



Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: No Information	Sedex Site Reference: (only available on Sedex System)	ZS: No Information
Business name (Company name):	AVIDA TEKSTIL SAN. VE TIC. A.S.		
Site name:	AVIDA TEKSTIL SAN. VE TIC. A.S.		
Site address: (Please include full address)	Barbaros Mah. Burak Reis Cad. No:4/41 Bornova/ Izmir	Country:	Turkey
Site contact and job title:	Women Woven Outwear		
Site phone:	+90-232-4353757	Site e-mail:	muhassebe@avidatekstil.com.tr
SMETA Audit Type:	☒ Labour Standards	☒ Health & Safety	☒ Environment ☐ Business Ethics
Date of Audit:	22/10/2018		

Audit Company Name & Logo: SMT GLOBAL	Report Owner (payee): AVIDA TEKSTIL SAN. VE TIC. A.S.
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Audit Conducted By					
Commercial	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	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 6.0 April 2017 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.

Any exceptions to this must be recorded here (e.g. different sample size):

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Gokhan Sumer

Team auditor: -

Interviewers: Gokhan Sumer

Report writer: Gokhan Sumer

Report reviewer: Ho Kim Yang

Date of declaration: 22/10/2018

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.

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.

Non-Compliance Table

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i>				Record the number of issues by line*:			NC Findings Only <i>(note to auditor, summarise in as few words as possible NC's only)</i>
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			☐	☐		0	0	•
0B	Management systems and code implementation	☐	☐	☐	☐	0	0	0	•
1.	Freely chosen Employment	☐	☐		☐	0	0	0	•
2	Freedom of Association	☐	☐		☐	0	0	0	•
3	Safety and Hygienic Conditions	☐	☐		☐	0	0	0	•
4	Child Labour	☐	☐		☐	0	0	0	•
5	Living Wages and Benefits	☐	☐		☐	0	0	1	• Food and transportation are provided free of charge.
6	Working Hours	☐	☐		☐	0	0	0	•
7	Discrimination	☐	☐		☐	0	0	0	•
8	Regular Employment	☐	☐	☐	☐	0	0	0	•
8A	Sub-Contracting and		☐	☐	☐	0	0	0	•

	<u>Homeworking</u>								
9	<u>Harsh or Inhumane Treatment</u>	☐	☐		☐	0	0	0	•
10A	<u>Entitlement to Work</u>		☐	☐	☐	0	0	0	•
10B2	<u>Environment 2-Pillar</u>		☐	☐	☐	0	0	0	•
10B4	<u>Environment 4-Pillar</u>		☐	☐	☐	0	0	0	•
10C	<u>Business Ethics</u>		☐	☐	☐	0	0	0	•
General observations and summary of the site:									
Based on satisfactory evidence, it was noted that the audited factory was in full compliance against local law and ETI Base Code requirements.									
Good Examples: 1) Food and transportation are provided free of charge.									

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details	
A: Company Name:	AVIDA TEKSTIL SAN. VE TIC. A.S.
B: Site name:	AVIDA TEKSTIL SAN. VE TIC. A.S.
C: Applicable business and other legally required licence numbers and documents for example, business license no, liability insurance, any other required government inspections	Business License: # 2017-134
D: Products/Activities at site, for example, garment manufacture, electrical, toys, grower	Women Woven Outwear
E: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The factory was established in 2017 and operates women woven outwear (Shirt, pants, skirt etc.) facility in Izmir, Turkey. The ownership of the factory was local and private. The factory occupies 4 floors of a 5-story concrete building with a total production area of 850 square meters. The floor wise description of the factory was as follows: Basement floor: Other Company Ground floor: Other Company 1st floor: Other Company 2nd Floor: Other Company 3rd Floor: Cutting, Ironing, Sewing and Finishing There was no dormitory attached to the factory. No union was established in the factory. The entire workforce of the factory consists of a total 27 employees (7 Male 20 Female), All workers were living domestically and had permanent contracts. The youngest worker was 18 years old in the factory. The factory adopted finger scan attendance system to record employees' clocking in and out hours. The regular working hours of production employees and management staff were from Monday to Friday; from 8:15 a.m. to 6:30 p.m. with 2x15 minutes tea breaks 10:00 a.m. and 4:00 p.m. and 45-minute meal break at 13:00 p.m. Saturdays and Sundays were granted as weekly rest day. The regular monthly salaries were paid in monthly rate to all employees through bank transfer on the 10th of each month.
F: Site function:	☐ Agent ☒ Factory Processing/Manufacturer ☐ Finished Product Supplier

	☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor
G: Month(s) of peak season: (if applicable)	Stable
H: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The process of women woven outwears. The factory had a monthly capacity of 25.000 pcs per month.
I: What form of worker representation / union is there on site?	☐ Union (name) ☒ Worker Committee ☐ Other (specify) ☐ None
J: Is there any night production work at the site?	☐ Yes ☒ No
K: Are there any on site provided worker accommodation buildings e.g. dormitories	☐ Yes ☒ No If yes approx. % of workers in on site accommodation
L: Are there any off site provided worker accommodation buildings	☐ Yes ☒ No If Yes approx. % of workers
M: Were the site provided accommodation buildings included in this audit	☐ Yes ☒ No If No, please give details

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 17:30	Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA
B: Number of Auditor Days Used:	1 auditor x 1 day		
C: Audit type:	☒ Full Initial ☐ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other – Define		
D: Was the audit announced?	☐ Announced ☒ Semi – announced: Window detail: 4 weeks ☐ Unannounced		
E: Was the Sedex SAQ available for review?	☐ Yes ☒ No If No, why not: It was not completed by the factory prior to audit.		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Ms. Cicek Derin - Accounting Responsible		
H: Is further information available (if Y please contact audit company for details)	☐ Yes ☒ No		
I: Previous audit date:	N/A		
J: Previous audit type:	N/A		
K: Was any previous audit reviewed during this audit	☐ Yes ☒ No ☐ N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☐ No
B: Present at the audit?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☐ No
C: Present at the closing meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☐ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Worker representative was present and attended to worker interviews.		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	N/A		

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 and where they do not intend to remain permanently 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*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	7	0	0	0	0	0	0	7
Worker numbers – female	20	0	0	0	0	0	0	20
Total	27	0	0	0	0	0	0	27
Number of Workers interviewed – male	2	0	0	0	0	0	0	2
Number of Workers interviewed – female	8	0	0	0	0	0	0	8
Total – interviewed	10	0	0	0	0	0	0	10

sample size								
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A: Nationality of Management	Turkish
B: Majority nationality of workers	Main countries: Country 1: Turkish approx % total workforce 100 Country 2: _____ approx % total workforce _____ Country 3: _____ approx % total workforce _____
C: Worker remuneration (management information)	_____% workers on piece rate _____% hourly paid workers __100_% salaried workers Payment cycle: _____% daily paid _____% weekly paid __100_% monthly paid _____% other – please give details

Worker Interview Summary	
A: Were workers aware of the audit?	☒ Yes ☐ No
B: Were workers aware of the code?	☒ Yes ☐ No
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	1 Group of 6 Employees
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 2 Female: 2
E: 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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	☒ Yes ☐ No If N, please give details: N/A
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☒ Yes ☐ No

G: In general, what was the attitude of the workers towards their workplace?	☒ Favourable ☐ Non-favourable ☐ Indifferent
H: What was the most common worker complaint?	No specific complaint stated from workers
I: What did the workers like the most about working at this site?	- All workers confirmed that they received at least the minimum wage as salary. - All workers confirmed that they had social insurance. Good deal with administrative staff
J: Any additional comment(s) regarding interviews:	Employees spoke openly and their answers seemed spontaneous and unrehearsed, all workers were free to express their ideas and the attitudes of workers were unfavourable towards the management.
K: Attitude of workers to hours worked:	Comfortable
L. Is there any worker survey information available?	
☒ Yes ☐ No If Yes, please give details: The latest employee satisfaction survey performed in 2018	
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk	
Confidential interviews were conducted with a total of 10 employees (2 male, 8 female) without the presence of factory management in a private room. Employees seemed comfortable with the process and were able to contribute openly. They were not coached for interview. The general attitude of the workers was favourable against management and liked the working environment and with their colleagues/teams. All employees were clear on their contractual status and understood their basic terms and conditions. All could recall having had an induction covering health and safety, hygiene and basic contractual terms. Workers stated that they enjoyed working for the company due to free food, transportation and the good communication with management and the friendly atmosphere.	
N: Attitude of worker's committee/union reps: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk	
There was 1 worker representative onsite who was elected by the workforce without manipulation of the management and the worker representative was taken into audit scope.	
O: Attitude of managers: (Include attitude to audit, and audit process. Both positive and negative information should be included)	
Generally, management was receptive and cooperative during the audit process, they granted access of all sections, docs & workers. Management also allowed auditor to take photos onsite and provided photocopies of relevant documents.	

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to NC-table\)](#)

0.A. Guidance for Observations

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 company conducts employee satisfaction surveys at periodic intervals. The latest Survey performed in 2018. All production processes are carried out within the company and no outsourced production process. Worker representatives are responsible for implementing standards concerning Social Rights.

