



SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents
2-Pillar SMETA Audit
 - ETI Base Code
 - SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,**4-Pillar SMETA**
 - 2-Pillar requirements plus
 - Additional Pillar assessment of Environment
 - Additional Pillar assessment of Business Ethics
 - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC411585059	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS412015295	
Business name (Company name):	Deshone Apparels Limited			
Site name:	Deshone Apparels Ltd			
Site address:	TH Bhaban, 71 Borobagh, Mirpur-02, Dhaka, 1216 BD	Country:	BD	
Site contact and job title:	Md. Habibul Haque / HR & Compliance officer			
Site phone:	+88- 01678-828017	Site e-mail:	habibdeshoneapl@gmail.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-03-23			

Audit Company Name:
GSCS International Ltd

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

Audit Parameters		
Time in and time out	Day 1	
	In	09:00
	Out	16:30
Audit type:	PERIODIC	
Was the audit announced?	SEMI_ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Md. Habibul Haque / HR & Compliance officer	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	Senior management & worker representative (Selected PC Member) were present on the opening and closing meeting. Noted that union is not mandatory as per law.		
<i>Reason for absence during the audit</i>	Senior management & worker representative (Selected PC Member) were present on the opening and closing meeting. Noted that union is not mandatory as per law.		
<i>Reason for absence at the closing meeting</i>	Senior management & worker representative (Selected PC Member) were present on the opening and closing meeting. Noted that union is not mandatory as per law.		

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>2 - Freedom of association and right to collective bargaining are respected</u>	2.1	§1	1	0	0	NC - ZAF600395287
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.2 3.5	§10 §11 §12 §13 §14 §2 §3 §4 §5 §6 §7 §8 §9	13	0	0	NC - ZAF600395288 NC - ZAF600395289 NC - ZAF600395290 NC - ZAF600395291 NC - ZAF600395292 NC - ZAF600395293 NC - ZAF600395294 NC - ZAF600395295 NC - ZAF600395296 NC - ZAF600395298 NC - ZAF600412080 NC - ZAF600412081 NC - ZAF600412084
<u>0B - Management systems and code implementation</u>	0.B.1		0	1	1	Obs - ZAF600395297 GE - ZAF600412083
<u>4 - Child labour shall not be used</u>	4.2	§15	1	0	0	NC - ZAF600395299
<u>5 - Living wages are paid</u>			0	0	1	GE - ZAF600412082

Local Law Issues

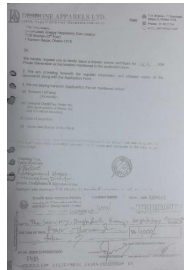
Issue	Description
§1	Bangladesh Labour Law, 2006, Chapter-13, Section-205, (1) the employer of every establishment in which fifty or more workers are employed shall, in the manner prescribed by rules, constitute a Participation Committee in his establishment with the direct involvement of the workers. (6) In an establishment where there is no trade union, representative of the workers in the Participation Committee of such establishment shall be elected in the manner prescribed by rules from amongst the workers engaged in the establishment.
§2	Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1): No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: (a) Power generation; (b) Energy transmission; (c) Energy distribution and marketing; (d) Energy supply; and (e) Energy storage.
§3	Bangladesh Labor Law- 2006 Section-93, (1) In every establishment wherein more than fifty workers are ordinarily employed, adequate and suitable shelters or rest rooms, and a suitable lunch room with provision for drinking water where workers can eat meals brought by them, shall be provided and maintained for the use of the workers.
§4	In accordance with The Bangladesh Labour Rules, 2015, Rule 77 (5): The medical room shall be used for primary aid and the comforts of patients. It must have at least following furniture and equipment's: d) 2 stretchers; d) 1 wheel chair; e) 2 buckets or pots with closely-fitted lids; a) 1 coated pot of hot and cold water; f) 1 kettle for boiling water; j) 6 woollen blankets; m) 6 hand towels; p) 2 glass pots; t) 1 bottle of 1:20 carbolic lotion; v) 1 curtain; y) Tetanus serum

