

Sedex Members Ethical Trade Audit Report



	Audit Details									
Sedex Company Reference: (only available on Sedex System)		ZC131508653		Sedex Site Reference: (only available on Sedex System)			ZS131514741			
Business name (C name):	ompany	ELF Co Lt	d							
Site name:		ELF Co Lt	d							
Site address:		75 Moo 10, Bang Kru, Phrapradaeng, Samutprakarn, Phrapradaeng 10130 TH		Country:		TH				
Site contact and jo	b title:	Mr. Roy M	ledvedi / P	roducti	on Manager					
Site phone:		02463218	3		Site e-mail:			raymond@elf925.com		m
SMETA Audit Pillars:		☑ Labo Stan	our dards		Health and Safety (plus Environment 2-Pillar)		Environi 4-pillar	ment	Busines Ethics	SS
Date of Audit:		2023-09-20								
			Aud	it Com	pany Name:					
			BUREAU	J VERI	TAS CPS - AS	IA				
Audit Conducted By										
Affiliate Audit Company	~	Purchaser				Retailer				
Brand owner		ı	NGO		Trade Ur		nion			
Multi-stakeholder				Combined Au	ıdit (s	elect all tl	hat appl	y)		

Audit Content:

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

Auditor Team						
Lead Auditor:	Pichayanan Jantachote	APSCA Number:	21701766			
Additional Auditors:	Nuttha Sae-Liaw		32200620			
Date of declaration:	2023-09-21					

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:	Mr. Roy Medvedi			
Title:	Production Manager			
Date of declaration:	2023-09-21			

Comments:

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

Nil

Audit company:

Report reference: ZAA600026243

Start Date: 2023-09-20 End Date: 2023-09-21



Summary of Findings

Issue		a of informity	Nui	mber of iss	ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1	§1	0	3	0	Obs - ZAF600170591 Obs - ZAF600170592 Obs - ZAF600182968
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

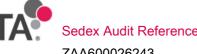
Issue	Description
§1	The Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Hazardous Chemical B.E.2556 (2013) Clause 11 for the chemical working area, the employer shall provide the workplace and equipment to have at least the following requirements in order to protect and prevent health and safety of employees; (1) Chemical wash station which the employees can use immediately for the emergency case; at least chemical eye wash station and body shower station. (2) Washing hands and washing face not less than one place per fifteen employees and the number shall be proportionately increased of employees, the excess of seven persons shall be deemed fifteen persons. (3)Not less than one bath room for washing the body per fifteen employees and increasing the number according to the proportion of employees. The excess of seven persons shall be regarded as fifteen persons. Enough purification of harmful chemicals from the body and use it at all times. (4)Equipment and medical supplies necessary for first aid to an employee who has been harmed by hazardous chemicals. (5)Fire extinguishing equipment suitable for each type of hazardous chemical and sufficient for initial firefighting. (6) Work clothes specifically for employees who work with hazardous chemicals and the storage of such used work clothes to be suitable for that category of hazardous chemicals

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Site Details

	Site Details				
Company Name	ELF Co Ltd				
Site Name	ELF Co Ltd				
GPS location (if available)	GPS Address: 75 Moo Tambol BangKru, Aump Phrapradaeng, Samutp 10130 75 หมู่ 10 ตำบลบา อำเภอพระประแดง จังหวัดสมุทรปราการ 1013				
	Coordinates:	Latitude: 13.63389, Longitude: 100.52741			
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license number: 0105545062504 (18 June 2002), Factory license number: 20111300525590 (3-84(1)-5/59), 20110900525604 (3-84(1)-5/60)				
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of Silver Jewellery				
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	There was 2 main facility building 5,195 square meters. The facility 2002 (21 years) as per the busing activities, the facility manufacturing Jewelry. The main production prowere included wax injection, cast setting, polishing, laser, cleaning, shipping. The production capacity pieces per month. The facility his facility including 16 management 68 office/admin staff (19 females employees (46 females and 383 females). They were hiring as not employment contract. No temporation workplace. For office the regular Monday to Friday for only one shone hour rest/meal start from 12:	g, Samutprakarn 10130, Thailand. Is which occupied approximately has established since 18 June less license. For the scope of ling was specialized of Silver occesses performed in the facility ing, filing, tumbling, welding, gluing, plating, QC, packing and y was approximately 1,000,000 red 524 employees to work at the staff (4 females and 12 males), and 49 males), 432 production males), and 11 direct cleaners (11 infixed term permanent ary employee was hired in the reworking hour was operated from ifft started from 09:00-18:00 with 00-13:00. For production our was operated from Monday to om 09:00-19:00 with one hour Saturday and Sunday was as another 20 minutes overtime work operation. All employees Monthly rate was issued for one (Pay period from 26th –25th). That is basis was issued since or saturday bank transfer. The facility			