The factory didn't engage in any form of servitude, forced, bonded, indentured, trafficked or non - voluntary labour. The factory didn't support to inhuman or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

1. Policy documents
2. Legal documents
3. Training records
4. Management interview
5. Worker interviews

A: Policy statement that expresses commitment to respect human rights?

☒ Yes

☐ No

Please give details: The social policy was established and applied for the whole company with high commitment from Factory Owner

B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☒ Yes ☐ No Please give details: Name: Ms. Cicek Derin Job title: Accounting Responsible
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☒ Yes ☐ No Please give details: Internal auditor directly reports to site owner.
D: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☒ Yes ☐ No Please give details: All personal files and information are kept secured in HR department.

Findings		
Finding: Observation ☐ Description of observation: Nothing to report. Local law or ETI/Additional elements / customer specific requirement: Nothing to report. Comments: Nothing to report.	Company NC ☐	Objective evidence observed: Nothing to report.

Good examples observed:	
Description of Good Example (GE): Nothing to report.	Objective Evidence Observed: Nothing to report.

Measuring Workplace Impact

Workplace Impact		
A: 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: (2017) _4.50_ %	This year (2018 until the month of September) __10.15__ %
B: 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 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	21 / (200 + 175) / 2 = 0.071	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year / 2] * number available workdays in the year	Last year 2017: 578 / (911 + 944 / 2) * 303 = 188.82	This year (2018 until the month of September) : 249 / (946 + 994) / 2 * 212 = 54.42
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month	172 / (947 + 944) / 2 * 24 = 4,36	151 / (994+994) / 2 * 24 =3,64
E: Are accidents recorded?	☒ Yes ☐ No Please describe: Accident records were kept. Records of the at least past 2 years are kept.	
F: 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: 2017 41*100/944 Number: 4,01	This year (2018 until the month of September) : 20*100/994 Number : 2,04
G: 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]	Last year: 2017 9*100/944 Number : 0,90	This year (2018 until the month of September) : 14*100/994 Number : 1,76
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	This year: 2017 Number: 578*100/944=41.92	This year (2018 until the month of September) : Number: 249*100/994=20,050
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months __0__% workers	12 months __0__% workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months __0__% workers	12 months __0__% workers

0B: Management system and Code Implementation

[\(click here to return to NC Table\)](#)

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 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.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.4 Suppliers are expected to communicate this Code to all employees.
- 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:

Ms. Cicek Derin / Accounting Responsible was responsible to keep worker turnover rates, absenteeism and such records. Organisational chart and reporting line was determined in the factory. The work instructions, time table, emergency instructions were available in the factory. The facility has its own social policy. The social policy of the facility was announced by means of billboards on the production area of the workers and the card scanning door. Ms. Cicek Derin / Accounting Responsible is obliged to inform suppliers about the company's social procedures and ETL requirement and responsible for their traceability.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Documents checked & comments:

1. Policy documents
2. Legal documents
3. Training records
4. Management interview
5. Worker interviews

Management Systems:

A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	☐ Yes ☒ No Please describe:
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No Please describe: It was verified with document review and management declaration, social compliance policy was established.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Factory has own social requirements procedures, handbook and trainings records.

D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☐ Yes ☒ No Please describe: Employees were aware of ETI Base Code requirements. Training was done together with H&S training.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☒ Yes ☐ No Please describe:
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	☐ Yes ☒ No Please describe: N/A
G: Is there a Human Resources manager/department? If Yes, please detail.	☐ Yes ☒ No Please describe: Ms. Cicek Derin – Accounting Responsible
H: Is there a senior person /manager responsible for implementation of the Code	☒ Yes ☐ No Please describe: Ms. Cicek Derin – Accounting Responsible are responsible for implementation of the ETI Base Code
I: Is there a policy to ensure all worker information is confidential	☒ Yes ☐ No Please describe: Policy on confidentiality was documented.
J: Is there an effective procedure to ensure confidential information is kept confidential	☒ Yes ☐ No Please describe: Information security management system was established in the factory.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☒ Yes ☐ No Details: Risks identified in the risk assessment were eliminated properly and OHS expert of the company followed potential risks regularly.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☒ Yes ☐ No Details: Risks identified in the risk assessment were eliminated properly and OHS expert of the company followed potential risks regularly.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	☒ Yes ☐ No Details: The Firm has informed its suppliers of its own social policy. With the internal controls.

Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☒ Yes ☐ No Details: The facility has business license and a work place opening permit for all production areas
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title	☒ Yes ☐ No Details: Site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	☒ Yes ☐ No If yes, how does the company obtain FPIC: Land rights and FPIC were documented in the internal management system.
Q: Is there evidence that facility site compensated the owner/lessor for the land prior to the facility being built or expanded. Please give details.	☒ Yes ☐ No Details: Land was lawful
R: Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts Please give details.	☐ Yes ☒ No Details: No land acquisition
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ☒ No Details: No evidence of illegal appropriation of land for facility building or expansion of footprint.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

1: Freely Chosen Employment

[\(Click here to return to NC-table\)](#)

ETI

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:

All workers were directly recruited by factory management. 10 personnel files of workers were sampled and found that the factory does not hold any original documents such as official ID cards, educational certificates, etc. Personnel files were documented with worker's job application, appointment letter, personal details and copies of age proof documents. The employment is totally based on the nature of job, skill, experience and expertise. Thus, based on observation and employees interview during audit, it was noted that this factory was in compliance with this section.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Documents checked & comments:

1. Policy documents
2. Personnel files (10 samples)
3. Worker Contracts
4. Worker interviews

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☒ No If Yes please give details and category of workers affected
B: Is there any evidence of a loan scheme in operation	☐ Yes ☒ No If yes please give details and category of worker affected
C: Is there Any evidence of retention of wages /deposits	☐ Yes ☒ No If yes please give details and category of worker affected
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☒ No Please describe finding:
E: If any part of the business is UK based / registered & turnover is	☐ Yes ☐ No

36m+ there is a requirement to publish a 'modern day slavery statement'. F: Is there a modern day slavery statement published	Please describe finding: The Company did not have such a written document as turnover on UK based customer is less than 36m. ☒ Not applicable
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day	☐ Yes ☒ No Please describe finding:
H: Does the site understand the risks of forced / trafficked / bonded labour in it's supply chain	☒ Yes ☐ No If yes please give details and category of workers affected: Factory has supplier assessment procedures in place. All are monitored by accounting responsible – Ms. Cicek Derin ☐ Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☒ Yes ☐ No Please describe finding: Adequate documentation was established.

Non-compliance:

1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against customer code: Nothing to report. Local law and/or ETI requirement: Nothing to report. Recommended corrective action: Nothing to report.	Objective evidence observed: Nothing to report.
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Observation:

Description of observation: Nothing to report. Local law or ETI requirement: Nothing to report. Comments: Nothing to report.	Objective evidence observed: Nothing to report.
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Good Examples observed:

Description of Good Example (GE): Nothing to report.	Objective evidence observed: Nothing to report.
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2: Freedom of Association and Right to Collective Bargaining are Respected

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

- 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:

No union was established in the factory. Employees are free to join any union or association and management does not interfere or restrict worker's choice of joining or forming any union or association. Based on, management and employee interviews, in the factory the workers to elect their representative and employees would freely go to management for any issues or send letters via suggestion boxes for concerns and complaints. There was 1 (one) worker representative which was freely elected by employees to represent themselves to management for the sensitive cases.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Documents checked & comments:

1. Suggestions from the suggestion boxes and actions taken
2. Collective agreement
3. Worker representative election records
4. Worker meeting records
5. Worker interviews

A: What form of worker representation/union is there on site?	☐ Union (name) ☒ Worker Committee ☒ Other (Open door policy) ☐ None
B: Is it a legal requirement to have a union?	☒ Yes ☐ No
C: Is it a legal requirement to have a worker's committee?	☒ Yes ☐ No
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) e.g.	☒ Yes ☐ No Describe: employee's complaint solving procedure, suggestion box, open door policy

H&S, sexual harassment	Is there evidence of free elections? ☒ Yes ☐ No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☒ Yes ☐ No Details:	
F: Name of union and union representative, if applicable:	No unionization activity onsite	Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A
G: If no union what is parallel means of consultation with workers e.g. worker committees?	Open door policy and worker representatives were elected onsite.	Is there evidence of free elections? ☒ Yes ☐ No ☐ N/A
H: Are all workers aware of who their representatives are?	☒ Yes ☐ No	
I: Were worker representatives freely elected?	☒ Yes ☐ No	Date of last election: 10/08/2018
J: Do workers know what topics can be raised with their representatives?	☒ Yes ☐ No	
K: Were worker representatives/union representatives interviewed	☒ Yes ☐ No If Yes , please state how many: 1 worker representative was freely elected by voting.	
L: State any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	The open door policy and worker representative system was effective in the company.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)	☐ Yes ☒ No	
N: If Yes what percentage by trade Union/worker representation	___0 % workers covered by Union CBA	___0 % workers covered by worker rep CBA
O: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	☐ Yes ☐ No N/A	

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

3: Working Conditions are Safe and Hygienic

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

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:

Periodical inspection records of pressured equipment, health check reports, electricity grounding records, health & safety training records, risk analysis record, first aid trained workers' certificates, fire equipment control records etc. were reviewed. The following findings related to this section have been identified

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Ground measurement and periodic internal electricity control of all production areas performed on 03.08.2018 throughout the entire factory.

