

# Sedex Members Ethical Trade Audit Report





| Audit Details  |  |   |  |                      |          |                       |  |
|--|--|---|--|----------------------|----------|-----------------------|--|
| Sedex Company<br>Reference:<br>(only available on Sedex<br>System) | ZC: 420746556  |   | Sedex Site Re<br>(only availab<br>Sedex Systen | ole on               | ZS:420   | 839177                |  |
| Business name<br>(Company name):                                   | Premium Textile Mills Limited (Socks Division)             |   |  |                      |          |                       |  |
| Site name:   | Premium Textile Mills                                      | s Limi                                      | ited (Socks Div                                | vision)              |          |                       |  |
| Site address:<br>(Please include full<br>address)                  | Plot # 142-157, Mair<br>Superhighway, Noc<br>abad-Jamshoro | , Noori                                     |  |                      | Pakistan |                       |  |
| Site contact and job title:  | Mr. Umer Ali- Mana   | ger C                                       | Compliance                                     |                      |          |                       |  |
| Site phone:  | 0092 320 6547667   |   | Site e-mail:                                   |                      | Umer.    | alipremiumtextile.com |  |
| SMETA Audit Pillars:   | ∑ Labour<br>Standards                                      | Health & Safety (plus Environment 2-Pillar) |  | Environment 4-pillar |          | Business Ethics       |  |
| Date of Audit:   | 20/09/2022.  |   |  |                      |          |                       |  |
|  |  |   |  |                      |          |                       |  |
|  |  |   |  | Poport               | Owner    | (navar).              |  |

| Audit Company Name & Logo:  Intertek Pakistan (Pvt) Ltd. | Report Owner (payer): (If paid for by the customer of the site please remove for Sedex upload)  Premium Textile Mills Ltd (Socks Division) |
|--|--|
|--|--|

| Audit Conducted By         |  |           |                |                       |    |  |  |
|----------------------------|--|-----------|----------------|-----------------------|----|--|--|
| Affiliate Audit<br>Company |  | Purchaser |                | Retailer              |    |  |  |
| Brand owner                |  | NGO       |                | Trade Union           |    |  |  |
| Multi–<br>stakeholder      |  |           | Combined Audit | (select all that appl | у) |  |  |

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact <a href="mailto:grievance@sedex.com">grievance@sedex.com</a>.

To confirm the validity of this report, please visit <a href="https://www.sedex.com/audit-verifier/">https://www.sedex.com/audit-verifier/</a>



#### **Audit Content:**

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 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): Muhammad Waseem Awan, Syed Usman Ali, Tabish Khan.

Lead auditor: Muhammad Waseem Awan APSCA number: RA 21701567

Lead auditor APSCA status: Registered Auditor

Team auditor: Syed Usman Ali, Tabish Khan APSCA number: ASCA 21703797,

ASCA 21705393

Interviewers: Tabish Khan, Muhammad Waseem Awan

APSCA number: RA 21701567, ASCA 21705393

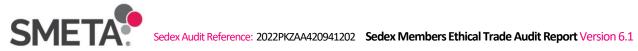
Report writer: Muhammad Waseem Awan RA 21701567)

Report reviewer: Gangadharaiah M.K(Reviewer)

Date of declaration: 20/09/2022.

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.



# **Summary of Findings**

| Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained. |  | Area of Non-Conformity (Only check box when there is a non- conformity, and only in the box/es where the non-conformity can be found) |           |                        | Record the number of issues by line*: |    |     | Findings<br>(note to auditor, summarise in as few words as<br>possible NCs, Obs and GE) |  |
|---|--|---|-----------|------------------------|---------------------------------------|----|-----|---|--|
|   |  | ETI Base<br>Code  | Local Law | Additional<br>Elements | Customer<br>Code                      | NC | Obs | GE  |  |
| 0A  | Universal Rights covering UNGP             |   |           |                        |                                       |    | 01  | 0   | Factory does not have policy for human rights, endorse at the highest level, covering human rights impacts and issues.   |
| ОВ  | 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             |   |           |                        |                                       | 02 | 0   | 0   | <ul> <li>During site visit, it was noted that 04 workers in knitting section has not worn ear plugs and face masks which were provided by the facility.</li> <li>During site visit, it was noted that safety glasses of 20% knitting machines were not installed of knitting machines</li> </ul> |
| 4   | Child Labour                               |   |           |                        |                                       | 0  | 0   | 0   |  |
| 5   | Living Wages and Benefits                  |   |           |                        |                                       | 0  | 0   | 0   |  |

Date: 20/09/2022 Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01



| 6    | Working Hours                      |  |  | 0 | 0 | 0 |  |
|------|------------------------------------|--|--|---|---|---|--|
| 7    | <u>Discrimination</u>              |  |  | 0 | 0 | 0 |  |
| 8    | Regular Employment                 |  |  | 0 | 0 | 0 |  |
| 8A   | Sub-Contracting and<br>Homeworking |  |  | 0 | 0 | 0 |  |
| 9    | <u>Harsh or Inhumane Treatment</u> |  |  | 0 | 0 | 0 |  |
| 10A  | Entitlement to Work                |  |  | 0 | 0 | 0 |  |
| 10B2 | Environment 2-Pillar               |  |  | 0 | 0 | 0 |  |
| 10B4 | Environment 4–Pillar               |  |  | 0 | 0 | 0 |  |
| 10C  | Business Ethics                    |  |  | 0 | 0 | 0 |  |
|      |                                    |  |  |   |   |   |  |

### General observations and summary of the site:

### Site Summary:

- The products manufactured at this site are Knitted Socks
- Overall responsibility for meeting the standards is taken by the Umer Ali-Manager Compliance
- The youngest worker on site was 21-year-old.
- There is no union at this factory.
- Joint Work Council was present at the audit, but management did not invite them in opening and closing meetings.
- There is 100% male in management and among supervisor.
- Site has consistent business throughout the year. 26 workers were selected for interview including 21 males and 05 females, they were interviewed as 01 group of 05 and the balance of 06 workers were interviewed individually.
- All workers said they were satisfied with their employment at the factory.
- They also said they were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used.
- 26 Records to show wages and hours were taken for last 3 months (August 2022, July 2022, June 2022) from the period of three months June 2022 August 2022.
- Standard hours on site were on average 48 hours/month with 1 day off in every 7-day-period.



- Legal minimum wages are paid to all workers in accordance with local law.
- Correct OT rate were paid, Workers were paid 200% of minimum wage for normal OT hours, 300% for gazette / festival holiday.

\*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.

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01 Date: 20/09/2022



# **Site Details**

|   | Site Details  |  |              |                                       |  |  |  |  |
|---|---|--|--------------|---------------------------------------|--|--|--|--|
| A: Company Name:  | Premium Textile Mills   | Premium Textile Mills Ltd (Socks Division)         |              |                                       |  |  |  |  |
| B: Site name:   | Premium Textile Mills   | Premium Textile Mills Ltd (Socks Division)         |              |                                       |  |  |  |  |
| C: GPS location:<br>(If available)  | GPS Address: Plot # 142-157, Main Superhighway, Noori abad-Jamshoro  Longitude: 67.73053  |  |              |                                       |  |  |  |  |
| D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | National Tax # 0698852-9 Labour Registration # RDL/L/FTY/H-2904. EOBI Registration # AIG00029AI003 SESSI Registration # 08-23-0140 All above certificates are valid and there is expiry.  |  |              |                                       |  |  |  |  |
| E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc   | Yarn Receiving-Yarn Inspection-Knitting-Finishing- Packing-<br>Dispatch.  |  |              |                                       |  |  |  |  |
| F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)   | Premium Textile Mills Ltd (Socks Division) is manufacturer of Knitted Socks, located at Plot # 142-157, Main Super highway, Noori abad-Jamshoro -Pakistan was established in 2021 with covered area of 85633 Square ft. There were 02 building block For below, please add any extra rows if appropriate. |  |              |                                       |  |  |  |  |
|   | Production<br>Building no 1   | Descriptio   | n            | Remark, if any                        |  |  |  |  |
|   | Ground Floor  | Yarn Store<br>Inspection<br>Managen<br>offices. Cl | n, Knitting, | N/A                                   |  |  |  |  |
|   | First Floor   | Finishing, I<br>MD Area.                           | Packing      | N/A                                   |  |  |  |  |
|   | Second Floor  | Warehous dispatch.                                 | e and        | NA                                    |  |  |  |  |
|   | Is this a shared building?  | None   |              | The facility has independent building |  |  |  |  |
|   | Production Building no 2  | Descriptio   | n            | Remark, if any                        |  |  |  |  |
|   | Ground Floor, First<br>Floor, Second<br>Floor, Third Floor<br>and Fourth Floor  | Worker Do  | ormitory     | N/A                                   |  |  |  |  |
|   | Is this a shared building?  | None   |              | The facility has independent building |  |  |  |  |
|   | F1: Visible structural Yes No F2: Please give deta F3: Does the site hav  | iils: NA   | , -          |                                       |  |  |  |  |



|   | <ul> <li>Yes</li> <li>No</li> <li>F4: Please give details: Facility has obtained building stability certificate on "Form K" from A.A Associates (P.E.C number 32073) for factory building and in this certificate above firm certified that the they have carried out a detailed survey of the building and material which was found satisfactory and is in accordance with the recognized standards required by the Architects and builders and further that the coercion has been carried out in such a way as to give the building reasonable stability and to provide the maximum safety in working the machines housed in the building.</li> </ul> |
|---|---|
| G: Site function:   | ☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor   |
| H: Month(s) of peak season:<br>(if applicable)  | Consistent Business   |
| I: Process overview:<br>(Include products being produced, main<br>operations, number of production lines,<br>main equipment used) | Products: Knitted Socks Main Operation: Yarn Receiving-Yarn Inspection-Knitting- Finishing- Packing- Dispatch. Production Lines: 01 Main Equipment: Facility has installed 144 N, 168 N & 108 N Knitting machines, 05 Techno pea, 02 Triventa Dryer Production Capacity: 260000 Pairs / month.  |
| J: What form of worker representation / union is there on site?   | ☐ Union (name) ☑ Worker Committee (Joint Work Council) ☐ Other (specify) ☐ None   |
| K: Is there any night production work at the site?  | ☐ Yes ☐ No  |
| L: Are there any on site provided worker accommodation buildings e.g. dormitories   | Yes No L1: If yes, approx. % of workers in on site accommodation  |
| M: Are there any off site provided worker accommodation buildings   | Yes No M1: If yes, approx. % of workers   |
| N: Were all site-provided accommodation buildings included in this audit  | Yes No N1: If no, please give details: <b>Not applicable</b>  |
|   |   |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

