt)	Data not available	Data not available
Waste to recycling (mt)	Data not available	Data not available
Waste to landfill (mt)	Data not available	Data not available
Waste to other (mt)	1	1
Total product produced (mt)	845	795

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<ul style="list-style-type: none"> • Clear Anti-Harsh Treatment Policy: • The factory has a written policy that explicitly prohibits the business ethics and anti-bribery policy. • Responsible Person: • Md. Shamim Uddin, (General Manager) is nominated by the facility to look after the business ethics related issues. • Training and Awareness: • 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 03.10.2024. • Effective Investigation and Resolution: • When a report of business ethics is received, the factory conducts a thorough investigation to determine the facts. • Regular Monitoring and Audits: • The factory General Manager himself 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.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- The company established a business ethics policy to communicate both externally and internally and provide training on business ethics.
- Md. Shamim Uddin, Factory General Manager 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

Not Applicable.

Attachments



[Signed CAPR- Dong Jin.pdf](#)



[GSCSF75-Photoframe for Social-Dong Jin.pdf](#)



[PC Committee.pdf](#)



[Company All Policy.pdf](#)



[Training.pdf](#)



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