



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC421700011	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS422170732	
Business name (Company name):	The Shoes Bangladesh Ltd			
Site name:	The Shoes Bangladesh Ltd			
Site address:	Srikhondia, Tongabari, Ashulia, Savar Dhaka 1341 BD	Country:	BD	
Site contact and job title:	Md Golam Sohan / Manager (HR, Admin and Compliance)			
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2022-12-22			

Audit Company Name:
GSCS International Ltd

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

## Audit Content:

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

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

### 2-Pillar SMETA Audit

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

### 4-Pillar SMETA

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

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

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

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Md. Fazlul Haque	APSCA Number:	21704069
Additional Auditors:	Washim Mia Md. Hemel Hossan		
Date of declaration:	2022-12-24		

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

Site Representation	
Full Name:	Md Golam Sohan
Title:	Manager (HR, Admin and Compliance)
Date of declaration:	2022-12-24
Comments:	N/A

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>	0.B.4 0.B.4 0.B.4 0.B.4	§1 §2 §3 §4	4	1	0	NC - ZAF600005934 NC - ZAF600005935 NC - ZAF600005936 NC - ZAF600005937 Obs - ZAF600005945
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.5	§10 §5 §6 §7 §8 §9	6	0	0	NC - ZAF600005939 NC - ZAF600005940 NC - ZAF600005941 NC - ZAF600005942 NC - ZAF600005943 NC - ZAF600005944
<u>4 - Child labour shall not be used</u>	4.2	§11	1	0	0	NC - ZAF600005938
<u>5 - Living wages are paid</u>			0	0	1	GE - ZAF600005946
<u>6 - Working hours are not excessive</u>			0	0	0	
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
§1	The Bangladesh Labor Rules, 2015, rules 355, Schedule 7
§2	The building Construction Act 1952, Section-3A
§3	Bangladesh Energy Regulatory Commission License Regulations, 2006, Section 9 (b)
§4	Bangladesh Labour Rules-2015, Rule 353(1)
§5	Bangladesh Labor Act 2006 (Amendment) 2013, Chapter- 8, Section –89 (8)
§6	Bangladesh Labour Act, 2006, Amended on 2013, Chapter-6, Section-62 (8)
§7	Bangladesh labour Laws, 2006, section 54
§8	Bangladesh Labor Act 2006, Chapter- 8, Section – 92

§9	Bangladesh Labour Rules 2015, Chapter-8, Section-92
§10	Bangladesh Labor Rules, 2015, Schedule-4, Matters relating to safety committee (2)
§11	Bangladesh Labour Act, 2006, Chapter-8, Section-94(1), (7), (3), (2)

## Site Details

Site Details			
Company Name	The Shoes Bangladesh Ltd		
Site Name	The Shoes Bangladesh Ltd		
GPS location (if available)	GPS Address:	Srikhondia, Tongabari, Ashulia, Savar, Dhaka 1341	
	Coordinates:	Latitude: 23.79316 (E) and Longitude: 90.40031 (N)	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Factory License No.: 21116/Dhaka Issued by Bangladesh Government, Valid up to 30 June 2023. Trade License No.: 002314 Issued by Ashulia Union Parishad Valid up to 30 June 2023. Fire License No.: AD/Dhaka/38106/18 and AD/Dhaka/49693/2021 Issued by Bangladesh Government, Valid up to 30 June 2023.		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Product: All kind of Footwear Items. Facility’s production capacity: 160,000 Pair/Per Month. Main production processes: Lamination, Cutting, printing, Emboss, sewing, Assembly and Finishing.		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The Shoes Bangladesh Ltd. was located at Srikhondia, Tongabari, Ashulia, Savar, Dhaka 1341. This is approximately 11.7 km far from Hazrat Shahjalal International Airport, Dhaka. The site was established in 2017. The total factory land area was 22,000 square feet and the production area was 55,270 square feet. The main production process is Lamination, Cutting, printing, Emboss, sewing, Assembly and Finishing. Total production capacities are 160,000 pair/per month.		
Structure and number of buildings	Building Name:		Building No. 01
	Floor	Description	Remark
	Ground Floor:	Cutting, Printing, Emboss and Bonded Warehouse	Nil
	1st Floor:	Preparation, Auto Sewing, Needle Room, Mini Store, Maintenance and Administration.	Nil
	2nd Floor:	Assembly to Finishing and Upper Store	Nil
	3rd Floor:	Office, PD, Finished Goods and Conference Room.	Nil
	Building Name:		Shed-1:
	Floor	Description	Remark
	Ground Floor:	Lamination, Chemical Store and Dining.	Nil



Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No visible structural integrity issues (large cracks) were observed during this audit.
Does the site have a structural engineer evaluation?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The Facility does not have a structural engineer evaluation.
Site function	<div> <input type="checkbox"/> Agent           <input checked="" type="checkbox"/> Factory Processing/Manufacturer         </div> <div> <input type="checkbox"/> Finished Product Supplier           <input type="checkbox"/> Grower         </div> <div> <input type="checkbox"/> Homeworker           <input type="checkbox"/> Labour Provider         </div> <div> <input type="checkbox"/> Pack house           <input type="checkbox"/> Primary Producer         </div> <div> <input type="checkbox"/> Service Provider           <input type="checkbox"/> Sub-contractor         </div>
Months of peak season	January to December



Process overview	Product: All kind of Footwear Items. Facility's production capacity: 160,000 Pair/Per Month. Main production processes: Lamination, Cutting, printing, Emboss, sewing, Assembly and Finishing. Main equipment Used: Hydraulic Cutting Machine, Sewing Arm Cutting Machine, Skiving Machine, Materials Measuring Machine, Station Cooling & Hitting Machine, Water Baise Lamination Machine, Plastic Board Surface Planing Machine, Lasere Cutting Machine, Emboss Machine, Stamping Machine, Tongue Lable Transper Machine, Foot Bed Transper Machine, Printing Table Machine, Automatic Screen Moving Dyer Machine, Hot Melt Roller Pasting Machine, Fussing Machine, Auto H-Folding Machine, Post Bed Single Needle Machine, Post Bed Double Needle Machine, Flat Bed Zig Zag Machine, Flat Bed Single Needle, Eylet Punch machine, Hot Melt Spray Machine, Automatic Round Eyelet Machine, Cylinder Bed Bainter Machine, Stroble Machine, Auto Spaieders Hemmer Machine, Latex Machine, Hot Air Blower Machine, Double Needle Flat Bed Machine, Hig Speed Electric Punch Machine, Cylinder Bed Zig Zag Machine, Upper Hammering Machine, D-Ring Eylet Machine, Micro Computer Cold Cutting machine, trimming Machine, Semi Automatic Thread Winding machine, Webaing Tap Cutter Machine, Toe Gathering Machine, Hot & Cold Back Part Molding Machine, Upper Streaming machine, Lasting Conveyor Machine, Upper Vamp Hitting, Toe Lasting Machine, Hell Lasting Machine, Sole Narking Machine, Air Dai Grinder Houd, Heumid Vamp Conveyor, Cemeting Conveyor, Walled Sole Press Machine, Walled Sole Press Machine, Repair Conveyor, Colling Chamber, D-Lastig Out Machine, Packing Conveyor, Double Units Polishing Machine, Vamp Roughing Machine, Automatic Anty Fungash Machine, Metal Detractor Conveyer Machine, Double Station Vacuum Sole Press Machine, Toe Cap Soft Streaming Machine, Hot Air Wrinkel Steam chasing Machine, Bonding Test Machine, Gig Speed Advertising Engraving Machine, Winda pattern Cutting Machine, Bally Leather Flexing Tester Machine, Color Fastness Rubbing Tester Machine, Moistur Meter Machine, Testing For color Lighting Box, Din Abrasion Resistance Testing machine, Electronic Balance Machine, Velcro Fatigue Testing Machine, Grey Scale Machine, Thickness Gauge Machine, Shoe A Durometer Machine, Shoe C Durometer Machine, Lax Meter Machine, Pattern sewing Machine, Automatic Bartek machine, Screw Typ Air Compressor Machine, Generator Machine, Joky Pump, Diesel Pump Machine, Fir Electric Pump Machine, Zebra Printing Machine, Dehumidifier Machine, IPS Machine & Transformer Machine.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Commitee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Participation committee
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Were all site provided accommodation buildings included in this audit</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The workers stay in the surrounding areas of the factory, no accommodation buildings were provided for the workers and this is not mandatory requirement by law.</p>
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Audit Parameters			
Time in and time out	Day 1		
	In	09:05	
	Out	17:25	
Audit type:	Full initial		
Was the audit announced?	SEMI_ANNOUNCED		
Was the Sedex SAQ available for review?	No		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Md Golam Sohan / Manager (HR, Admin and Compliance)		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	No	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	There is no trade union at this facility, and it is not mandatory by law.		
<i>Reason for absence during the audit</i>	There is no trade union at this facility, and it is not mandatory by law.		
<i>Reason for absence at the closing meeting</i>	There is no trade union at this facility, and it is not mandatory by law.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	205	0	0	0	0	0	0	205
Worker numbers – female	297	0	0	0	0	0	0	297
Total	502	0	0	0	0	0	0	502
Number of Workers interviewed – male	17	0	0	0	0	0	0	17
Number of Workers interviewed – female	25	0	0	0	0	0	0	25
Total – interviewed sample size	42	0	0	0	0	0	0	42