Date: 20/09/2022



| Audit Parameters  |   |   |   |  |  |  |  |
|---|---|---|---|--|--|--|--|
| A: Time in and time out   | A1: Day 1 Time in:<br>09:00 AM<br>A2: Day 1 Time out:<br>17:00 PM                                 | A3: Day 2 Time in: N/A<br>A4: Day 2 Time out: N/A | A5: Day 3 Time in: N/A<br>A6: Day 3 Time out: N/A |  |  |  |  |
| B: Number of auditor days used:   | 2.5 ( 03 auditor on 01 day  | /1)   |   |  |  |  |  |
| C: Audit type:  | Full Initial Periodic Full Follow-up Partial Follow-Up Partial Other If other, please define:     |   |   |  |  |  |  |
| D: Was the audit announced?   | ☐ Announced ☐ Semi – announced: Window detail: 04 weeks (01/09/2002 to 30/09/ 2022) ☐ Unannounced |   |   |  |  |  |  |
| E: Was the Sedex SAQ available for review?  |   |   |   |  |  |  |  |
| F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?                            | ☐ Yes ☐ No If <b>Yes</b> , please capture detail in appropriate audit by clause                   |   |   |  |  |  |  |
| G: Who signed and agreed CAPR (Name and job title)  | Mr. Umer Ali-Manager Compliance   |   |   |  |  |  |  |
| H: Is further information<br>available<br>(If yes, please contact audit<br>company for details) | ☐ Yes ☐ No  |   |   |  |  |  |  |
| I: Previous audit date:   | None  |   |   |  |  |  |  |
| J: Previous audit type:   | N/A   |   |   |  |  |  |  |
| K: Were any previous audits reviewed for this audit   | ☐ Yes ☐ No ☒ N/A  |   |   |  |  |  |  |



| Audit attendance   | Management   | Worker Representati              | Orker 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 representatives were not present during opening and closing meeting as they were busy in their production task. But were available during audit day activity for interview. |                                  |                       |  |  |
| E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)  | There was no union in the facility.  |                                  |                       |  |  |



# **Worker Analysis**

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

| Worker Analysis                        |           |           |        |           |           |        |              |       |
|--|-----------|-----------|--------|-----------|-----------|--------|--------------|-------|
|  |           | Local     |        | Migrant*  |           |        |              | Total |
|  | Permanent | Temporary | Agency | Permanent | Temporary | Agency | Home workers |       |
| Worker numbers –<br>Male               | 143       | 0         | 0      | 0         | 0         | 0      | 0            | 143   |
| Worker numbers –<br>female             | 0         | 0         | 0      | 0         | 0         | 0      | 0            | 0     |
| Total                                  | 143       | 0         | 0      | 0         | 0         | 0      | 0            | 143   |
| Number of Workers interviewed – male   | 26        | 0         | 0      | 0         | 0         | 0      | 0            | 26    |
| Number of Workers interviewed – female | 0         | 0         | 0      | 0         | 0         | 0      | 0            | 0     |
| Total – interviewed sample size        | 26        | 0         | 0      | 0         | 0         | 0      | 0            | 26    |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01 Date: 20/09/2022



| A: Nationality of Management   | Pakistani  |  |
|--|--|--|
| B: Please list the nationalities of all workers, with the three most common nationalities listed first.  Please add more nationalities as applicable to site. Add more rows if required. | Nationalities: B1: Nationality 1: Pakistani B2: Nationality 2: None B3: Nationality 3: None  | Was the list completed during peak season?  ☐ Yes ☐ No  If no, please describe how this may vary during peak periods: NA |
| C: Please provide more information for the three most common nationalities.  | C: approx % total workforce: Nationality 1 : 100%<br>C1: approx % total workforce: Nationality 2 : None<br>C2: approx % total workforce: Nationality 3: None   |  |
| D: Worker remuneration (management information)  | D: 0% workers on piece rate D1: 0% hourly paid workers D2: 100% salaried workers  Payment cycle: D3: 0% daily paid D4: 0% weekly paid D5: 100% monthly paid D6: 0% other D7: If other, please give details |  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01 Date: 20/09/2022



| Worker Interview Summary  |   |               |  |  |  |  |  |
|---|---|---------------|--|--|--|--|--|
| A: Were workers aware of the audit?   | ☐ Yes<br>☑ No   |               |  |  |  |  |  |
| B: Were workers aware of the code?  | ⊠ Yes<br>□ 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)   | 04 Groups of 05 workers= 20  No COVID-19 patient history in facility. Facility is taking all the preventive measures in the COVID-19 situation. |               |  |  |  |  |  |
| D: Number of individual interviews<br>(Please see SMETA Best Practice Guidance and Measurement<br>Criteria)   | D1: Male: 06  | D2: Female: 0 |  |  |  |  |  |
| 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.  Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment | <ul><li>Yes</li><li>No</li><li>If no, please give details</li></ul>   |               |  |  |  |  |  |
| F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?  | ⊠ Yes<br>□ No   |               |  |  |  |  |  |
| G: In general, what was the attitude of the workers towards their workplace?  | <ul><li>☐ Favourable</li><li>☐ Non favourable</li><li>☐ Indifferent</li></ul>   |               |  |  |  |  |  |
| H: What was the most common worker complaint?   | No specific complaint from workers.   |               |  |  |  |  |  |
| I: What did the workers like the most about working at this site?   | On time payment and good working environment.   |               |  |  |  |  |  |
| J: Any additional comment(s) regarding interviews:  | None  |               |  |  |  |  |  |
| K: Attitude of workers to hours worked:   | Satisfactory  |               |  |  |  |  |  |
| L. Is there any worker survey information available?  |   |               |  |  |  |  |  |
| Yes No L1: If yes, please give details:   |   |               |  |  |  |  |  |
| 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

10 workers were selected for interview including all 26 male employees; they were interviewed as 01 groups of 4 and the balance of 06 workers were interviewed individually. The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They could make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns, such as food quality / health and safety to their worker representative who would take it to the worker management committee.

#### 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

During audit interview was conducted with the members of "Joint Work Council" Worker representatives were found happy and comfortable with management attitude. Worker representatives did not share any negative information about the factory management.

#### O: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they took notice of the findings of the internal audit team and had implemented a Health & Safety committee to take care of health and safety concerns. Umer Ali-Manager Compliance is responsible for implementing legal and code standards. He is also responsible to conduct internal audits. Management of the facility found very co-operative and positive towards audit process and showed commitment to fulfil all pointed out non-conformances on immediate basis.

Date: 20/09/2022



# **Audit Results by Clause**

#### 0A: Universal Rights covering UNGP

(Click here to return to summary of findings)

#### 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:**

- Facility has not defined policy endorsed at the highest level covering human rights impacts and issues and it is communicated to all appropriate parties and suppliers.
- Facility has designated person Umer Ali- Manager Compliance to implement standards concerning human rights.
- Facility has identified its stakeholders and salient issues.
- Facility has measure direct and indirect impacts and potential impacts on stakeholders.

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

#### Details:

- Policy on human rights covering the UNGP.
- Suppliers and stakeholder list and record

Any other comments: None

| A: Policy statement that expresses commitment to respect human rights? | Yes No A1: Please give details: Facility has not defined policy endorsed by top level management to respect human rights. |
|--|---|
|  | respect nomairingins.   |

Date: 20/09/2022

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01



ETI/Additional elements requirement:

Comments:

appropriate parties, including its own suppliers.

| Description of observation: obse   |   | Objective evidence observed: Document review |
|--|---|--|
| Findings:  |   |  |
| E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?   | ☐ Yes ☐ No E1: Please give details: Fac procedure for privacy of wo                       |  |
| D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement) | <ul><li>         ∑ Yes         ☐ No         D1: If no, please give details     </li></ul> | 6  |
| C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?                                  | Yes No C1: Please give details: Fac system for confidential repo                          | •  |
| B: Does the business have a designated person responsible for implementing standards concerning Human Rights?  | Yes No Please give details: Name: Mr. Umer Ali ob title: Manager Complian                 | nce  |

| Good examples observed: None      |                                 |
|-----------------------------------|---------------------------------|
| Description of Good Example (GE): | Objective Evidence<br>Observed: |

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

Factory was not updated on new requirements on human rights.