§5	Bangladesh Labour Act, 2006, Amended on 2013, Chapter-6, Section-62 (8): In factories and establishments wherein 50 (fifty) or more workers/ employees are employed, at least once in every 2 [6 (six) months] a mock fire-fighting shall be arranged and a book of records in this regards shall be maintained in the prescribed manner by the employer. Bangladesh Labour Rules 2015, Chapter-6, Section-55, (14): 14) As per Section 62(8), fire drills and emergency evacuation drills have to be arranged at least once in every six month period and the same has to be preserved in respective record books, in accordance with Form- 22. In addition, the concerned Inspector and nearby Fire Service Station have to be informed minimum 15 days before the drills are held.
§6	In accordance with Bangladesh Labour Rules, 2015, Rule 67 (2 & 3): 2) In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. 3) No worker can be employed in the relevant works without ensuring safety and health protection measures and the training related therewith. In addition, personal safety equipment must be preserved in accordance with Information Form-23.
§7	Bangladesh Labor Act 2006, Chapter- 6, Section – 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.
§8	In accordance with Bangladesh Labor Rules 2015, section 55(12), Amendment 2022: 12) A trained officer shall be recruited in the factory/institute where at least 300 workers are employed. The duties of the officer shall be ensuring the preservation and maintenance of all fire-fighting equipments and keeping them fit and arranging trainings for the three teams mentioned in Sub-section 10 after every six-month period.
§9	In accordance with The Bangladesh Labour Act, 2006, Section 63 (1- d, 3): 1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced- (iii) every dangerous part of any machinery:
§10	"In accordance with The Bangladesh Labour Rules 2015, Rule 55 (10): (10) If possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable fire-repellant instruments. And the security has to be ensured by dividing the trained workers into fire-fighting team, rescue team and first aid team (6% members in each team) and the records related herewith have to be preserved in accordance with Form- 22. "
§11	"Bangladesh Labour Act (Amendment) 2013, Section- 90 (a): In every factory where 50 (fifty) or more workers are employed, there shall be a safety committee to be formed and functioned in the manner prescribed by rules. In accordance with The Bangladesh Labour Rules 2015, Rule 81 (1 & 8): 1) As per Section 90 (a), the Owners of the institute where 50 or more workers are employed or were employed in a certain period of time in the year shall form Safety Committee. However, Safety Committee must be formed within 6 (six) months of the application of this Code in the present factories/institutes or within 9 (nine) months of the application of this Code in the newly established factories/institutes. In addition, as per Section 183 if the institutes of a business group remain scattered in more than one sub-district/upazila or if the Owners work region-wise, then upazila/sub-district wise Safety Committee must be formed. 8) The Representative for joint bargaining shall nominate Workers' Representative from the workers working in each section, department, floor, storehouse and unit separately. Then, the nominated/elected Representative shall be included in the Safety Committee."