Drinking water analysis takes place every 2 months, latest analysis was made on 02.08.2018.

Noise, lighting, thermal comfort and vibration measurements were made on 18.02.2018.

Health and Safety Trainings performed weekly for the newly hired employees. Latest was done on 10.07.2018

Contracted workplace doctor and Health and Safety Expert were working with facility.

Any other comments: None

A: Does the facility have general Health & Safety and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☒ Yes ☐ No Details: The factory had adequate HSE procedures in place.
B: Are the policies included in worker's manual?	☒ Yes ☐ No Details: The company's procedures and policies were kept in

	writing, but no manual was established.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☒ No Details: All construction is covered by a valid building license.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☒ Yes ☐ No Details: HSE instructions are provided to visitors upon arrival.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	☒ Yes ☐ No Details: Medical meets the local regulatory requirements and sufficient for this size of workshop.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid	☒ Yes ☐ No Details: There was 2 certified first aiders in the factory.
G: Where facility provides worker transport - it is fit for purpose, safe and maintained and operated by competent persons e.g. buses and other vehicles	☒ Yes ☐ No Details: Transportation was conducted with buses for workers.
H: Secure personal storage space is provided for workers in their living space and is fit for purpose	☒ Yes ☐ No Details: It was verified during to site tour on audit day.
I: H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and there are controls to reduce identified risk	☒ Yes ☐ No Details: Risks identified in the risk assessment were eliminated properly and OHS expert of the company followed potential risks regularly.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources	☒ Yes ☐ No Please describe - wastes are collected and disposed by licensed firms.

K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals	☐ Yes ☒ No Please describe: No chemicals were used in production.
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Non-compliance:		Objective evidence observed:
1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against customer code: Nothing to report.	☐ NC against Local Law	Nothing to report.
Local law and/or ETI requirement: Nothing to report.		
Recommended corrective action: Nothing to report.		

Observation:	
Description of observation: Nothing to report.	Objective evidence observed: Nothing to report.
Local law or ETI requirement: Nothing to report.	
Comments: Nothing to report.	

Good Examples observed:	
Description of Good Example (GE): Nothing to report.	Objective evidence observed: Nothing to report.

4: Child Labour Shall Not Be Used

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

- 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:

Factory verifies the age proof documents and retains copies of these documents on appointment. Auditor verified 10 workers' personnel files where workers have job application, copies of age documentation, contract based on listed terms and conditions signed by parties, educational certificate, etc. and found maintained in all of cases. According to the age documentation of the employees no child labour was found and worker's testimonies support documentary evidence of compliance. There was not any young worker in the factory. The youngest worker was 18 years old.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
Worker list
Personal file
Policy review
Document review
Management interview & Worker interview

A: Legal age of employment	Young workers: The minimum age for employment is defined as 15 -17 as a rule for light work Normal worker minimum age for employment is defined 18 years old.
B: Age of youngest worker found:	18 years old
C: Children present on workfloor but not working at time of audit	☐ Yes ☒ No
D: % of under 18's at this site (of total workers)	0 %
E: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☒ No If Yes give details

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

5: Living Wages are Paid

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key information\)](#)

ETI

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:

Company pays salaries of employees on 10th day every month through bank transfer. A review of pay records yielded that the legal minimum wage was granted for all workers. During the audit, auditor selected 10 sampled employees' payroll records including 10 records from September 2018, 10 records from July 2018, 10 records from January 2018. No illegal deduction from wage. There was social insurance deduction from Government requirement.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. Time and payroll review
2. Document review (Leaves, insurance premiums, payslips, taxes, etc.)
3. Worker interview

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 45 hours per week for adults 40 hours for the workers between 15 - 18 years old.	45 hours per week for adults 40 hours for the workers between 15 - 18 years old.	☐ Yes ☐ No N/A
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 270 hours per year	Daily maximum 7.5 hrs Weekly maximum 10 hrs Annual 157 hrs	☐ Yes ☐ No N/A
D: wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 2.029,50 TL/Month (Gross), 1.603,12 TL (Net) Since January 2018	2029,50 TL/month minimum (Gross) for permanent workers	☐ Yes ☐ No N/A
E: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150% of hourly wage for each working practice duration over	Comply with legal requirements. Legal minimum: 150% of hourly wage for each	☐ Yes ☐ No N/A

	45 hours/week. (This is the only overtime wage premium defined in Turkish labour law)	working practice duration over 45 hours/week. (This is the only overtime wage premium defined in Turkish labour law)	
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Wages analysis:

[\(Click here to return to Key Information\)](#)

A: Were accurate records shown at the first request?	☒ Yes ☐ No	
B: If No , why not?	N/A	
C: 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)	Auditor selected 10 sampled employees' payroll records including 10 records from September 2018, 10 records from July 2018, 10 records from January 2018 to check.	
D: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ☒ No	If Yes , please give details:
E: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☒ N/A	If No , please give details:
F: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	Lowest Wages found: <i>Note: full time employees and please state hour / week / month etc.</i> ☐ Below legal min ☒ Meet ☒ Above	Please indicate the breakdown of workforce per earnings: The legal minimum wage: 1.404,06 TL/month The legal min-wage was paid for the lowest paid worker. In addition; hourly overtime wage was calculated with (Salary/225)x1 formula in the company. (Legal requirement formula is (Salary/225)x1,5.) for workers. ____% of workforce earning under min wage _60_% of workforce earning min wage _40_% of workforce earning above min wage
G: Bonus (amount specify)	Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i> There was no extra bonus payment system for workers in the	

	company.
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, tax, unemployment benefit for insured workers
I: Have these deductions been made? Please list all deductions that have/have not been made.	☒ Yes ☐ No If No, please describe
J: Were appropriate records available to verify hours of work and wages?	☒ Yes ☐ No
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☒ No ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☒ Yes ☐ No Details: Time records were available in the company on the audit day to verified workers working hours.
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered Yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	☐ Yes ☒ No Please specify amount/time: N/A
If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: N/A
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☐ Yes ☒ No Details:
O: Are workers paid in a timely manner in line with local law?	☒ Yes ☐ No
P: Is there evidence that equal rates are being paid for equal work:	☒ Yes ☐ No Details: It was verified with worker interviews and management declaration.
Q: How are workers paid:	☐ Cash ☐ Cheque ☒ Bank Transfer ☐ Other

If other explain:

6: Working Hours are not Excessive

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

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:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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:

The factory adopted card scan attendance system to record employees' clocking in and out hours. The regular working hours of production employees and management staff were from Monday to Friday; from 8:15 a.m. to 6:30 p.m. with 2x15 minutes tea breaks 10:00 a.m. and 4:00 p.m. and 45 minutes meal break at 13:00 p.m. Saturdays and Sundays were granted as weekly rest day.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. Time and payroll records review
2. Daily production records
3. Employee interview

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

Working hours' analysis

Please include time e.g. hour/week/month

[\(Go back to Key information\)](#)

Systems & Processes

A. What timekeeping systems are used: time card etc.

Describe: Factory had used finger scan attendance system to record working time for employees.

B: Is sample size same as in wages section

☒ Yes

☐ No

If N, please give details

C: Are standard/contracted working hours defined in **all**
☒ Yes

☐ No

If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Details

contracts/employment agreements?					
D: Are there any other types of contracts/employment agreements used?	☐ Yes ☒ No	If YES, please complete as appropriate:			
		☐ 0 hrs	☐ Part time	☐ Variable hrs	☐ Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week	☐ Yes ☒ No	If Y please %detail hours, % and types of workers & affected and frequency Details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	Please select all applicable: ☒ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:		Is this allowed by local law? ☒ Yes ☐ No		
	Maximum number of days worked without a day off (in sample): 6 days				
	Employees had one day off per 7-day-period working. Normally employees worked 6 days per week.				
Standard/Contracted Hours worked					
G: Standard working hours over 48 per week found	☐ Yes ☒ No	If yes, % of workers & frequency			
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☐ Yes ☒ No	If YES, please give details			

Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 12 hours per week	
J: Combined hours (standard/contracted plus= total) 60 found?	☐ Yes ☒ No Maximum hours were 57 hours including overtime.	
K: Approximate percentage of total workers on highest overtime hours	__0__%	
L: Is overtime voluntary?	☒ Yes ☐ No ☐ Conflicting Information	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	☒ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of standard wages: 150% of normal hourly rate for regular overtime and additional daily rate for national holiday workings.
N: Is overtime paid at a premium?	☒ Yes ☐ No	If yes, please describe % of workers & frequency: %25 only during peak months.
O: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	☐ No ☐ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) ☐ Collective Bargaining agreements ☐ Other	
	Please explain any checked boxes above e.g. detail of consolidated pay CBA or Other	
	N/A	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the	☐ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons (please specify) N/A	

boxes where relevant. Multi select is possible.	Please explain any checked boxes above N/A
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☒ No If yes, please describe
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☒ Yes ☐ No

7: No Discrimination is Practiced

[\(Click here to return to NC-table\)](#)

ETI

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 was 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.