**Measuring Workplace Impact Table** 

| 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)   | A1: Last year: NA  | A2: This year 2022<br>1.5%        |  |
| B: Current % quarterly (90 days) turnover:<br>Number of workers leaving from the first day of the<br>90 days period through to the last day of the 90<br>day period / [(number of employees on the 1st day<br>of 90 day period + number of employees on the<br>last day of the 90 day period) / 2] | 0.375%   |                                   |  |
| C: Annual % absenteeism:  Number of days lost through job absence in the year /  [(number of employees on 1st day of the year + number employees on the last day of the year) / 2]  * number available workdays in the year  | C1: Last year: NA  | C2: This year: 2022<br>2.0        |  |
| D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month   | 0.50%  |                                   |  |
| E: Are accidents recorded?   | Yes No E1: Please describe: There is no accident, however facility has recorded injuries record. |                                   |  |
| F: Annual Number of work-related accidents and injuries per 100 workers: [(Number of work-related accidents and injuries * 100) / Number of total worke rs]  | F1: Last year: N/A<br>Number: N/A  | F2: This year: 2022<br>Number: 1% |  |
| 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]   | 0.25%  |                                   |  |
| H: Lost day work cases per 100 workers:<br>[(Number of lost days due to work accidents and<br>work-related injuries * 100) / Number of total<br>workers]   | H1: Last year: 0   | H2: This year: 0                  |  |
| I: % of workers that work on average<br>more than 48 standard hours / week in<br>the last 6 / 12 months:   | I1: 6 months<br>15% workers  | I2: 12 months<br>12% workers      |  |
| J: % of workers that work on average<br>more than 60 total hours / week in the<br>last 6 / 12 months:  | J1: 6 months<br>0% workers   | J2: 12 months<br>0% workers       |  |



### **0B: Management system and Code Implementation**

(Click here to return to summary of findings)

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:**

- Factory has established, documented, maintained, and effectively communicated Social compliance policy and procedure in its social Compliance manual. As per policy "Premium Textile Mills Ltd (Socks Division)" is committed to provide a workplace environment complying and compatible with all applicable laws. The facility discourages discrimination, employment of child and forced labor, harassment/abuse or corporal punishment and all other activities that contradict with local laws and buyer's code of conduct.
- Local government departments like Labor department and Civil defence departments are conducting bi-annually inspections at the factory.
- Facility is aware on local laws concerning child labor, forces labor, wages, compensations, health
  and safety, working hours, abuse and harassment, environments etc. Facility obtains law updates
  from labor department and has subscription of different law websites like
  (www.pakistanlawsite.com) recent update has been received from labor departments for
  revision of minimum wages (The Punjab Gazette 30/06/2022).
- Facility has appointed Mr. Umer Ali- Manager Compliance to ensure implementation of local law and international labor standards requirement and during interview Mr. Umer Ali- Manager Compliance found aware of all requirements.
- Facility is conducting internal audits on quarterly basis to ensure effectiveness of social policy and procedure last internal audit was conducted on 20-21/07/2022.
- The factory has taken written commitment from all its suppliers to comply with social compliance code of conduct.
- In the last 12 months, facility is not subject to any fines / prosecution for noncompliance confirmed during management interviews.
- Workers are being trained on ETI base code & labor law requirements on quarterly basis through awareness sessions also facility is providing orientations sessions to all workers at the time of hiring, last awareness session was conducted on 29/07/2022.

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

Date: 20/09/2022

### Details:

- Social Compliance Management System Manual.
- Job Description of Manager Compliance
- Facility visit and check notices boards for communication of code with workers
- Internal audits record
- Compliance Certificate

Any other comments: None



| 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 A1: Please give details: Facility is not subject to fine from any authority for non-compliance   |  |
| B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?  | Yes No B1: Please give details: Facility has defined policies and procedures against forced labour, child labour, discrimination, harassment, and abuse.  |  |
| C: If Yes, is there evidence (an indication) of effective implementation? Please give details.   | Policies exist for all areas (child labor, forced labor, Health and Safety, Living Wage, Working Hours, no harsh treatment, Environment and Business Ethics); these are communicated to workers via poster and quarterly trainings last was conducted dated 29/07/2022.   |  |
| D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?   | Yes No D1: Please give details: Facility has provided training to all managers and workers on forced labour, child labour, discrimination, harassment & abuse.  |  |
| E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details  | <ul> <li>Yes</li> <li>No</li> <li>E1: Please give details:</li> <li>Orientation training to all new hires.</li> <li>Quarterly training sessions last was conducted on 29/07/2022. Workers were found familiar with facility policies during worker interviews.</li> </ul> |  |
| 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<br>☑ No<br>F1: Please give details:   |  |
| G: Is there a Human Resources manager/department? If Yes, please detail.   | Yes No G1: Please give details: Mr. Umer Ali- Manager Compliance of the factory who is responsible for overall HR matters.  |  |
| H: Is there a senior person / manager responsible for implementation of the code   | Yes No H1: Please give details: Mr. Umer Ali- Manager Compliance responsible for implementing of ETI code.  |  |



| I: Is there a policy to ensure all worker information is confidential?   | Yes No I1: Please give details: Workers personal data confidentiality clause found written on worker's employment contract.   |  |
|--|---|--|
| J: Is there an effective procedure to ensure confidential information is kept confidential?  | <ul> <li>         ∑ Yes         ☐ No         J1: Please give details: Worker information / personal files are kept under lock and key at HR office.     </li> </ul> |  |
| K: Are risk assessments conducted to evaluate policy and procedure effectiveness?  | ☐ Yes ☐ No K1: Please give details: Risk assessment and internal audits are being conducted to evaluate effectiveness of policy and procedures.                     |  |
| 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 L1 Please give details: Issues pointed out during risk assessment and internal audit are brought to the attention of senior management and correction made.  |  |
| M: Does the facility have a policy/code which require labour standards of its own suppliers?   | Yes No M1: Please give details: Facility has developed supplier selection policy and procedure, which require them to adhere labor standards.                       |  |
| Land rights  |   |  |
| N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?  | Yes No N1: Please give details: Facility has all required business licenses, approved building layout plans required to run the business.                           |  |
| 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 O1: Please give details: Facility is implementing Factories Act 1934 for land right issues.  |  |
| 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 P1: If yes, how does the company obtain FPIC:  |  |
| Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.   | ∑ Yes<br>□ No   |  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01 Date: 20/09/2022



|   | Q1: Please give details: agreement of land.                                       | Facility showed the sale   |
|---|---|--|
| R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?                               | Yes No R1: Please give details:   |  |
| S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.  | Yes No S1: Please give details: appropriation of land for expansion of footprint. | •  |
| Non–complian  | ce: None  |  |
| 1. Description of non–compliance:  NC against ETI/Additional Elements  NC against customer code:  ETI requirement/Additional Element:  Recommended corrective action: | ainst Local Law   | Objective evidence observed: (where relevant please add photo numbers) |
|   |   |  |
| Observation: None   |   |  |
| Description of observation:   |   | Objective evidence   |
| Local law or ETI requirement:   |   | observed:  |
| Comments:   |   |  |
| Good Examples observed: None  |   |  |
| Description of Good Example (GE):   |   | Objective evidence observed:   |



#### 1: Freely Chosen Employment

(Click here to return to summary of findings)

#### **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:**

- Based on the policy review, employment relationship is in voluntary basis for both regular and overtime work.
- As the evidence of voluntary basis for regular work the facility practices as below: on hiring process the facility requires all hiring documents such as employment contract that explicitly affirming statement that applicants are seeking employment voluntarily and are not under of any penalty. This employment contract is signed by employee and HR department and kept on personnel file. The facility verifies original documents such as copy of national ID card, copy of school certificate, and only keeps copies of employees' original documents.
- The employees worked overtime on voluntary basis. Based from the employees' interviews, it was noted that they have a right to refuse overtime work.
- There is no evidence that employees' freedom of movements is necessarily impeded.
- The employees are free to leave once their shift ends.
- The employees are given reasonable time off to pray.
- The employees are not bonded or indentured.
- The employees are issued their wages directly.
- No prison labour is employed at the facility.

| Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate): |
|--|
| Details:   |
| Policy and Procedure on no forced labour is reviewed by the auditor.   |
| Any other comments: Nil  |
|  |
|  |

| A: Is there any evidence of retention of original documents, e.g. passports/ID's | Yes No A1: If yes, please give details and category of workers affected: Employees are only required to submit copies of original documents at the time of hiring. |
|--|--|
|  |  |

Date: 20/09/2022



| B: Is there any evidence of a loan scheme in operation   | Yes No B1: If yes, please give details and category of workers affected: Employees informed that no loan scheme is in operation.  |
|--|---|
| C: Is there any evidence of retention of wages /deposits   | Yes No C1: If yes, please give details and category of workers affected: Employees confirmed during interview, facility does not retain any part of wages/deposits.   |
| D: Are there any restrictions on workers' freedom to terminate employment?   | Yes No D1: Please describe finding: Employees are free to move when required.   |
| E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement? | ☐ Yes ☐ No E1: Please describe finding: ☐ Not applicable  |
| F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?                                      | Yes No F1: Please describe finding: Employees are free to leave when shift ends.  |
| G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain   | ☐ Yes☐ No☐ Solution Control of the Solution of Solution Control o |
| H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?   | ☐ Yes ☐ No H1: Please describe finding: None  |



| Non-compliance: None  |  |
|---|--|
| 1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code:  Local law and/or ETI requirement | Objective evidence observed: (where relevant please add photo numbers) |
| Recommended corrective action:  |  |
|   |  |
|   |  |
| Observation: None   |  |
| Description of observation:   | Objective evidence   |
| Local law or ETI requirement:   | observed:  |
| Comments:   |  |
|   |  |
|   | I.   |
| Good Examples observed: None  |  |
| Description of Good Example (GE):   | Objective evidence observed:   |



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

(Click here to return to summary of findings) (Click here to return to Key Information)

#### FTI

- 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
- 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:**

- Factory has defined freedom of association policy and procedure in its social compliance manual, as per policy "Premium Textile Mills Ltd (Socks Division)" respects the just, legal, ethical, and social rights, facilities and needs of all employees. Purely on non-discriminatory basis, all employees of the company possess freedom and right to associate and collectively bargain by just, ethical, and legal means to protect their rights. On parallel means, all employees are free to elect their representatives for their rights protections.
- Currently there is no worker union however facility has constituted Joint Work Council as a parallel means. Factory has constituted a Joint Work Council comprising of 05 workers and 02 management representatives. Workers representatives were elected by the workers through secret balloting, while management representatives were nominated by the management. Last election held on 20/06/2022 for a period of two years.
- The council meets monthly and discusses the worker's issues and complaints and gives its recommendations to the management for the rectification of the issues. Last meeting of the council was conducted on 12/09/2022. Record of the same was verified during audit.