§12	<p>BNBC Part 4, Chapter 3, Clause No. 3.7.5: 3.7.5 Protective opening leads to an exit shall be fire doors or fire windows or a fire assembly having a fire resistance rating of at least 20 minutes or more as per provisions of this Code. (a) Certified Fire resistance rating of Doors shall be in accordance with ASTM E152 without the hose stream test. (b) Fire resistance rating of the fire door assembly has to perform as required 20, 30, 60, 90, 180 minutes or more shall be leveled A, B, C, D, E and F respectively. (c) Fire door assembly of any approved materials shall qualify through ASTM E152 without the hose stream test.</p>
§13	<p>In accordance with building construction Act 1952, Section 3 (a): [3A. Restriction on improper use of lands and buildings.- (I) No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction. In Accordance with BNBC, Chapter-2, Section-2.1.7 (G), Buildings under this Occupancy group shall include any building or portion thereof in which materials are fabricated, assembled, or processed by physical, chemical, pharmaceutical, nuclear, mechanical and other processes, in order to alter their characteristics or to produce or manufacture new materials. Such buildings may also house incidental storage and handling of the raw and the finished materials or goods. Examples of such buildings are various mills, factories and plants, automatic laundries, power plants, pumping stations, smoke houses, saw mills, foundries and machine shops, pharmaceutical, nuclear and irradiation plants.</p>
§14	<p>Bangladesh Labour Law 2006, Section 78 (1 & 2): 78. Explosive or inflammable dust, gas, etc. : (1) where in any establishment any manufacturing process produces dust, gas, fume or vapour of such character and to such extent as to be likely to explode on ignition, all practicable measures shall be taken to prevent any such explosion by- (a) effective enclosure of the plant or machinery used in the process; (b) removal or prevention of the accumulation of such dust, gas, fume or vapour; (c) Exclusion or effective enclosure of all possible sources of ignition. (2) Where in any establishment the plant or machinery used in a process is not so constructed as to withstand the probable pressure which such an explosion as aforesaid would produce, all practicable measure shall be taken to restrict the spread and effects of the explosion by the provision in the plant or machinery of chokes,</p>
§15	<p>"Bangladesh Labour Act 2006, Chapter-8, Section-94 (2): Such rooms shall provide adequate accommodation, adequately lighted and ventilated and maintained in a clean and sanitary condition and shall be under the charge of woman trained or experienced in the care of children and infants. Bangladesh Labor Rules 2015, Chapter-8, Section-94: 1) The layout, quality and position of the Children's Room or the separate Children Building or the adapted building must be approved by the Inspector General or the Inspector authorized by him/her. 2) A separate and screen covered area must be kept preserved for the breastfeeding mothers so that they can lactate their babies maintaining secrecy and modesty. 3) The floor of the Children's Room and the internal walls thereof with a height of 1.22 meters must be made smooth and impervious. 4) 0.25 liters of milk for each child and nutritious foods must be supplied for the children staying in Children's Room. Bangladesh Gazette, Extra, September 15, 2015 7375 5) Neat and clean clothes must be provided for the employees working in Children's Room. 6) Females must be prioritized while recruiting employees for the Children's Room."</p>

Corrective Action Plan - Non Compliances


Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600395287	
Clause	2 - Freedom of association and right to collective bargaining are respected	
Issue Title	129 - Worker / union representatives are not freely elected (e.g. they are assigned by management)	
Subcategory	Worker dialogue	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labour Law, 2006, Chapter-13, Section-205, (1) the employer of every establishment in which fifty or more workers are employed shall, in the manner prescribed by rules, constitute a Participation Committee in his establishment with the direct involvement of the workers. (6) In an establishment where there is no trade union, representative of the workers in the Participation Committee of such establishment shall be elected in the manner prescribed by rules from amongst the workers engaged in the establishment.	
ETI code	2.1 - Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.	
Explanation to the non compliance	It was noted through documents review and workers & management interview that the participation committee of the facility was formed by selection process instead of election. Facility confirmed that the election process will start as soon as possible.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input checked="" type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the participation committee should be formed through election process by the facility.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600395288	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Energy Regulatory Commission Act, 2003, Section 27 (1): No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as: (a) Power generation; (b) Energy transmission; (c) Energy distribution and marketing; (d) Energy supply; and (e) Energy storage.	
ETI code	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.	
Explanation to the non compliance	It was noted through documents review and management interview that the facility had one diesel generator with capacity of 165 kw had no operation license from the respective authority. However, the facility already applied to the concern authority but they did not get any feedback yet.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input checked="" type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management shall obtain generator license from the concerned	
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	authority as soon as possible.	
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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395289	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	335 - No canteen facility provided as per local law	
Subcategory	Hygiene Facilities & Housekeeping	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labor Law- 2006 Section-93, (1) In every establishment wherein more than fifty workers are ordinarily employed, adequate and suitable shelters or rest rooms, and a suitable lunch room with provision for drinking water where workers can eat meals brought by them, shall be provided and maintained for the use of the workers.	
ETI code	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.	
Explanation to the non compliance	It was noted that floor visit and management interview that the factory workers have not been provided any dining and canteen facilities. Note that the facility management stated that the facility had started working to provide dining and canteen to the worker.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input checked="" type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility shall establish dining	