Nationalities Structure		
Nationality of Management	Bangladeshi	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1:    Bangladeshi    approx %:    100%	
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	0%
	Salaried:	100%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	None

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	6
Number of individual interviews:	Male: 07 Female: 05
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No complaint raised any sample workers against facility because they are happy with their working environment.
What did the workers like the most about working at this site?	Good working environment.
Any additional comment(s) regarding interviews:	Nothing to report
Attitude of workers to hours worked:	Workers were found satisfied working at the factory. No complaints against management were observed during worker interview. It was also confirmed that overtime is voluntary, no discrimination or inhumane treatment done or supported by the management.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:



Attitude of workers:
Not Applicable
Attitude of worker's committee/union reps:
During Interview, the worker committee representatives expressed that the facility management was nice to them, they could freely express their opinions, will, advice and suggestion without any fear or concern and they could make grievance if necessary. No negative information was observed during the audit.
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.

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

**0A: Compliance Requirements**

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it is communicated to all appropriate parties, including its own suppliers.
- The responsible person for implementation and monitoring is Md Golam Sohan / Manager (HR, Admin and Compliance).
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the report.
- The facility has policy and procedures for human rights.
- It is communicated to all appropriate parties, including suppliers through the responsible person.

**Evidence examined:**

1. Documentation files were reviewed. It stipulates complying with Human Rights, written policies and procedure that being provided individually to employees.
2. Letter of Authorization on implementing Human Rights
3. Impact for Human Rights assessment report
4. Management interview and employee interview

**Any other comments:**

None

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

The facility had posted the policy about respecting Human Rights in the policy board stated that Child labour shall not be used, Forced Labour shall not be used, no discrimination is practised, no harsh or inhumane treatment is allowed, disciplinary action taken, working hours etc.

Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Md Golam Sohan Job title: Manager (HR, Admin and Compliance).
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had established a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter by means of suggestion box, making the contact way of management in policy board and public areas in the facility.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility established an effective data privacy procedure for workers' information to protect the workers' privacy information.
<b>Measuring Workplace Impact</b>	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 6% This year 5%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	5%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 7% This year 6%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	6%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory maintains regular accident register. Medical Officer & Nurse are responsible positions to keep records of any accident.

Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	2%
	This year	1%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	1%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0%
	This year	0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0%
	12 month	0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0%
	12 month	0%

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

**0B: Compliance Requirements**

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.  
0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.  
0.B.3 Suppliers are expected to communicate this Code to all employees.  
0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.  
0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- Responsibility for meeting the legal and client code requirements is taken by Md Golam Sohan / Manager (HR, Admin and Compliance).
- The facility communicated this code of conduct (COC) to the suppliers and employees.
- The facility management is conducting internal social compliance audit regularly and take necessary corrective action based on report.
- The facility arranged mid-level management training for all mid-level management employees such as supervisors, quality in charge, production officers, etc.
- The facility conducts orientation training for all new employees.
- The facility conducted training to the employees on ETI base code.
- Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- ETI Base code was posted in the factory premise.