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

#### Detail:

- Freedom of Association policy and procedure
- Joint Work Council election records
- Joint Work Council meeting minutes
- Interviews and discussion with workers and council representatives

Any other comments: None

| A: What form of worker representation/union is there on site? | ☐ Union (name) ☑ Worker Committee (Joint Work Council) ☐ Other (specify) ☐ None |
|---|---|
| B: Is it a legal requirement to have a union?                 | ∑ Yes<br>□ No   |

Date: 20/09/2022



|   | In accordance with Industrial Relation Ordinance 2010 workers have the right to form Union or worker Council. In factory there is Joint Worker Council, which is in accordance with local law.  |  |  |
|---|---|--|--|
| C: Is it a legal requirement to have a worker's committee?  | ⊠ Yes<br>□ No   |  |  |
| D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)              | <ul> <li>Yes</li> <li>No</li> <li>D1: Please give details:</li> <li>Suggestion and complaint boxes</li> <li>Sexual Harassment committee</li> <li>HSE Committee</li> <li>D2: Is there evidence of free elections?</li> <li> ☐ Yes</li> <li>No</li> </ul> |  |  |
| E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?   | Yes No E1: Please give details: In accordance with Sindh Industrial Relation Ordinance 2013 workers have the right to form Union or worker Council. In factory there is Worker Council, which is in accordance with local law.                          |  |  |
| F: Name of union and union representative, if applicable:   | NA  | F1: Is there evidence of free elections?  Yes No N/A |  |
| G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?   | Joint Work Council  | G1: Is there evidence of free elections?  Yes No N/A |  |
| H: Are all workers aware of who their representatives are?  | ⊠ Yes □ No  | Workers are familiar about their representatives.    |  |
| I: Were worker representatives freely elected?  | ⊠ Yes □ No  | I1: Date of last election: 20/06/2022 for two years. |  |
| J: Do workers know what topics can be raised with their representatives?  | ⊠ Yes □ No  |  |  |
| K: Were worker representatives/union representatives interviewed?   | ∑ Yes □ No     If <b>Yes</b> , please state how many: 01  |  |  |
| L: Please describe any evidence that union/worker's committee is effective?  Specify date of last meeting; topics covered; how minutes were communicated etc. | Joint Work Council Last meeting of the council was held on 12/09/2022, Meeting minutes were posted at production floors and available to workers, and Last meeting topics covered health and safety.  |  |  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

C-3913-01 Date: 20/09/2022



| M: Are any workers covered by Collective Bargaining Agreement (CBA)?   | ☐ Yes ⊠ No                        |  |
|--|-----------------------------------|--|
| If <b>Yes</b> , what percentage by trade Union/worker representation   | M1:% workers covered by Union CBA | M2:% workers covered by worker rep CBA         |
| M3: If <b>Yes</b> , does the Collective<br>Bargaining Agreement (CBA)<br>include rates of pay?                             | Yes No                            |  |
|  |                                   |  |
|  | Non-compliance: None              |  |
| 1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:  Local / ETI requirement: |                                   | Objective evidence observed: Worker Interviews |
| Recommended corrective action:   |                                   |  |
|  |                                   |  |
|  | Observation: None                 |  |
| Description of observation:  |                                   | Objective evidence observed:                   |
| Local law or ETI requirement:  |                                   | observed.                                      |
| Comments:  |                                   |  |
|  |                                   |  |
| Good Examples observed: None   |                                   |  |
| Description of Good Example (GE):  |                                   | Objective evidence observed:                   |



### 3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(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:**

- Factory has defined Health and Safety policy and procedure in its social compliance manual as per policy "Company's core priority is to provide employees with neat and clean, safe and healthy environment. Company's facilities include availability of edible items including potable water, separated toilets, tidy and unpolluted air, noise safety, adequate lighting, installation of firefighting, first aid and other emergency equipment and related drills / trainings''.
- Facility has appointed Mr. Umer Ali- Manager Compliance to ensure proper implementation, monitoring and training of H&S requirements.
- Facility has established Environment Health, safety (EHS) committee with 10 members selected from all departments Environment, Health and safety committee meets monthly and discusses health and safety issue and provide their recommendation to management for rectification last meeting held on 13/09/2022.
- Factory has obtained firefighting equipment inspection certificate dated 19/05/2022 from District Civil Defence Headquarters Faisalabad valid till 20/05/2022 According to this certificate factory has installed enough firefighting equipment in accordance with local law.
- Facility has obtained building stability certificate on "Form K" from A.A Associates (P.E.C number 32073) for factory building and in this certificate above firm certified that the they have carried out a detailed survey of the building and material which was found satisfactory and is in accordance with the recognized standards required by the Architects and builders and further that the coercion has been carried out in such a way as to give the building reasonable stability and to provide the maximum safety in working the machines housed in the building.
- Facility has obtained electric installation inspection report dated 02/08/2022 and according to this
  report electric installation at Premium Textile Mills Ltd (Socks Division) were properly protected and
  secured as per local law.
- The factory conducts quarterly evacuation drill, latest drill was conducted on 01/07/2022 start time is 12:00:00 hours and Ended at 12:02:00. Average evacuation time of fire drills is 2:00 minutes.
- Facility has provided health safety trainings as (Firefighting on 01/07/2022, first aid on 06/07/22, Use of Machine Safety on 16/07/22, PPE's & chemical handling on 14/07/22, to all relevant employees.

Date: 20/09/2022



- Facility has installed 20 fire extinguishers (120 DCP, 60 CO2, 30 AAAF,06 Fire Trolleys), 53 Fire Alarms,
   121 Smoke detectors, 09 Fire Hydrants and 17 Hose Reels 20 Fire Buckets, 10 Gas mask, 15 Safety
   Helmets, 01 Emergency Stair, 01 Breathing Operatus.
- Facility has trained 14 trained fire fighters and 18 first aiders.
- Factory has mounted 15 first aid kits with enough supplies in all departments.
- Two fire exits were available for each factory workshop and evacuation maps were found posted at each section.
- There were total 63 toilets for workers.
- Facility has obtained microbiological test of drinking water (Ref # 23167/PTML/2022/FAC-003 dated 24/06/2022 from Evergreen Environmental Laboratory for the compliance of WHO drinking water standards.
- Facility has (Ref # 23167/PTML/2022/FAC-003 dated 24/06/2022 from Evergreen Environmental Laboratory.
- Facility has Ambient Air monitoring reports (Ref # 23167/PTML/2022/FAC-003 dated 24/06/2022 from Evergreen Environmental Laboratory
- Factory has appointed 01 electricians. Training and academic certificates were reviewed during the audit.
- The general EHS conditions such as hygiene, lighting and ventilation etc. were all acceptable.

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

#### Details:

- Health and safety policy and procedure.
- Certificate of building stability
- Electrical installation inspection report
- Evacuation drill records
- Firefighting equipment inspection certificate
- EHS trainings like first aid, firefighting, chemical Safety and Use of PPEs and Machine Safety records
- Injury and accident records for the year 2022.
- Health and safety inspection reports.
- Machineries and equipment inspection reports.
- Fire safety list of equipment
- Machine maintenance record.
- Test reports of drinking water
- Workers hygiene cards and vaccination reports.

Any other comments: None

| A: Does the facility have general and occupational Health & Safety policies          | ⊠Yes   |
|--|--|
|  | □No  |
| and procedures that are fit for purpose<br>and are these communicated to<br>workers? | Please give details: Facility have general Health & Safety and occupational Health & Safety policies and procedures. Employees are communicated about the policies and procedures through employee handbook and notice board |
|  | ⊠ Yes  |
| B: Are the policies included in workers' manuals?                                    | □No  |
|  | Please give details: employees are communicated about the policies and procedures through employee handbook and notice board.  |



| C: Are there any structural additions without required permits/inspections (e.g. floors added)?                    | ☐ Yes  |
|--|--|
|  | ⊠No  |
| (o.g. noors added) :   | Please give details: No additions to building structures without permits/inspections   |
| D: Are visitors to the site informed on  | ⊠ Yes  |
| H&S and provided with personal protective equipment  | □No  |
| protective equipment   | Please give details: A visitor handbook provided to all visitors and personal protective equipment provided where necessary. |
| Et la a modical room or modical facility   | Yes  |
| E: Is a medical room or medical facility provided for workers?   | ⊠ No   |
| If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers. | Please give details: Facility does not provide medical room in the facility.   |
|  | ⊠ Yes  |
| F: Is there a doctor or nurse on site or there is easy access to first aider/trained medical aid?                  | □No  |
| Trained Medical didy   | Please give details: There is easy access to first aider/ trained medical aid; there are 01 first aiders in each area.       |
|  | Yes  |
| G: Where the facility provides worker transport - is it fit for purpose, safe,                                     | ⊠ No   |
| maintained and operated by competent persons e.g. buses and other vehicles?  | Please give details: facility has not provided transport for employees.  |
| III le cocure personal storage en acc  | Yes  |
| H: Is secure personal storage space provided for workers in their living   | ⊠No  |
| space and is it fit for purpose?   | Please give details: Personal storage space is not provided for employees.   |
| I: Are H&S Risk assessments conducted  | ⊠ Yes  |
| (including evaluating the arrangements   | □No  |
| for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?      | Please give details: Last risk assessment conducted on 01/07/2022.   |
| It is the site meeting its legal obligations   | ⊠ Yes  |
| J: Is the site meeting its legal obligations on environmental requirements   | □No  |
| including required permits for use and disposal of natural resources?  | Please give details: Facility is meeting the local law   |
|  | requirements on environmental requirements including required permits for use and disposal of natural resources.             |
|  | Tradelica politilis for ose and disposal of flatoral resources.  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