	and canteen facility for the workers as per law.	
Additional comments	Facility has provided dining and canteen facility for the workers. Facility has established dining and canteen facility for the workers as per law.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395290	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	314 - Medical facilities do not meet legal requirements	
Subcategory	Worker Health	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with The Bangladesh Labour Rules, 2015, Rule 77 (5): The medical room shall be used for primary aid and the comforts of patients. It must have at least following furniture and equipment's: d) 2 stretchers; d) 1 wheel chair; e) 2 buckets or pots with closely-fitted lids; a) 1 coated pot of hot and cold water; f) 1 kettle for boiling water; j) 6 woollen blankets; m) 6 hand towels; p) 2 glass pots; t) 1 bottle of 1:20 carbolic lotion; v) 1curtain; y) Tetanus serum	
ETI code	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.	
Explanation to the non compliance	It was noted during facility visit that in the medical room, below elements were found missing: a. 2 stretchers; b. 1-wheel chair; c. 2 buckets or pots with closely-fitted lids; d. 1 coated pot of hot and cold water; e. 1 kettle for boiling water; f. 6 woollen blankets; g. 6 hand towels; h. 2 glass pots; i. 1 bottle of 1:20 carbolic lotion; j. 1 curtain; and k. Tetanus serum.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	
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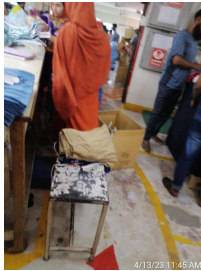

Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should have sufficient medical equipment in the medical room.	
Additional comments	Facility already have taken initiative to close this nc. and this will be continue. Accepted as corrective action is accurate.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395291	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	217 - Regular fire drills are not conducted	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	<p>Bangladesh Labour Act, 2006, Amended on 2013, Chapter-6, Section-62 (8): In factories and establishments wherein 50 (fifty) or more workers/ employees are employed, at least once in every 2 [6 (six) months] a mock fire-fighting shall be arranged and a book of records in this regards shall be maintained in the prescribed manner by the employer. Bangladesh Labour Rules 2015, Chapter-6, Section-55, (14): 14) As per Section 62(8), fire drills and emergency evacuation drills have to be arranged at least once in every six month period and the same has to be preserved in respective record books, in accordance with Form- 22. In addition, the concerned Inspector and nearby Fire Service Station have to be informed minimum 15 days before the drills are held.</p>	
ETI code	<p>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.</p>	
Explanation to the non compliance	<p>It was noted through document review, worker interview that - the external fire drill from FSCD (Fire Service and Civil Defence) wasn't conducted by the facility. However, the facility has conducted internal fire drill on 23 February 2023.</p>	
Follow up	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

method		
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the management should conduct the fire drill by the BFSCD at least twice a year	
Additional comments	Facility has conducted fire drill from fire service and civil defense on 14 March 2024. Facility has conducted fire drill from fire service and civil defense on 14 March 2024.	




Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395292	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	276 - Workers are not issued with appropriate Personal Protective Equipment (PPE)	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack awareness	
Local law issue	In accordance with Bangladesh Labour Rules, 2015, Rule 67 (2 & 3): 2) In addition to the arrangement of safety and health protection measures mentioned in Sub-section (1), the concerned manufacturing institute must provide necessary equipment, including safety shoes, helmets, goggles, masks, hand gloves, ear muffs, ear plugs, waist belts, aprons etc. and arrange training programs for the workers in using these materials and ensure their usage. 3) No worker can be employed in the relevant works without ensuring safety and health protection measures and the training related therewith. In addition, personal safety equipment must be preserved in accordance with Information Form-23.	
ETI code	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.	
Explanation to the non compliance	It was noted through the floor visit that 1 out of 1 Spot removing operators were not wearing hand gloves and Chemical masks while working in the spot removing room in 2nd floor of building 1.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	
		 1681369133764.JPEG

Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should ensure the proper PPE in the spot removing room.	
Additional comments	Spot removing operator was wearing required mask. 1 out of 1 Spot removing operator was wearing hand gloves and Chemical masks while working in the spot removing room.	