No discrimination in any aspect according to interviews

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

The discrimination prohibition policy.

The factory tour

Worker interview

Notice board

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: __30 % Female__70 %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst	#: 0
C: 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?:	☐ Hiring ☐ Compensation ☐ access to training ☐ promotion ☐ termination or retirement N/A

Professional Development	
A: What type of training and development are available for workers?	Please give details: job skill training, firefighting and preventing training, hygienic and labour safety training.

B: Are HR decisions on e.g. promotion, training, compensation based on objective, transparent criteria?	☒ Yes ☐ No If no, please give details:
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Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against customer code: Nothing to report. Local law and/or ETI requirement: Nothing to report. Recommended corrective action: Nothing to report.	Objective evidence observed: Nothing to report.

Observation:	
Description of observation: Nothing to report. Local law or ETI requirement: Nothing to report. Comments: Nothing to report.	Objective evidence observed: Nothing to report.

Good Examples observed:	
Description of Good Example (GE): Nothing to report.	Objective evidence observed: Nothing to report.

8: Regular Employment Is Provided

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

ETI

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:

Workers were given continuous employment. 10 sampled worker's employment files and contracts were reviewed and the terms and conditions were found as per law. All workers were local workers and have social security insurance on-time.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Documents checked & comments:

1. Employee interview
2. Management interview
3. Document review

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Nothing to report.

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

Responsible Recruitment

All Workers

A: 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

If any are unchecked, please describe finding and specific category(ies) of workers affected:

B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?

- ☐ Yes
- ☒ No

If Yes Please describe details and specific category (ies) of workers affected N/A

C: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ Service fees ☐ Application costs ☐ Recommendation fees ☐ Placement fees ☐ Administrative, overhead or processing fees ☐ Skills tests ☐ Certifications ☐ Medical screenings ☐ Passports/ID's ☐ Work / resident permits ☐ Birth certificates ☐ Police clearance fees ☐ Any transportation and lodging costs after employment offer ☐ Any transport costs between work place and home ☐ Any relocation costs after commencement of employment ☐ New hire training / orientation fees ☐ Medical exam fees ☐ Deposit bonds or other deposits ☐ Any other non-monetary assets ☐ Other
C: If any checked, give details:	N/A

Migrant Workers:

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 and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

A: Type of work undertaken by migrant workers:	N/A	
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: 0 Total number of (outside of local country) recruitment agencies used: 0	
C: Migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and evidence of transaction is supplied by the facility to the worker.	☐ Yes ☒ No Please describe finding:	Observations
D: Are Any migrant workers in skilled, technical, or management roles Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	☐ Yes ☒ No If Yes number and example of roles	

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees	☐ Yes ☒ No
B: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ Service fees ☐ Application costs ☐ Recommendation fees ☐ Placement fees ☐ Administrative, overhead or processing fees ☐ Skills tests ☐ Certifications ☐ Medical screenings ☐ Passports/ID's ☐ Work / resident permits ☐ Birth certificates ☐ Police clearance fees ☐ Any transportation and lodging costs after employment offer ☐ Any transport costs between work place and home ☐ Any relocation costs after commencement of employment ☐ New hire training / orientation fees ☐ Medical exam fees ☐ Deposit bonds or other deposits ☐ Any other non-monetary assets ☐ Other
C: If any checked, give details:	

Agency Workers (if applicable)	
<i>(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.)</i>	
A: Number of agencies used (average):	And names if available: N/A
B: Were agency workers' age/pay/hours included within scope of this audit	☐ Yes ☐ No
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No Details N/A

E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No Please describe: N/A
---	---

Contractors:

Note: 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,

A: Any contractors on site?	☐ Yes ☒ No Please describe finding: If Y, how many contractors are present
B: If Yes, how many workers supplied by contractors	No Contractor
C: Do all contractor workers understand their terms of employment?	☐ Yes ☒ No Please describe finding:
D: If Yes, please give evidence for contractor workers being paid per law:	N/A

8A: Sub-Contracting and Homeworking

[\(Click here to return to NC-table\)](#)

[\(Click here to return to Key Information\)](#)

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

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

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting : auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

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:

Through management interview and document review, no subcontractors were used by the factory.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

1. Document review
2. Factory tour
3. Management interview
4. Worker interview
5. Subcontractor audit reports

If any processes are sub-contracted – please populate below boxes

Process Subcontracted	None.
Name of factory	N/A
Address	N/A

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Nothing to report.

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:
Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:
Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

Summary of sub-contracting – if applicable
☒ Not Applicable please x

A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours or undeclared sub-contracting

☐ Yes

☒ No

Please describe:

N/A

B: If sub-contractors are used, is there evidence this has been agreed with the main client?