ce: PAK-3913-01 Date: 20/09/2022

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| K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals? |  |
|---|--|
|   | Please give details: No chemicals/banned chemicals used by the facility. |
|   |  |
|   |  |

| chemicals?   | Please give details: No chemicals/bar the facility.  | nned chemicals used by                 |
|--|--|--|
|  |  |  |
|  | Non-compliance:  |  |
| Description of non-compliance:     NC against ETI  | Local Law NC against customer  | Objective evidence observed: site tour |
| During site visit, it was noted that 04 workers in knitting section has not worn ear plugs and face masks which were provided by the facility.  Local law and/or ETI requirement:  In accordance with Rule 12 (c) of the Hazardous Substances Rules, 2003: Protective clothing and equipment comprising helmet or cloth cap, safety spectacles or goggles, respirators or masks, rubber or plastic gloves and work boots, shall be available for all workers who may be exposed to hazardous substance, and no workers shall permit on job unless and until he is wearing such protective clothing and equipment.  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.  Recommended corrective action:  'It was recommended that facility should provide awareness on the use of PPE's  Timescale: 30 days Desktop  Responsible person: Mr. Umer Ali- Manager Compliance  Status: Closed on 13th October 2022 |  | See NC Photo # 1                       |
| 2. Description of non-compliance:  \[ \text{NC} \text{ NC} \text{ against ETI}  \text{NC} \text{ against code:} \]  During site visit, it was noted that safety gonot installed of knitting machines  Local law and/or ETI requirement:  In accordance with Rule 54 of The Punjaparts of transmission machinery shall be streach of workers (1) All shafts, couplings, adriving straps, chains and ropes, except Inspector by construction or position equation that the factory as they should be if securely for ETI requirement:  3.1 A safe and hygienic working environment the prevailing knowledge of the industry as steps shall be taken to prevent accident associated with, or occurring in the couple reasonably practicable, the causes of environment.  Recommended corrective action:   | lasses of 20% knitting machines were  ab Factories Rules, 1978: The following ecurely fenced if in motion and within collers, clutches, toothed wheels, pulley of such as are in the opinion of the ally safe to every person employed in enced or guarded.  nent shall be provided, bearing in mind and of any specific hazards. Adequate ats and injury to health arising out of, are of work, by minimising, so far as is | See NC Photo # 2                       |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

Date: 20/09/2022

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It was recommended that facility should install safety glasses of all relevant

machines.

Timescale: 30 days Desktop

Responsible person: Mr. Umer Ali- Manager Compliance

Status: Closed on 13th October 2022

| Observation: None              |                              |  |
|--------------------------------|------------------------------|--|
| Description of observation:    | Objective evidence observed: |  |
| Local law or ETI requirement:  | observed.                    |  |
| Recommended corrective action: |                              |  |
|                                |                              |  |

| Good Examples observed: None      |                                 |
|-----------------------------------|---------------------------------|
| Description of Good Example (GE): | Objective Evidence<br>Observed: |



#### 4: Child Labour Shall Not Be Used

(Click here to return to summary of findings) (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:**

- As supporting documentation, copies of identity documents on the personal files are required to be submitted by all applicants at hiring process by the facility; such documents are:
  - o National identity card
  - School certificate
  - Birth certificate
- All employees are found to be above the age of 19 years old.
- No recruitment for child labour as per company policy and local law.
- No child found to be working in the facility.

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

### Details:

- Policy and procedure on child labour.
- Personal Files
- National identity card
- School certificate
- Birth certificate
- Job application

Any other comments:

, Nil

| A: Legal age of employment:   | 14 years      |
|---|---------------|
| B: Age of youngest worker found:  | 20 years      |
| C: Are there children present on the work floor but not working at the time of audit? | ☐ Yes<br>☑ No |



| D: % of under 18's at this site (of total workers)  |  |  |  |
|---|--|--|--|
| E: Are workers under 18 subjects to hazardous work assignments?  (Go to clause 3 – Health and Safety)  Yes  No  If yes, please give details |  |  |  |
| Non-compliance: None  |  |  |  |
| 1. Description of non-compliance:  NC against ETI  NC against Local Law  NC against customer code:  Local law and/or ETI requirement:       | Objective evidence observed: (where relevant please add photo numbers) |  |  |
| Recommended corrective action:  |  |  |  |
|   |  |  |  |
| Observation: None   |  |  |  |
| Description of observation:   | Objective evidence   |  |  |
| Local law or ETI requirement:   | observed:  |  |  |
| Comments:   |  |  |  |
|   |  |  |  |
| Good Examples observed: None  |  |  |  |
| Description of Good Example (GE):   | Objective Evidence<br>Observed:  |  |  |



#### 5: Living Wages are Paid

(Click here to return to summary of findings) (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:**

- The facility provided hours and wages records from June 2022-August 2022, for 03 months (August 2022, July 2022 and June 2022). 26 employees were selected for checking time records and payments records for the Month August 2022 (Current Month), July 2022 (Random Month) and June 2022 (Random Month)
- The local legal minimum wage was Rs.25000/month and Rs. 961.53 per day. Average monthly paid salary was PKR 27000 per month.
- Employees are also provided pay slips and payment is made timely.
- All employees' wages were calculated by monthly rate and by piece rate wages. The minimum wage paid by the facility was Rs.25,000 per month according to the provided wage records,
- Time records are properly maintained for all employees.
- Employee old age benefits contribution and social security contribution of all employees are checked from for last three months.
- Benefits of paid, annual leaves, sick leaves and casual leaves were given to employees as confirmed by documented records and employees' interviews.
- All employees were paid on or before 7th of each month by bank transfer and through cash.
- No overtime working was found in the facility, but factory has established a policy to pay overtime at double than the normal wage rate.
- Facility is paying gratuity to the workers at time of their resignation or end of their services. For verification 05 full and final settlement cases reviewed for verification.

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

#### Details:

- Employee interview
- Local and national laws
- Wages and benefits policy Procedure
- Local legal minimum wage documents
- Payroll records from August 2022 (Current Month), July 2022 (Random Month) and June 2022 (Random Month)

Date: 20/09/2022

- Leave records
- Social insurance
- Resignation records



| Any other comments: None  |  |  |
|---|--|--|
| Non-compliance: None  |  |  |
| 1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:  Local law and/or ETI requirement:  Recommended corrective action: | Objective evidence observed: (where relevant please add photo numbers) |  |
|   |  |  |
| Observation: None   |  |  |
| Description of observation:   | Objective evidence observed:   |  |
| Local law or ETI requirement:   | observed:  |  |
| Comments:   |  |  |
|   |  |  |
| Good Examples observed: None  |  |  |
| Description of Good Example (GE):   | Objective Evidence<br>Observed:  |  |



**Summary Information** 

| Criteria   | Local Law<br>(Please state legal<br>requirement) | Actual at the Site (Record site results against the law)                                    | Is this part of a<br>Collective<br>Bargaining<br>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:<br>48 hours/week                  | A1: 48 hours  | A2:<br>☐ Yes<br>☑ No  |
| B: Overtime hours:<br>(Maximum legal and actual overtime hours, please<br>state if possible per day, week, and month)                                      | Legal maximum:<br>12 hours/week                  | B1: Overtime<br>not observed in<br>sample months  | B2:<br>☐ Yes<br>☑ No  |
| C: Wage for standard/contracted hours:<br>(Minimum legal and actual minimum wage at site,<br>please state if possible per hr, day, week, and month)        | Legal minimum:<br>PKR 20,000 per<br>month        | C1: PKR 25,000  | C2:<br>☐ Yes<br>☑ No  |
| D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)                          | Legal minimum:<br>200% of normal<br>wage/hour    | D1: PKR 240.38<br>per hours which<br>is 200% per hour<br>for normal days<br>overtime hours. | D2:<br>□ Yes<br>☑ No  |

| Wages analysis:  (Click here to return to Key Information)  |  |   |  |
|---|--|---|--|
| A: Were accurate records shown at the first request?  | ∑ Yes<br>□ No  |   |  |
| A1: If <b>No</b> , why not?   | Not Applicable   |   |  |
| B: Sample Size Checked<br>(State number of worker records<br>checked and from which weeks/months<br>– should be current, peak, and<br>random/low. Please see SMETA Best<br>Practice Guidance and Measurement<br>Criteria) | 26 samples from August 2022(Current Month) 26 samples from July 2022 (Random Month) 26 samples from June 2022 (Random Month) |   |  |
| C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.   | ☐ Yes<br>☑ No  | C1: If <b>Yes</b> , please give details: Not Applicable |  |
| D: If there are different legal minimum grades, are all workers graded and paid correctly?  | ☐ Yes<br>☐ No<br>☑ N/A   | D1: If <b>No</b> , please give details: Not Applicable  |  |
| E: For the lowest paid production workers, are wages paid for standard/contracted hours   | Below legal  | E1: Lowest actual wages found: PKR 25000/<br>Month      |  |