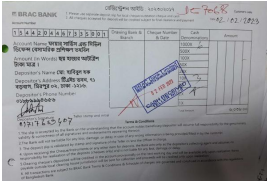

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395293	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	207 - Isolated occurrence of blocked fire exits	
Subcategory	Fire Safety - Fire exits	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labor Act 2006, Chapter- 6, Section – 62 (6): A free passage-way giving access to each way of exit in case of fire shall be provided for the use of the workers in every room of the establishment.	
ETI code	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.	
Explanation to the non compliance	It was noted through the floor visit that 2 out of 7 aisles were partially obstructed by production materials and cartoons in the sewing section which was located at 5th floor and in the finishing section which was located at 2nd floor of Building-1.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should ensure the pathway are free from any obstacle and ensure for the safe evacuation in case of emergency.	
Additional comments	Facility has provided obstruction free aisles all over the premises.	
		 <p>1681369101463.JPEG</p>  <p>1681369093863.JPEG</p>

	Facility has provided obstruction free aisles all over the premises.	
--	--	--

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600395294	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	145 - The company has not assigned responsibility for health and safety to a competent senior management representative	
Subcategory	Health & Safety Management	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	In accordance with Bangladesh Labor Rules 2015, section 55(12), Amendment 2022: 12) A trained officer shall be recruited in the factory/institute where at least 300 workers are employed. The duties of the officer shall be ensuring the preservation and maintenance of all fire-fighting equipments and keeping them fit and arranging trainings for the three teams mentioned in Sub-section 10 after every six-month period.	
ETI code	3.5 - The company observing the code shall assign responsibility for Health & Safety to a senior management representative.	
Explanation to the non compliance	It was noted through document review and management interview that the facility not yet appointed any fire safety officer in the facility.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility management shall recruit fire safety officer as per local law requirement.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395295	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	In accordance with The Bangladesh Labour Act, 2006, Section 63 (1- d, 3): 1) In every establishment the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the part of machinery required to be fenced are in mention or in use, namely- (d) unless they are in such position or of such construction as to be as safe to every person employed in the establishment as they would be if they were securely fenced- (iii) every dangerous part of any machinery:	 <p>1681368485240.JPEG</p>  <p>1681368400127.JPEG</p>  <p>1681368374149.JPEG</p>
ETI code	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.	
Explanation to the non compliance	"It was noted during facility visit that- a) approximately 15% needle guard found displaced with (plain) sewing machine in the sewing section located at 2nd and 5th floor in the production building. b) approximately 10% eye guard found displaced with overlock & flatlock machine in the sewing section located at 2nd and 5th floor in the production building."	
Follow up	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	

method		
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management should look after machine safety guards with all mentioned machines of the production area and ensure the proper usage of machine safety guards.	
Additional comments	Needle guard & eye Guard install with the machine. During current assessments it was noted that facility provided all machine guard and taken corrective action properly.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600395296	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	175 - Workers are not given appropriate fire safety, fire prevention and/or evacuation training	
Subcategory	Fire Safety - Licenses, Inspections & Training	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	"In accordance with The Bangladesh Labour Rules 2015, Rule 55 (10): (10) If possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable fire-repellant instruments. And the security has to be ensured by dividing the trained workers into fire-fighting team, rescue team and first aid team (6% members in each team) and the records related herewith have to be preserved in accordance with Form- 22. "	 1681377836775.JPEG
ETI code	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.	 1681377784181.JPEG
Explanation to the non compliance	It was noted through document review, workers and management interview that the facility did not have any certified fire fighter, rescuer and first aiders form BFSCD (Bangladesh Fire Service and Civil Defence). Note that facility needed 78 certified fire fighter, rescuer and first aiders form Fire Service Civil Defence according to 434 employees. Note that, the facility already applied to the concern authority for fire training but did not received any feedback yet. However, facility had internally fire fighters.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	



Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility management shall ensure required numbers of fire fighters, rescuers and first aiders trained from BFSCD.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600395298	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	147 - No / inadequate health and safety committee or representative(s) as required by law	
Subcategory	Health & Safety Management	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	<p>"Bangladesh Labour Act (Amendment) 2013, Section-90 (a): In every factory where 50 (fifty) or more workers are employed, there shall be a safety committee to be formed and functioned in the manner prescribed by rules. In accordance with The Bangladesh Labour Rules 2015, Rule 81 (1 & 8): 1) As per Section 90 (a), the Owners of the institute where 50 or more workers are employed or were employed in a certain period of time in the year shall form Safety Committee. However, Safety Committee must be formed within 6 (six) months of the application of this Code in the present factories/institutes or within 9 (nine) months of the application of this Code in the newly established factories/institutes. In addition, as per Section 183 if the institutes of a business group remain scattered in more than one sub-district/upazila or if the Owners work region-wise, then upazila/sub-district wise Safety Committee must be formed. 8) The Representative for joint bargaining shall nominate Workers' Representative from the workers working in each section, department, floor, storehouse and unit separately. Then, the nominated/elected Representative shall be included in the Safety Committee."</p>	
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.	
Explanation to the non compliance	It was observed through document review and management interview that safety committee was not selected in line with law as the facility did not have elected Worker Participation Committee (WPC). Moreover, the facility did not conduct any health and safety training, PPE training, safety orientation training to the workers.	

Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input checked="" type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility should form safety committee with the supervision of elected participation committee.	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600395299	
Clause	4 - Child labour shall not be used	
Issue Title	397 - Childcare facilities are not provided in alignment with legal requirements	
Subcategory	Child care & education	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
Local law issue	<p>"Bangladesh Labour Act 2006, Chapter-8, Section-94 (2): Such rooms shall provide adequate accommodation, adequately lighted and ventilated and maintained in a clean and sanitary condition and shall be under the charge of woman trained or experienced in the care of children and infants. Bangladesh Labor Rules 2015, Chapter-8, Section-94: 1) The layout, quality and position of the Children's Room or the separate Children Building or the adapted building must be approved by the Inspector General or the Inspector authorized by him/her. 2) A separate and screen covered area must be kept preserved for the breastfeeding mothers so that they can lactate their babies maintaining secrecy and modesty. 3) The floor of the Children's Room and the internal walls thereof with a height of 1.22 meters must be made smooth and impervious. 4) 0.25 liters of milk for each child and nutritious foods must be supplied for the children staying in Children's Room. Bangladesh Gazette, Extra, September 15, 2015 7375 5) Neat and clean clothes must be provided for the employees working in Children's Room. 6) Females must be prioritized while recruiting employees for the Children's Room. "</p>	
ETI code	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.	


Explanation to the non compliance	It was noted document review, workers and management interview that the facility had a childcare room but did not have functional as per law.			
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit			
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other			
Actions	It is recommended that the facility should arrange the childcare room as per the legal requirement.			
Additional comments	Facility has established a child care center. Facility has arranged the childcare room as per the legal requirement.			

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600412080	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	203 - Fire exits are inadequate by design/construction, location, etc.	
Subcategory	Fire Safety - Fire exits	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of knowledge of legal requirements	
Local law issue	BNBC Part 4, Chapter 3, Clause No. 3.7.5: 3.7.5 Protective opening leads to an exit shall be fire doors or fire windows or a fire assembly having a fire resistance rating of at least 20 minutes or more as per provisions of this Code. (a) Certified Fire resistance rating of Doors shall be in accordance with ASTM E152 without the hose stream test. (b) Fire resistance rating of the fire door assembly has to perform as required 20, 30, 60, 90, 180 minutes or more shall be leveled A, B, C, D, E and F respectively. (c) Fire door assembly of any approved materials shall qualify through ASTM E152 without the hose stream test.	 <u>Shutter Instead of Fire Door.JPG</u>
ETI code	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.	 <u>Collapsible Gate Instead of Fire Door.JPG</u>
Explanation to the non compliance	During floor visit & management interview, it was noted that the facility did not install fire rated door of all over the factory building. Noted that the facility installs collapsible gate & shutter instead of the fire rated door.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	