**Evidence examined:**

- Employee handbook.
- Facility Code of Conduct (COC).
- All policies of facility.
- Legal license (Factory, Fire, Trade)
- Internal audit records.
- Management employee training, training attendance record.
- Meeting records.

**Any other comments:**

None

**Management Systems**

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes ☒ No

Please give details:

In the last 12 months the site has not been subjected to any fines or prosecutions for non-compliance to any regulations.

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

☒ Yes ☐ No

Please give details:

It was noted through documentation review, facility has policies and procedures for reduce the risk of forced labor, child labor, discrimination, harassment & abuse.

If Yes, is there evidence (an indication) of effective implementation? Please give details.	Through documents review and workers interview, the written policies (No forced labor, no child labor, Non-discrimination, working hours, health & safety, harassment and abuse) were communicated to the workers as much as factory mid-level management & workers were informed by training via notification board and training.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the managers and workers in the facility have received orientation training where standards for forced labor, child labor discrimination, harassment & abuse are covered.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training records were found including picture and attendance sheet.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: BSCI. Validity : 09/12/2023
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Facility has a dedicated Human Resources department consisting 04 members and is headed by is Md Golam Sohan / Manager (HR, Admin and Compliance)
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Responsibility for meeting the legal and client code requirements is taken by Md Golam Sohan / Manager (HR, Admin and Compliance).
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had adopted a policy decision where by all employees of the company will be required to maintain confidentiality with regard to the affairs of the company & it's greater.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has a confidential information control procedure to keep the information confidential.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility conducted risk assessment evaluates effectiveness of every policy and procedure department wise.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has an internal system to raise the issue found the risk assessment and to implement the way of reduction it.

Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  The facility established a Supplier policy which requires labor standards of its own suppliers.
<b>Land Rights</b>	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Facility has approved building approval from concern authority.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  The facility has anti- corruption committee, anti-bribery policy to support due diligence in applying national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  Not Applicable
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Factory has built at their own land which purchased by following government rules.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  The factory building was approved by government authority as industrial building
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  It was noted through land tenant-ship agreement review and management interview that the facility does not go through illegal appropriation of land for facility building.



Non-Compliance		Evidence																											
<a href="#">[Back to findings summary]</a>																													
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## 1 - Freely chosen Employment

### [Summary of Findings]

#### 1: Compliance Requirements

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

### Current Systems and Evidence Examined

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

#### Current Systems:

- The factory has a policy which prohibits forced labor and this was also available for review.
- Age verification documents (National ID card copy, educational certificate, nationality certificates) were available in employee personal files.
- Service book is provided to every employee.
- Overtime is voluntary.
- The terms and conditions of employment state that the workers are free to leave the workplace outside of their working hours. Facility also has a written policy regarding this.
- The facility did not require any payment for work tools, PPE, IC/staff card, training, etc.
- The facility does not use any prison labor.
- The above was confirmed in management and employees' interviews.

#### Evidence examined:

1. Personnel files
2. Factory policy, rules and regulations, and training records etc.
3. Resignation records
4. Factory rules
5. Employee handbook
6. Management and worker interview

#### Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility has a policy mentioning workers are free to terminate employment from the facility.

<p>If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Not applicable as the yearly turnover of the factory was less than £36m.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No evidence of any restrictions on workers freedoms to leave the site at the end of the workday.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The facility established a policy about forbidden of forced / trafficked / bonded labour and implemented strict management system to control the risk of forced / trafficked / bonded labour in its supply chain. The facility sent agreement of commitment to its suppliers, and operated social responsibility audit on suppliers to control the risk of forced / trafficked / bonded labor in its supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory had provided training and awareness session to all employees to reduce the risk of forced / trafficked labor.</p>



## 2 - Freedom of Association and Right to Collective Bargaining are Respected

### [Summary of Findings]

#### 2: Compliance Requirements

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### Current Systems and Evidence Examined

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

#### Current Systems:

- All the employees are allowed to form or join the trade union of their choice.
- There is no trade union in the facility but there is a Participation Committee formed by election process prescribed by Bangladesh Labour Rules 2015.
- Last Participation Committee election was held on 28th January 2021.
- Regular Participation Committee meeting is held on 26th November 2022.
- Meeting minutes are posted in notice board and recorded in a register.
- There are 05 members from worker's side and 05 from management side with a total of 10 members.
- PC members are members are equally treated with other workers.
- PC members are allowed to carry out their duties within working hours without affecting their pay.