Date: 20/09/2022

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

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| (excluding overtime) below or above the legal minimum?  | ⊠ Meet<br>□ Above  |   |       |            |   |
|---|--|---|-------|------------|---|
| F: Please indicate the breakdown of workforce per earnings:   | F1: 0% of workforce earning under minimum wage F2: 100% of workforce earning minimum wage F3: 0% of workforce earning above minimum wage |   |       |            |   |
| G: Bonus Scheme found:<br>Please specify details:   | Bonus Scheme found: One gross salary of bonus per year to all employees who completed at least 90 days.                                  |   |       |            |   |
| H: What deductions are required by law e.g. social insurance? Please state all types:   | Employees  | s Old Ag  | ge Be | enefit Con | tribution   |
| I: Have these deductions been made?   | ∑ Yes<br>□ No  | 11: Please list all deductions that have been made. |       | s that     | Employees Old Age Benefit     Contribution                      |
|   |  |   |       |            | Please describe: Facility deducts Rs.130 for EOBI contribution. |
|   |  | I2: Please list all deductions that have not been   |       | s that     | Punjab Employee's Social     Security Institution               |
|   |  | made.   |       |            | Please describe: None   |
| J: Were appropriate records available to verify hours of work and wages?  | ∑ Yes<br>☐ No  |   |       |            |   |
| K: Were any inconsistencies found?  | Yes  |   |       | K1: Type   |   |
| (if yes describe nature)  | <ul><li>No</li><li>Poor record keeping</li><li>Isolated incident</li><li>Repeated occurrence:</li></ul>                                  |   |       |            |   |
| L: Do records reflect all time worked?<br>(For instance, are workers asked to<br>attend meetings before or after work<br>but not paid for their time)   | Yes No L1: Please give details: All time worked is being recorded and records provided for review.                                       |   |       |            |   |
| M: Is there a defined living wage: 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. | ☐ Yes ☐ No M1: Please specify amount/time:   |   |       |            |   |



| M2: 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: Not applicable |
|---|--|
| 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 N1: Please give details: Minimum wage is being reviewed annually by government during Financial Budget.   |
| 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 P1: Please give details: All employees paid according to their skill set.   |
| Q: How are workers paid:  | <ul> <li>☐ Cash</li> <li>☐ Cheque</li> <li>☐ Bank Transfer</li> <li>☐ Other</li> <li>Q1: If other, please explain:</li> </ul>  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

erence: PAK-3913-01 Date: 20/09/2022



#### 6: Working Hours are not Excessive

(Click here to return to summary of findings) (Click here to return to Key Information)

#### FTI

- 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 <u>all</u> 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:**

- Through employees' interview, overtime is voluntary.
- The facility provided hours and wages records of Month August 2022 (Current Month), July 2022 (Random Month) and June 2022 (Random Month). 26 employees were selected for checking time records and payments records for the Month August 2022 (Current Month), July 2022 (Random Month) and June 2022 (Random Month)
- Card Scanning machine is used for time recording of all employees. According to time records and employees interview basic working hours were 8 hours per day.
- 1 day (Off on Sunday) is provided to all employees.

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

#### Details:

- 26 Employees' interviews
- Management interview



- local and national laws
- Facility policy on working hours and Procedure
- Timecards of 26 sample workers.
- Employees contracts of 10 workers.
- Dispatch and receiving records to cross check hours

Any other comments: None

| Non-compliance: None  |  |  |
|---|--|--|
| 1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:  Local law and/or ETI requirement:  Recommended corrective action: | Objective evidence observed: (where relevant please add photo numbers) |  |
|   |  |  |
| Observation: None   |  |  |
| Description of observation:  Local law or ETI requirement:  | Objective evidence observed:   |  |
| Comments:   |  |  |
|   |  |  |
| Good Examples observed: None  |  |  |
| Description of Good Example (GE):   | Objective Evidence<br>Observed:  |  |



| Working hours' analysis  Please include time e.g. hour/week/month  (Go back to Key information)                  |   |   |  |  |
|--|---|---|--|--|
| Systems & Processes  |   |   |  |  |
| A. What timekeeping systems are used: timecard etc.  | Describe: Thumb   | Scan system   |  |  |
| B: Is sample size same as in wages section?  | Yes No B1: If no, please give details Not Applicable                                    |   |  |  |
| C: Are standard/contracted working hours defined in all contracts/employment agreements?                         | ⊠ Yes<br>□ No   | C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not Applicable |  |  |
| D: Are there any other types of  | ☐ Yes<br>⊠ No   | D1: If YES, please complete as appropriate:   |  |  |
| contracts/employment agreements used?  |   | □ 0 hrs □ Part time □ Variable hrs □ Other  |  |  |
|  |   | If "Other", Please define:  |  |  |
|  |   | Not Applicable  |  |  |
| E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? | ☐ Yes<br>☑ No   | E1: If <b>yes</b> , please detail hours, %, types of workers affected and frequency Please give details: Not Applicable   |  |  |
| F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?                    | F2: Please select all applicable:  1 in 7 days 2 in 14 days No If 'No', please explain: | F3: Is this allowed by local law?  Yes  No  |  |  |
|  | Maximum number of days worked without a day off (in sample):                            |   |  |  |
|  | 6 days  |   |  |  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01



| Standard/Contracted Hours worked  |  |   |  |
|---|--|---|--|
| G: Were standard  | ☐ Yes<br>⊠ No  | G1: If yes, % of workers & frequency:   |  |
| working hours over 48 hours per week found?   | INO INO  | Not Applicable  |  |
| H: Any local<br>waivers/local law or  | ☐ Yes<br>⊠ No  | H1: If yes, please give details:  |  |
| permissions which allow<br>averaging/annualised<br>hours for this site?   | M NO   | Not Applicable  |  |
| Overtime Hours worked   |  |   |  |
| I: Actual overtime hours<br>worked in sample (State<br>per day/week/month)  | August 2022: 0<br>July 2022: 0<br>June 2022: 0           |   |  |
| J: Combined hours<br>(standard or contracted<br>+ overtime hours = total)<br>over 60 found?<br>Please give details: | ☐ Yes<br>☑ No  |   |  |
| K: Approximate percentage of total workers on highest overtime hours:   | August 2022: 0<br>July 2022:0<br>June 2022: 0            |   |  |
| L: Is overtime voluntary?   |  | L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:   |  |
|   | inomanon   | Although there was no overtime working in the factory. But based on factory policy, Overtime is voluntary.  |  |
| Overtime Premiums   |  |   |  |
| M: Are the correct legal overtime premiums paid?  | Yes No N/A – there is no legal requirement to OT premium | M1: Please give details of normal day overtime premium as a % of standard wages:  Although no overtime working was found in the factory, but factory has policy to pay overtime at 200% of normal wage per hour |  |
| N: Is overtime paid at a premium?   | ∑ Yes<br>☐ No  | N1: If yes, please describe % of workers & frequency: Facility is paying overtime at premium rate which double 200% for regular day overtime hours.   |  |



| O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant. | □ No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other:  NA- Factory pays overtime at premium rate which is double (200%) for normal days overtime hours. |
|--|--|
|  | Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other  |
|  | No worker was found working in overtime hours.   |
| P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please  | 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)                                 |
| complete the boxes where relevant.   | P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:   |
|  | Overtime is voluntary. No worker was found working in overtime hours.  |
| 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 Q1: If yes, please give details: Not Applicable   |
| 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<br>□ No  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

rence: PAK-3913-01 Date: 20/09/2022



#### 7: No Discrimination is Practiced

(Click here to return to summary of findings)

#### 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:**

- Based on the employees' interview, none of the selected employees feel discriminated or experienced any discrimination practices since they are employed. They are treated equally.
- Based from the management discussion and policy review, facility believes in equal opportunity for all based on merit and ability to carry out given responsibilities.
- Based on the employees' interview and policy review, the facility does not discriminate in work practices based on gender, age, disability, race, cultural or religion beliefs, political affiliation, sexual orientation, or other personal characteristics.
- Based on the document review of payroll records, employees with the same job are paid the same irrespective of gender, age, or other issues.
- Based from the employees' interview, employees are given reasonable time off to pray.

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

#### Details:

Policy on Prohibition of Discrimination and procedure.

Any other comments: None

| A: Gender breakdown of Management<br>+ Supervisors (Include as one combined<br>group)  | Male: 100 %<br>Female: 0%  |
|--|--|
| B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:   | None   |
| 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 No evidence of discrimination |



| Professional Development   |   |                                 |  |
|--|---|---------------------------------|--|
| A: What type of training and development are available for workers?  | Training on social issues provided to al monthly basis. | ll employees on six             |  |
|  |   |                                 |  |
| B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?   |   |                                 |  |
|  | If no, please give details:                             |                                 |  |
|  | 1   |                                 |  |
|  | N   |                                 |  |
|  | Non–compliance: None                                    |                                 |  |
| 1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer  N |   |                                 |  |
|  |   |                                 |  |
| Observation: None  |   |                                 |  |
| Description of observation:  |   | Objective evidence observed:    |  |
| Local law or ETI requirement:  |   | observed.                       |  |
| Comments:  |   |                                 |  |
|  |   |                                 |  |
| Good Examples observed: None   |   |                                 |  |
| Description of Good Example (GE):  |   | Objective Evidence<br>Observed: |  |

#### 8: Regular Employment Is Provided

(Click here to return to summary of findings) (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:**

- All employees' files are maintained for individual employee with complete contact letters.
- The employee wages are in alignment with the local law.
- Copy of appointment letter provided to all the employees as confirmed by selected sampled employees during the interview.