Actions	It is recommended that the facility shall install fire rated door as required by law.	
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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600412081	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	253 - Residential building converted to industrial with no evidence that legal requirements have been met	
Subcategory	Building/Site Maintenance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with building construction Act 1952, Section 3 (a): [3A. Restriction on improper use of lands and buildings.- (I) No owner or occupier of a building shall, without obtaining previous permission from the Authorized Officer or the Committee, as the case may be, use the building for the purpose other than that mentioned in the sanction. In Accordance with BNBC, Chapter-2, Section-2.1.7 (G), Buildings under this Occupancy group shall include any building or portion thereof in which materials are fabricated, assembled, or processed by physical, chemical, pharmaceutical, nuclear, mechanical and other processes, in order to alter their characteristics or to produce or manufacture new materials. Such buildings may also house incidental storage and handling of the raw and the finished materials or goods. Examples of such buildings are various mills, factories and plants, automatic laundries, power plants, pumping stations, smoke houses, saw mills, foundries and machine shops, pharmaceutical, nuclear and irradiation plants.	
ETI code	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.	
Explanation to the non compliance	It was noted that facility did not have any approved industrial permission. Facility has obtained six storied building approval plan from B C Committee	

	Rajuk (Rajuk/599/03/9031/2) which is permitted to use as a commercial building. Moreover, in the roof top facility has Dining, canteen, prayer room and wastage areas which is not permitted by concerned authority.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory management should obtain building approval from concern authority as soon as possible	

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600412084	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	297 - Workers exposed to dangerous fumes / dangerous gas levels	
Subcategory	Worker Health	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Bangladesh Labour Law 2006, Section 78 (1 & 2): 78. Explosive or inflammable dust, gas, etc. : (1) where in any establishment any manufacturing process produces dust, gas, fume or vapour of such character and to such extent as to be likely to explode on ignition, all practicable measures shall be taken to prevent any such explosion by- (a) effective enclosure of the plant or machinery used in the process; (b) removal or prevention of the accumulation of such dust, gas, fume or vapour; (c) Exclusion or effective enclosure of all possible sources of ignition. (2) Where in any establishment the plant or machinery used in a process is not so constructed as to withstand the probable pressure which such an explosion as aforesaid would produce, all practicable measure shall be taken to restrict the spread and effects of the explosion by the provision in the plant or machinery of chokes,	
ETI code	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.	
Explanation to the non compliance	During the plant tour and workers and management interview, it was noted that the facility did not install any doors in the spot-removing room where 833 spot lifters were used.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days	
		 <p><u>No door in the spot removing room.JPG</u></p>

	<input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the facility shall install spot removing room's door as soon as possible.	

Corrective Action Plan - Observations

Observation		Evidence
[Back to findings summary]		
Observation		
Status	CLOSED	
Reference	ZAF600395297	
Clause	0B - Management systems and code implementation	
Issue Title	7 - SAQ was shared with the auditor, but the SAQ answers are purposefully misleading / inaccurate	
Subcategory	Audit process	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA600008624	
Resolved by audit	ZAA600055087	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Lack of awareness	
ETI code	0.B.1 - Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Explanation to the observation	They did not complete the SAQ due to technical problem.	
Actions	The site would finalise the SAQ within the next month.	
Additional comments	SAQ 100% completed by Factory. During SAQ review, it was observed that the facility had SAQ completed 100% on the sedex platform.	

Corrective Action Plan - Good Examples

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600412082	
Clause	5 - Living wages are paid	
Issue Title	429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport	
Subcategory	Benefits & Insurance	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility provides monthly attendance bonus BDT 400 to operators and BDT 300 to helper as per factory policy.	
Evidence	Payroll records review and workers & management interview.	

Good Example		Evidence
[Back to findings summary]		
Good Example		
Status	OPEN	
Reference	ZAF600412083	
Clause	0B - Management systems and code implementation	
Issue Title	14 - Excellent Human Resource (HR) policies and practices in place	
Subcategory	Site's Management systems & Monitoring	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	The facility arranged annual picnic for all workers regularly as per company policy.	
Evidence	Documents review, workers & management interview.	

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Romana Rahman	APSCA Number:	21705635
Additional Auditors:	Md. Abdullah Al-Mamun		32200120
	Md. Tanvir Hasan Khan		32200442
Date of declaration:	2024-03-23		

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

Site Representation	
Full Name:	Md. Habibul Haque
Title:	HR & Compliance officer
Date of declaration:	2024-03-23
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a “root cause”

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.



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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

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