#### 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.

#### Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Participation committee	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory management has provided complain box in the toilet area through which workers can raise their suggestion / complaints. Workers can also approach the management directly for any grievances which confirmed the interviewed workers.	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The PC members able to perform their responsibility without any management intervention.
Name of union and union representative, if applicable:	Not Applicable.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Participation committee
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All workers are aware of their representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2021-01-27
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Facility has conducted last workers committee meeting on 26th of November 2022. Topics discussed during the committee meeting were regarding previous meeting status, New Year activities and new committee preparation etc. Facility shared the meeting minutes with workers through Posted.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

#### 3: Compliance Requirements

- 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

### Current Systems and Evidence Examined

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

#### Current Systems:

##### 1. General Health and Safety management

- Md. Golam Sohan (Safety officer) looks after Health & Safety issues for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets 35 (16 for male and 19 for female) segregated by gender were available at all times for workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings show that there are every two months Health and Safety meeting held. Last meeting on 28th of November 2022.

##### 2. Fire Safety

- Sufficient assembly area was found in front of the facility building.
- Fire-fighting equipment was adequate and checks were up-to-date.
- Fire alarming system was found throughout the factory.

##### 3. 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.

##### 4. Chemical safety

- Facility uses chemical for their production process and provided training and Personal Protection Equipment.

##### 5. Medical services

- There were 05 first aid boxes with enough kits in the full facility.
- Facility has appointed 01 doctor & 01 nurse and they were present in the workplace. They also arrange monthly first aid training with first aiders.
- Facility has a medical room having separate beds for male & female.

##### 6. Building safety

- Factory is operating in 01 building and 01 shed permitted by concern authority.

##### 7. Dormitory

- Facility didn't provide dormitory facilities to any employees.

#### Evidence examined:

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### 3. Fire Drill information:

Type of Fire Drill Date Time Duration No. Participant Conducted By  
Day (Internal) 23-11-2022 02:31 Minutes 519 Md. Golam Sohan (Safety officer)

Facility provide bellow training to employees:

Training Name	Date	No. of Participant	Trainer Name
1. Health & Safety Training	23-11-2022	16	Md Golam Sohan / Manager (HR, Admin and Compliance))
2. Child Labour Training	29-11-2022	15	Md Golam Sohan / Manager (HR, Admin and Compliance)
3. Forced Labour Training	25-11-2022	15	Md Golam Sohan / Manager (HR, Admin and Compliance)
4. Harassment & Abuse training	18-11-2022	26	Md Golam Sohan / Manager (HR, Admin and Compliance)
5. P.P.E training	22-12-2022	16	Md Golam Sohan / Manager (HR, Admin and Compliance))
6. First Aid Training	17-12-2022	08	Medical Officer
7. Fire fighting Training	21-11-2022	10	Md Golam Sohan / Manager (HR
8. Chemical Handling Training	15-12-2022	16	Md Golam Sohan / Manager (HR
9. Awareness Training on Discrimination	19-11-2022	15	Md Golam Sohan / Manager (HR

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### Any other comments:

None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory had adopted health & safety policy which covers PPE, machine safety device, fire safety (fire extinguisher, freighting equipment, hose pipe etc.), emergency pathway, evacuation drill, housekeeping, first aid, electrical safety etc. Last training conducted on 23 of November 2022.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provides workers manual to the workers where all the policies and applicable government law are included.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There were no structural additions without prior permits/inspections.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site kept dedicated PPE for visitors. While any visitor visits in the factory generally, they brief the visitor about H&S policy and provide PPE as and when required.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: They company has provided the medical room facility. There are 02 beds in the medical room 01 for Male and 01 for Female.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility has 01 doctor and 01 nurse are recruited for medical treatment of the employee and trained the first aiders.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Factory does not provide transport facility to their workers.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable as factory did not provide storage space to the workers.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Workers risk assessment is done on a monthly basis according to the training schedule.