☐ Yes

☒ No

If **Yes**, summarise details: N/A

C: Number of sub-contractors/agents used

0

D: Is there a site policy on sub-contracting?

☐ Yes

☒ No

If **Yes**, summarise details: N/A

E: What checks are in place to ensure no child labour is being used and work is safe?

N/A

Summary of homeworking – if applicable
☒ Not Applicable please x

A: If homeworking is being used, is there evidence this has been agreed with the main client?

☐ Yes

☐ No

If **Yes**, summarise details:

B: Number of homeworkers

Male:

Female:

Total:

C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents
D: If through agents, number of agents	N/A
E: Is there a site policy on homeworking?	☐ Yes ☐ No
F: How does site ensure worker hours and pay meet local laws for homeworkers?	N/A
G: What processes are carried out by homeworkers?	N/A
H: Do any contracts exist for homeworkers	☐ Yes ☐ No Please give details: N/A
I: Are full records of homeworkers available at the site?	☐ Yes ☐ No

9: No Harsh or Inhumane Treatment is Allowed

[\(Click here to return to NC-table\)](#)

ETI

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.

Additional elements:

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

A: 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 3 rd party?	☒ Yes ☐ No Please describe:
B: If Yes , are workers aware of these channels and have access? Please give details.	Workers were well trained on grievance system.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion/complaint boxes
D: Is there a grievance mechanism in place for:	☒ Workers ☐ Communities ☐ Suppliers ☐ Other Details: Suggestion/complaint boxes /Open door policy Worker

	Committee
E: Are there any open disputes?	☐ Yes ☒ No If yes, please give details
F: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	☒ Yes ☐ No If no, please give details
G: Does the site \ encourage its business partners (e.g., suppliers) provide individuals and communities with access to effective grievance mechanisms (e.g., help lines or whistle blowing mechanism	☒ Yes ☐ No If No Please give details
H: Is there a published and transparent disciplinary procedure	☒ Yes ☐ No If No please explain
I: If yes, are workers aware of these the disciplinary procedure	☒ Yes ☐ No If no please give details
J: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)	☐ Yes ☒ No If Yes please give details

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:

During the worker interview and document review no physical abuse, sexual or other harassment were noted at the factory.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Documents checked & comments:

1. Policy review
2. Worker interview
3. Management interview

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

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

10A.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:

Factory did not employ any immigrant workers. Employees' ID card was reviewed before hiring and a copy of the ID card were recorded in the personnel file.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. Policy review
2. Factory tour
3. Management interview
4. Document review
5. Worker interview

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

10. Other issue areas 10B2: Environment 2–Pillar

[\(Click here to return to NC-table\)](#)

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

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

10B2.2 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:

During this audit, 10 (ten) sampled worker's employment files and contracts were reviewed and the terms and conditions were found as per law. All workers were local workers and have social security insurance on-time. Confirmed with interviews and document review in accordance with SMETA Best Practice Guidance and Local Law.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Environmental protection policy

Factory tour

Worker interview

Management interview.

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against customer code:

Nothing to report.

☐ NC against Local Law

Local law and/or ETI requirement:

Nothing to report.

Recommended corrective action:

Nothing to report.

Objective evidence observed:

Nothing to report.

Observation:

Description of observation:

Nothing to report.

Local law or ETI requirement:

Nothing to report.

Comments:

Nothing to report.

Objective evidence observed:

Nothing to report.

Good Examples observed:

Description of Good Example (GE):

Nothing to report.

Objective evidence observed:

Nothing to report.

10C: Business Ethics - Other Findings Outside the Scope of the Code

Nothing to report.

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

Nothing to report.

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary." ☒ Not Applicable please x	
NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.	Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
0.A. Guidance for Observations 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.	N/A
0.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation
0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this	N/A

Code. 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.	
ETI 1. Forced Labour	ETI 1. Forced Labour
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.	N/A
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
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.	N/A
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
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	N/A

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.	
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
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.	N/A
ETI 5. Living wages are paid	ETI 5. Living wages are paid
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.	N/A
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
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.	N/A

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: – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 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.	
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
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.	N/A
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
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	N/A

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.	
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.	N/A
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
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. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers	N/A
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.	N/A

10. Other issue areas 10B2: Environment 2–Pillar	
10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits. 10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. <i>Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.</i>	N/A

Photo Form

		
Factory Outlook	Sewing Section	Cutting Section
		
Ironing Section	Warehouse	Accessories

		
Canteen	Finger Attendance System	Emergency Evacuation Signs
		
Changing Room	Fire Hose	Fire Extinguisher
		
First Aid Kits	Fire Alarm Button	Drinking Water



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)