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

Date: 20/09/2022

#### Details:

- Appointment Letters
- Personnel Files

Any other comments:

Nil



| Non–compliance: None   |  |  |  |
|--|--|--|--|
| Description of non-compliance:     NC against ETI  | ainst Local Law 🔲 NC against customer                          | Objective evidence observed: (where relevant please add photo numbers) |  |
|  | Observation: None  |  |  |
|  | Observation, Notice  |  |  |
| Description of observation:  |  | Objective evidence observed:   |  |
| Local law or ETI requirement:  |  | observed.  |  |
| Comments:  |  |  |  |
|  |  |  |  |
|  | Good Examples observed: None                                   |  |  |
| Description of Good Example (GE)   | ;  | Objective Evidence<br>Observed:  |  |
| 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?    X   Terms & Conditions presented   X   Understood by workers   X   Same as actual conditions   X   If any are unchecked, please describe finding and specific category(ies) of workers affected: |  | ng and specific  |  |
| 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 caffected: | ategory(ies) of workers  |  |



| 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 workplace 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 – please give details |                  |
|---|--|------------------|
|   |  |                  |
| 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:  | No migrant employee  | in the facility. |
| B: Migrant worker recruitment   | Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used Not Applicable  |                  |
| C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?  |  | 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 exc   | imple of roles:  |



# **NON-EMPLOYEE WORKERS**

| Recruitment Fees:                    |          |  |  |
|--------------------------------------|----------|--|--|
|                                      |          |  |  |
| A: Are there any fees?               | ☐ Yes    |  |  |
|                                      | ⊠ No     |  |  |
| B: If yes, check all that            | □ Reci   | ruitment / hiring fees   |  |
| apply:                               | _        | ice fees   |  |
| арріу.                               | _        | lication costs   |  |
|                                      |          | ommendation fees   |  |
|                                      | =        | ement fees   |  |
|                                      | =        |  |  |
|                                      |          | ninistrative, overhead or processing fees<br>tests                         |  |
|                                      | =        |  |  |
|                                      | =        | ifications   |  |
|                                      |          | dical screenings   |  |
|                                      |          | ports/ID's   |  |
|                                      |          | k / resident permits   |  |
|                                      |          | certificates   |  |
|                                      | =        | ce clearance fees  |  |
|                                      | _        | transportation and lodging costs after employment offer                    |  |
|                                      |          | transport costs between workplace and home                                 |  |
|                                      |          | relocation costs after commencement of employment                          |  |
|                                      | _        | hire training / orientation fees   |  |
|                                      | =        | dical exam fees  |  |
|                                      | :        | osit bonds or other deposits   |  |
|                                      |          | other non-monetary assets  |  |
|                                      |          | er – please give details   |  |
| ,                                    | NA       |  |  |
| details:                             |          |  |  |
|                                      |          |  |  |
|                                      |          |  |  |
|                                      |          | Agency Workers (if applicable)   |  |
|                                      |          | 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.)           |  |
| A. N. wala an af a a a a a a a a a a |          |  |  |
| A: Number of agencies used           |          | Nigora de Maria Nalah Aras Parah Ia  |  |
| (average):                           |          | Names if available: Not Applicable   |  |
|                                      |          |  |  |
| B: Were agency workers' age          | e /      | Yes  |  |
| pay / hours included within th       | ne       | │ □ No   |  |
| scope of this audit?                 |          |  |  |
|                                      |          | Not Applicable   |  |
|                                      |          |  |  |
| C: Were sufficient documents         |          | <u>□</u> Yes   |  |
| agency workers available for         |          | ∐ No   |  |
| review?                              |          |  |  |
| Not Applicable                       |          |  |  |
| Delathan alamata                     |          |  |  |
| D: Is there a legal contract /       | 2        | ∐ Yes  |  |
| agreement with all agencies?         |          |  |  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01 Date: 20/09/2022 Sedexglobal.com 51

Please give details:

Not Applicable



| E: Does the site have a system for checking labour standards of agencies? If yes, please give details. | Yes No Please give details:  |
|--|--|
|  |  |
|  | Contractors: erally individuals who supply several workers to a site. Usually the contractors e workers are paid by the contractor. Common terms include, gang bosses, labor provider, |
| A: Any contractors on site?  | Yes No If yes, how many contractors are present, please give details:  |
| B: If <b>Yes</b> , how many workers supplied by contractors?   | N/A  |
| C: Do all contractor workers understand their terms of employment?                                     | Yes No Please describe finding: N/A  |
| D: If <b>Yes</b> , please give evidence for contractor workers being paid per la                       | w: N/A   |

Date: 20/09/2022

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01

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#### 8A: Sub-Contracting and Homeworking

(Click here to return to summary of findings) (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:**

A site tour showed, facility subcontract dyeing

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

Documents related to employees and sub-contracting

Policy on sub-contracting

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

| Process<br>Subcontracted | Dyeing and Washing  | None | None | None |
|--------------------------|---|------|------|------|
| Name of factory          | Premium Textile Mills<br>Ltd (Dye House)  | None | None | None |
| Address                  | Plot No: 60-61 & 76-<br>77, Main Super<br>Highway M9,<br>Nooriabad-District<br>Shamshoro-Sindh-<br>Pakistan | None | None | None |

Details: None

Non-compliance: None



| 1. Description of non-compliance:  NC against ETI/Additional Eleme  NC against customer code:  Local law and/or ETI /Additional Ele                                 | ·  | Objective evidence observed: (where relevant please add photo numbers) |
|---|--|--|
| Recommended corrective action:  |  |  |
|   | Observation: None  |  |
| Description of observation:  Local law or ETI/Additional elements requirement:  Comments:   |  | Objective evidence observed:   |
|   | Good Examples observed: None   |  |
| Description of Good Example (GE):   |  | Objective Evidence<br>Observed:  |
| Summary of sub-contracting – if applicable  Not Applicable please x   |  |  |
| A: Has the auditor made a simple calculation to compare capacity with workers' workload in order to identify possible unrecorded work or undeclared sub-contracting | Yes No A1: Please describe: Auditor made simple cocapacity with workers, workload. | alculation to compare  |
| B: If sub–contractors are used, is there evidence this has been agreed with the main client?  | Yes No B1: If <b>Yes</b> , summarise details:                                      |  |
| C: Number of sub-<br>contractors/agents used:   | 01   |  |
| D: Is there a site policy on sub-<br>contracting?   | ∑ Yes     ☐ No     D1: If <b>Yes</b> , summarise details:                          |  |
| E: What checks are in place to ensure no child labour is being used and work is safe?   | Factory conduct audits of its sub-contractor conditions and child labour.          | s to check workplace   |



| 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 A1: If <b>Yes</b> , summarise d | etails:    |                         |                       |
| B: Number of homeworkers  | B1: Male:                              | B2: Female | <b>:</b> :              | Total:                |
| C: Are homeworkers employed direct or through agents?   | ☐ Directly ☐ Through Agents            |            | C1: If throu<br>agents: | ugh agents, number of |
|   |  |            |                         |                       |
| D: Is there a site policy on homeworking?   | Yes No                                 |            |                         |                       |
| E: How does the site ensure worker hours and pay meet local laws for homeworkers?             |  |            |                         |                       |
| F: What processes are carried out by homeworkers?   |  |            |                         |                       |
| G: Do any contracts exist for homeworkers?  | Yes No                                 |            |                         |                       |
|   | G1: Please give details                | :          |                         |                       |
| H: Are full records of homeworkers available at the site?                                     | Yes No                                 |            |                         |                       |
| H: Are full records of homeworkers available at the site?                                     | Yes No                                 |            |                         |                       |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01



# 9: No Harsh or Inhumane Treatment is Allowed (Click here to return to summary of findings)

#### 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 <sup>rd</sup> party?                          | <ul><li> ☐ Yes</li><li>☐ No</li><li>Please give details: Suggestion/Complaint Box</li></ul>            |
|--|--|
| B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.   | Yes, workers are aware where complaint box is provided.  |
| C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.   | Suggestion/Complaint Box   |
| D: Which of the following groups is there a grievance mechanism in place for?  | ₩Orkers     Communities     Suppliers     Other  |
|  | Please give Details: Suggestion/Complaint Box are provided for all employees in different departments. |
| E: Are there any open disputes?  | ☐ Yes ☐ No  If yes, please give details  |
| F: Does the site encourage its business partners (e.g., suppliers) to 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  |
| G: Is there a published and transparent disciplinary procedure?  | ☐ Yes ☐ No If no, please explain   |
| H: If yes, are workers aware of these the disciplinary procedure?  | ∑ Yes     ☐ No     If no, please give details  |



|  | Yes                         |
|--|-----------------------------|
| I: Does the disciplinary procedure allow | ⊠ No                        |
| for deductions from wages (fines) for    | If yes, please give details |
| disciplinary purposes (see wages         |                             |
| section)?                                |                             |

#### **Current Systems and Evidence Examined**

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

### **Current systems:**

- The facility has established anti-harsh or inhumane treatment policy and procedure.
- The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- Through the facility management and employees' interview, it is noted that no physical abuse or discipline happened in the facility.
- The disciplinary procedure of the facility is verbal warning, written warning, and disciplinary action according to law.
- Factory has established Disciplinary Action Procedure
- Factory has established Grievance Handling Procedure

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

### Details:

- Policy on No Harsh or Inhumane Treatment in social compliance manual.
- Disciplinary Action Procedure
- Grievance Handling Procedure

Any other comments:

Nil

| Non–compliance: None   |  |  |
|--|--|--|
| 1. Description of non–compliance:  NC against ETI NC against Local Law NC against customer code:  Local law and/or ETI requirement: Recommended corrective action: | Objective evidence observed: (where relevant please add photo numbers) |  |
| Observation: None  |  |  |
| Description of observation:  | Objective evidence   |  |
| Local law or ETI requirement:  | observed:  |  |
| Comments:  |  |  |



|                                   | Good Examples observed: None |                                 |
|-----------------------------------|------------------------------|---------------------------------|
| Description of Good Example (GE): |                              | Objective Evidence<br>Observed: |



#### 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:**

Facility employs local employees and there is no employee requiring work permit. Security and janitorial staff are directly hired by the facility.

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

#### Details:

- Personal files
- **Employment Contracts**

Any other comments: None

| Non-compliance: None  |  |  |
|---|--|--|
| 1. Description of non-compliance:  NC against ETI/Additional Elements NC against customer code:  Local law and/or ETI /Additional Elements requirement: | Objective evidence observed: (where relevant please add photo numbers) |  |
| Recommended corrective action:  |  |  |
|   |  |  |
| Observation: None   |  |  |
| Description of observation:  Local law or ETI/Additional Elements requirement:  Comments:   | Objective evidence observed:   |  |
|   |  |  |
| Good examples observed: None  |  |  |
| escription of Good Example (GE):  | Objective Evidence<br>Observed:  |  |



#### 10. Other issue areas 10B4: Environment 4-Pillar

(Click here to return to summary of findings)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

# **B.4. Compliance Requirements**

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.