<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility meets all the legal obligations on environmental requirement including required permits for use and disposal natural resources like gas etc.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory did not use banned chemicals and follows the entire customer requirement on environmental standard.</p>

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

##### 4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

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

#### Current Systems and Evidence Examined

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

##### Current Systems:

- The facility has established a practice that they will never employ and use any child labor.
- The facility verifies all workers' original national ID card, birth certificate etc. at the time of recruitment and keeps the photocopies of workers' ID cards, birth certificate in their personal files.
- Factory verifies the workers age through registered doctor.
- Sampling basis employees' personal files was taken for review. Each employee file included a bio-data sheet, recent photo, birth registration certificate / photo copied national identification card and other documents.
- There was no child or young employee observed in the facility.

##### Evidence examined:

1. The procedure of <Recruiting regulation> was available for review, the personnel files with ID or birth certificate copy were available for review, the contracts with all the employees were available for audit, and the roster had established by the factory.
2. Document review
3. Management interview
4. Worker interview
5. On-site observation during floor visit

##### Any other comments:

None

Legal age of employment:	14
Age of youngest worker found:	18
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable

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

### 5: Compliance Requirements

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

- Based on the Footwear Gazette Notification, the actual lowest minimum wage in the facility is BDT 7,100 per month.
- Time keeping system is Punch card 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 by Bank & Cash 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 Department and during the worker's interview, it was noted that factory provides all kinds of leave. Maternity leave is 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. Wages and benefits policy
5. Local legal minimum wage documents
6. Payroll records from December 2021, June 2022 and November 2022
7. Leave records
8. Social group insurance
09. Labor contracts for all employees
10. Resignation records
11. Pay slips of all workers interviewed
12. Overtime records

### Any other comments:

None

## Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?



Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	Actual Per Day: 8.0 Per Week: 48.0 Per Month: 208.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 2.0 Per Week: 12.0 Per Month: 52.0	Actual Per Day: 2.0 Per Week: 12.0 Per Month: 50.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 7100.0	Actual Per Day: null Per Week: 0.0 Per Month: 7100.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: null Per Week: null Per Month: 200.0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	42 samples from the month of December 2021 (Initial month) 42 samples from the month of June 2022 (Random month) 42 samples from the month of November 2022 (Current month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The Government has announced the pay structure, which was implemented from 8th September 2020 for the workers of the Leather goods and Footwear Factory. There are two separate pay structures; for the leather workers (Schedule A) 1. For the workers (Schedule A): Grade Monthly basic wage House rent 50% of the basic Medical allowance Conveyance allowance Food subsidy Gross monthly wage Grade 1 Tk. 7780Tk. 3890Tk. 600Tk. 350Tk. 900Tk. 13520 Grade 2 Tk. 5780Tk. 2890Tk. 600Tk. 350Tk. 900Tk. 10520 Grade 3 Tk. 5000Tk. 2500Tk. 600Tk. 350Tk. 900Tk. 9350 Grade 4 Tk. 4450Tk. 2225Tk. 600Tk. 350Tk. 900Tk. 8525 Grade 5 Tk. 3950 Tk. 1975Tk. 600Tk. 350Tk. 900Tk. 7775 Grade 6 Tk. 3500Tk. 1750 Tk. 600Tk. 350Tk. 900Tk. 7100 2. For the staff level (Schedule B) employees: Grade Monthly basic wage House rent 50% of the basic Medical allowance Conveyance allowance Food subsidy Gross monthly wage Grade 1 Tk. 8150Tk. 4075Tk. 600Tk. 350Tk. 900Tk. 14075 Grade 2 Tk. 6300Tk. 3150Tk. 600Tk. 350Tk. 900Tk. 11300 Grade 3 Tk. 5950Tk. 2975Tk. 600Tk. 350Tk. 900Tk. 10775 Grade 4 Tk. 4350Tk. 2175Tk. 600Tk. 350Tk. 900Tk. 8375 Apprentice Tk. 6164		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.			

Please indicate the breakdown of workforce per earnings	0% of workforce earning under minimum wage 40% of workforce earning minimum wage 60% of workforce earning above minimum wage
Bonus Scheme found: Please specify details:	Bonus Scheme found: 1. Facility provides two festival bonuses during Eid- Ul- Fitr and Eid -Ul-Azha to all workers. 2. The factory provides a monthly attendance bonus of BDT. 500 to all the workers. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	As per section 125 of the Bangladesh Labor Law, 2006, Deductions from wages of a worker for absence from the place of worker under section 125(2) (b) may be made only, when he, by the terms of his employment, is required to work, but he is absent for the whole or any part thereof. However, factory is deducting only for un-authorized absence.
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	1. Absent deduction in case of worker is absent as per law. The factory had made deduction for absent.
Please list all deductions that have not been made.	1. Social group insurance. The factory did not deduct for group insurance
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Factory had provided accurate and complete payroll & attendance records to the auditors for review where all working hours were recorded.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Factory review wages yearly. At least 5% of basic wages shall be increased.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Based on employees' interview, copy of appointment letter issued to employees and wage records, it was noted that equal rates were paid for equal work.
How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Good Example		Evidence														
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Explanation to the good example	The factory provides a monthly attendance bonus of BDT. 500 to all the workers.															
Evidence	Payroll record review, worker and Management interview															

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

### 6: Compliance Requirements

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

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

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

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

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

• In this audit, auditor had randomly selected production record, such as: 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 keeping system is Punch Card system.

• All overtime is compensated at a premium rate for all employees.

• The time frame of the records reviewed are as follows:

o 42 samples from the month of December 2021 (Initial month)

o 42 samples from the month of June 2022 (Random month)

o 42 samples from the month of November 2022 (Current month)

According to time records and worker interview basic working hours were 8 hours per day and a max 48 hours per week. OT was 2 hours per day and maximum 12 hours per week found in three sample months. Bangladesh Government has declared a schedule for weekly holiday region wise to save energy as much as possible. The weekly holiday in the zone, where the audited factory is located, has been changed to Sunday as a part of it.

Abiding by this declaration, the facility management also recently (From 15th August 2022) changed the weekend from Friday to Sunday. Note that, since last one year (June 2021 to July 2022) facility weekend was on Friday. In general the employees of work for 6 days in a week (Monday to Saturday). Sunday is weekly holiday.

General working hours in the factory was from 08:00 to 17:00 with 60 minutes break from 13:00 to 14:00. Only security has three shifts per eight hours each with roster schedule of break & weekend.

### Evidence examined:

1. Employee interview

2. Management interview

3. Factory policy on working hours

4. Attendance and wages records from December 2021, June 2022 and November 2022

5. Time keeping system is Punch Card system.

6. Quality and production records to cross check hours.

### Any other comments:

None

## Working hours' analysis

### Systems & Processes

What timekeeping systems are used?	Attendance and work timings (including OT) record was maintained by Punch Card system.		
Is sample size same as in wages section?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable		
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days	<input type="checkbox"/> 2 in 14 days	<input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Maximum number of days worked without a day off (in sample):	6		
<b>Standard/Contracted Hours worked</b>			
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:		
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>Overtime Hours worked</b>			
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: December 2021: 2 hours per day, 12 hours per week and 40 hours per month June 2022: 2 hours per day, 12 hours per week and 50 hours per month November 2022: 2 hours per day, 12 hours per week and 22 hours per month		
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: During Documents review ,workers interview and management interview that no workers worked more than 60 hours found.		
Approximate percentage of total workers on highest overtime hours:	5%		

Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information  Please give details:  Based on the factory policy, rules and regulations, and training records, employee handbook and workers and management interview it was noted that the overtime is voluntary in this factory.		
<b>Overtime premium</b>			
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium  Please give details:  200% of basic wages as overtime rate.		
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  100% workers receive 200% of basic wages as overtime rate every month, if they need to do overtime works.		
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input checked="" type="checkbox"/> No  <input type="checkbox"/> Other	<input type="checkbox"/> Consolidated pay	<input type="checkbox"/> Collective Bargaining agreements
Please give details	Not Applicable		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input checked="" type="checkbox"/> Overtime is voluntary  <input type="checkbox"/> Site can demonstrate exceptional circumstances	<input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary  <input type="checkbox"/> Other reasons (please specify)	<input type="checkbox"/> Safeguards are in place to protect worker's health and safety
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		



## 7 - No Discrimination is Practiced

### [Summary of Findings]

#### 7: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

- 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 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.