#### **B4.** Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

#### **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:**

- Facility has defined environmental policy (PTM/EMS/01/01) and EMS manual EMS/03/01. Facility
  has maintained all documents related Environmental Management System verified during
  documents review moreover facility has also appointed Mr. Abadat Ali- Deputy Manager
  Compliance to address environmental issues.
- Facility has environmental impact assessment report (Ref # RA/01/02) in which all impacts were discussed in detail.
- During review of documents and interviews with concerns persons it was noted that facility was aware of the significant environmental impacts of their site and its processes. Internal environmental risk assessment report was reviewed which was made on 01/07/2022 in which operational activities, environmental aspects, potential environmental impacts, severity level, potential causes of failure and current control /preventive measures were analyzed.
- Facility has defined objective and targets to reduce waste, energy usage, Greenhouse gases and water usage. Facility has object and target to

Date: 20/09/2022

• Reduce waste 5% in 2022.



- Reduce water use 5& in 2022
- Reduce GHG emission &% 2022
- Facility has signed waste contract with "Global Environmental Lab (Pvt) Ltd" dated 01/07/2022
- Facility has (Ref # 23167/PTML/2022/FAC-003 dated 24/06/2022 from Evergreen Environmental Laboratory.
- Facility has Ambient Air monitoring reports (Ref # 23167/PTML/2022/FAC-003 dated 24/06/2022 from Evergreen Environmental Laboratory
- The facility has obtained Environmental NOC (Ref #. EPA/ROH/EMP/25/2022 dated 09/06/2022 from Environmental Protection Department Government of the Punjab –Lahore.

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

- Environmental policy and management system procedures and Appointment of EMR
- Environmental impact assessment record.
- Environmental objective and targets to reduce impacts on business.
- Waste management policy and procedure
- Water consumption policy and procedure
- Pollution control procedure
- Energy usage records
- Lux level monitoring test report
- Emission test report
- Noise level monitoring test report
- Particulate / Dust Estimation report
- Environmental NOC
- Hazardous Substance purchasing permit

Any other comments: None

Details:

| Non–compliance: None  |  |  |
|---|--|--|
| 1. Description of non–compliance:  NC against ETI/Additional Elements  NC against customer code:  Local law and/or ETI/Additional Elements requirement:  Recommended corrective action: | Objective evidence observed: (where relevant please add photo numbers) |  |
|   |  |  |
| Observation: None   |  |  |
| Description of observation:   | Objective evidence   |  |
| Local law or ETI/Additional elements requirements: Comments:  | observed:  |  |
|   |  |  |
| Good examples observed: None  |  |  |
| Description of Good Example (GE):   | Objective Evidence<br>Observed:  |  |



| Environmental Analysis (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)   |   |  |  |
|--|---|--|--|
| A: Is there a manager responsible for Environmental issues (Name and Position):  | Mr. Umer Ali- Manager Compliance is responsible for environmental issues.   |  |  |
| B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?  | Yes No B1: Please give details: Facility has maintained all Environmental Management System related documents verified during documents review. Moreover, facility has also appointed Mr. Umer Ali- Manager Compliance to address environmental issues. |  |  |
| C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.  | Yes No C1: Please give details: Facility has no certification on ISO 14001:2015 however facility has maintained all Environmental Management System related documents verified during documents review.   |  |  |
| D: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)   | Yes No D1: If yes, is it publicly available? Facility has documented environmental policy and publicly available.   |  |  |
| E: If yes, does it address the key impacts from their operations and their commitment to improvement?  | Yes No E1: Please give details: Factory has defined environmental objectives to minimize impacts from their operatios.  |  |  |
| F: Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)   | ∑ Yes □ No  |  |  |
| G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details.  (For guidance, please see Measurement criteria) | ☐ Yes ☑ No<br>G1: Please give details:  |  |  |
| H: Have all legally required permits been shown? Please gives details.   | Yes No H1: Please give details: The facility has obtained Environmental NOC (Ref #. EPA/ROH/EMP/25/2022 dated 09/06/2022 dated 03/05/2021 from Environmental Protection Department Government of the Punjab –Lahore                                     |  |  |
| I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?   | Yes No N/A  I1: Please give details: Facility has maintained proper documentation to record hazardous chemicals used in the factory verified during documents review.   |  |  |



| J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?   | ☐ Yes ☐ No<br>J1: Please give details: <b>NA</b>   |  |  |  |
|---|--|--|--|--|
| K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:   | Yes No K1: Please give details: Facility has defined objective and targets to reduce waste, energy usage, Greenhouse gases and water usage. Facility has object and target to Reduce waste 5% in 2022. Reduce Water use 5& in 2022 Reduce GHG emission &% 2022 |  |  |  |
| L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.   | ☐ Yes ☒ No<br>L1: Please give details:   |  |  |  |
| M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?   | Yes No M1: Please give details: Facility has system in place to calculate and measure key utilities of water, energy and natural resources.  |  |  |  |
| N: Has the facility checked that any Sub-<br>Contracting agencies or business partners<br>operating on the premises have the appropriate<br>permits and licences and are conducting business<br>in line with environmental expectations of the<br>facility? | Yes No N1: Please give details:  NA- because facility does not subcontract any process.  |  |  |  |
| Usage/Discharge analysis  |  |  |  |  |
| Criteria  | Previous year: Please<br>state period: N/A   | Current Year: Please<br>state period: 2022 |  |  |
| Electricity Usage:<br>Kw/hrs  | N/A  | 1,220,056 KWH                              |  |  |
| Renewable Energy Usage:<br>Kw/hrs   | N/A  | 25,455 KWH                                 |  |  |
| Gas Usage:<br>Kw/hrs  | N/A  | 20 kg/24Hrs. (LPG for canteen)             |  |  |
| Has site completed any carbon Footprint Analysis?   | ☐ Yes ☐ No   | ☐ Yes ⊠ No                                 |  |  |
| If <b>Yes</b> , please state result   | N/A  | NA   |  |  |
| Water Sources: Please list all sources e.g. lake, river, and local water authority.   | N/A  | Ground Water                               |  |  |
| Water Volume Used:<br>(m³)  | N/A  | 106 m <sup>3</sup> /24Hr                   |  |  |

Audit company: Intertek Pakistan (Pvt) Ltd Report reference: PAK-3913-01



| Water Discharged: Please list all receiving waters/recipients. | N/A | <ul><li>Kitchen.</li><li>Toilets</li></ul> |
|--|-----|--|
| Water Volume Discharged:<br>(m³)                               | N/A |  |
| Water Volume Recycled:<br>(m³)                                 | N/A | None                                       |
| Total waste Produced (please state units)                      | N/A | 25K Kg APRX (PER<br>ANNUM)                 |
| Total hazardous waste Produced: (please state units)           | N/A | 30 Kg                                      |
| Waste to Recycling: (please state units)                       | N/A | None                                       |
| Waste to Landfill:<br>(please state units)                     | N/A | None                                       |
| Waste to other:<br>(please give details and state units)       | N/A | None                                       |
| Total Product Produced (please state units)                    | N/A | 264,000 Pcs/month                          |



#### 10C: Business Ethics – 4-Pillar Audit

(Click here to return to summary of findings)

To be completed for a 4-Pillar SMETA Audit

#### 10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

#### 10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

#### **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:**

- Facility has defined anti-fraud and bribery policy. As per policy facility is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices.
- Facility has zero tolerance towards such behaviors of bribery or corruption.

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

Date: 20/09/2022

Details:

Facility anti-bribery policy

Any other comments: None



| Non-compliance: None   |   |  |  |  |
|--|---|--|--|--|
| 1. Description of non–compliance:  NC against ETI/Additional Elements  NC against customer code:   | NC against Local  | Objective evidence observed: (where relevant please add photo numbers) |  |  |
| Local law and/or ETI/Additional Elements requirement:  |   | ada priore nombersy  |  |  |
| Recommended corrective action:   |   |  |  |  |
| Observation: None  |   |  |  |  |
| Description of observation:  |   | Objective evidence   |  |  |
| Local law or ETI/Additional elements requirement:  |   | observed:  |  |  |
| Comments:  |   |  |  |  |
|  |   |  |  |  |
| Good examples observed: None   |   |  |  |  |
| Description of Good Example (GE):  |   | Objective Evidence<br>Observed:  |  |  |
|  |   |  |  |  |
| A: Does the facility have a Business Ethics<br>Policy and is the policy communicated and<br>applied internally, externally or both, as<br>appropriate? | ☐ Internal Policy☐ Policy for third parties including suppliers: A1: Please give details: Facility has written policy on the need to avoid bribes and fraudulent practices which is communicated and applied internally and externally. |  |  |  |
| B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?   | <ul> <li>         ∑ Yes</li> <li>         No</li> <li>         B1: Please give details: Facility provide awareness session to all relevant workers on quarterly basis (Last session was conducted on 29/07/2022.     </li> </ul>        |  |  |  |
| C: Is the policy updated on a regular (as needed) basis?   | <ul><li></li></ul>  |  |  |  |
| D: Does the site require third parties including suppliers to complete their own business ethics training  | Yes No D1: Please give details: Facility require to complete their  |  |  |  |
|  | TUT. FIEUSE GIVE GETAILS, FACILITY FEC  |  |  |  |



Other findings

# Other Findings Outside the Scope of the Code

None

# **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)

None



# **Photo Form**





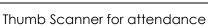


Factory Name

**Factory Entrance** 

Facility Building





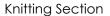


Complaint Box



Yarn Store







Finishing & Packing



Aisles marking



Waste Containers.



**Emergency Exit** 



Electrical Safety









Safety Signs

Fire Buckets

**Evacuation Map** 







**Smoke Alarms** 

Smoke & Fire Alarm Control Panel

Fire Alarm







Fire Extinguishers

Fire Safety Point

First Aid Box







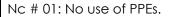
Drinking Water Point

Toilets

Toilets Identification









NC # 02: Knitting machines safety glasses not installed

Date: 20/09/2022

N/A

None



For more information visit: 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:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d

# Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d

# **Click here for Auditors:**

https://www.surveymonkey.co.uk/r/BRTVCKP