#### Evidence examined:

1. The hiring and termination procedure, leave application records and employee handbook.
2. Payroll records
3. Attendance records
4. Termination records
5. Training records
6. Employment contracts were provided for review and they showed that male and female employees were on the same pay grade.
7. Management interview and employee interview.

#### Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 95%	Female: 5%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	As per documents review, management & works interview there is no evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or politics.	
Professional Development		
What type of training and development are available for workers?	All workers are given H&S training, Child Labor training, Forced Labor training, Harassment & Abuse, Discrimination ,different types of machine operation and quality assurance training.	



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

☒ Yes ☐ No

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

### 8: Compliance Requirements

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

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

- All employees were recruited by the factory directly.
- No labor agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditors.
- No subcontractors were used.
- All workers getting signed labor contract and ID card during their recruitment.
- Factory maintains service books for all workers
- 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

### Evidence examined:

1. Factory policy, rules and regulations, employees' personnel files and employees' ID card etc.
2. Management interview and employee interview
3. The hiring and termination records.
4. Worker interview.

### Any other comments:

None

## Responsible Recruitment

### All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- ☒ Terms & Conditions presented ☒ Understood by workers
- ☒ Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

☐ Yes ☒ No

Migrant Workers	
Type of work undertaken by migrant workers:	Not applicable as there was no migrant worker in the facility.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable
Is there any observation on this finding?	Not applicable
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable as all workers were recruited by facility directly.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Not Applicable
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not Applicable



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

#### 8A: Compliance Requirements

8.A.1 There should be no sub-contracting unless previously agreed with the main client.

8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

### Current Systems and Evidence Examined

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

#### Current Systems:

- As per the facility documents review, management, worker interview and factory tour, there was no sub-contractor or home working used by facility currently.
- Therefore, no apparent concern was detected regarding this section.

#### Evidence examined:

- 1.Site tour (Calculation on total production and estimated capacity)
2. Materials in/out records
3. Management interview
4. Worker interview

#### Any other comments:

None

### Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

### Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

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

**9: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The facility has established 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.
- Anti-harassment issue is 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 grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

**Evidence examined:**

1. The relevant policy on prevention of harassment and abuse.
2. Internal grievance procedure documentation.
3. Training records.
4. Management interview and employee interview.

**Any other comments:**

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through direct supervisors, management, and suggestion box.
If yes, are workers aware of these channels and have access? Please give details.	Workers can share their concern with HR officer; drop to their complaint into suggestion box and even go to the top management.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	All workers were aware of these processes; suggestion box was known by the workers; workers can drop their complaints into suggestion box and even go to the top management.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility has no helplines or a whistle-blowing mechanism for business partners.
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Absent deduction in case of worker is absent as per law.

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

**10A: Compliance Requirements**

10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The facility has established 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.
- Anti-harassment issue is 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 grievance box where an employee can report any grievances (harassment, discrimination etc.) anonymously, any received complaint will be handled by management, without any reprisal for the worker in question.

**Evidence examined:**

1. The relevant policy on prevention of harassment and abuse.
2. Internal grievance procedure documentation.
3. Training records.
4. Management interview and employee interview.

**Any other comments:**

None



**10B2 - Environment 2-Pillar**  
**[Summary of Findings]**

**10B2: Compliance Requirements**

10.B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10.B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.

Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- The facility prepared an environmental policy and procedure.
- Waste was segregated by its types and hazard.
- The facility also provides awareness training to all related personnel.

**Evidence examined:**

- Environment policy .
- Wastage management policy.
- Site tour.
- Energy consumption record.

**Any other comments:**

None

## Attachments



The Shoes Bangladesh Ltd. Photo Report.pdf



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