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	Γ		I			
Structure and number of buildings	Building Name:	Т	Production Building 1			
	Floor	Descriptio	n	Remark		
	QC, P Polish Expor Dining		ding, t stone, ng, Cleaning,	Nil		
	Building Name:		Production	Building 2		
	Floor	Descriptio	n	Remark		
	1	Wire knittii Sample, P Wastewate	lating,	Nil		
Visible structural integrity issues (large	☐ Yes ☑ No					
cracks) observed?	Please give details:					
	There was no visible la	arge crack	during the s	ite observation.		
Does the site have a structural engineer evaluation?	☑ Yes □ No					
	Please give details:					
	The facility conducted the structural building evaluation an The recent structural evaluation was conducted on 26 Jun					
Site function	□ Agent			ry ssing/Manufacturer		
	☐ Finished Product	Supplier	□ Growe	er		
	☐ Homeworker		□ Labou	r Provider		
	☐ Pack house		□ Primaı	ry Producer		
	□ Service Provider		□ Sub-co	ontractor		
Months of peak season	September to January	<u>'</u>				
Process overview	The facility manufacturing was specialized of Silver Jewelry. The main production processes performed in the facility were included wax injection, casting, filing, tumbling, welding, setting, polishing, laser, cleaning, gluing, plating, QC, packing and shipping. The production capacity was approximately 1,000,000 pieces per month. The main machines and equipment were Laser machine. Welding machine, Ultrasonic cleaning machine, polishing machine Plating machine, Stamping machine, stone setting machine, Epot machine, oven, etc.					
What form of worker representation is there on site?	□ Union		Worke	er Commitee		
OII SILE!	□ Other		□ None			
Please give details:	The Welfare Committe	ее				
Is there any night production work at the site?	☐ Yes ☑ No					
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No					
accommodation buildings	Please give details:					

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Are there any off site provided worker accommodation buildings	☐ Yes ☑ No
accommodation buildings	Please give details:
Were all site provided accommodation buildings included in this audit	☑ Yes □ No
buildings included in this addit	Please give details:

Audit Parameters						
Time in and time out	Day 1		Day 2			
	In	09:40	In	09:00		
	Out	17:00	Out	14:00		
Audit type:	PERIODIC					
Was the audit announced?	SEMI_ANNOUNCED					
Was the Sedex SAQ available for review?	No					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	lit No					
Who signed and agreed CAPR	Mr. Roy Medvedi / Production Manager					
Is further information available	No					

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Start Date:

End Date:

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		
Reason for absence at the opening meeting	There was no Trade Union established at the facility and it was not required by local law.				
Reason for absence during the audit	There was no Trade Union established at the facility and it was not required by local law.				
Reason for absence at the closing meeting	There was no Trade Union law.	established at the facility and	it was not required by local		

Worker Analysis

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

	Worker Analysis							
		Local			Migrant*		Home	
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	57	0	0	0	0	0	0	57
Worker numbers – female	383	0	0	0	0	0	0	383
Total	440	0	0	0	0	0	0	440
Number of Workers interviewed – male	5	0	0	0	0	0	0	5
Number of Workers interviewed – female	37	0	0	0	0	0	0	37
Total – interviewed sample size	42	0	0	0	0	0	0	42

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	Nationalities Structure			
Nationality of Management	Thai			
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: THAI	approx %: 100%		
Was this list completed during peak season?	✓ Yes □ No Please give details:			
Worker remuneration	Workers on piece rate:	0%		
	Paid hourly:	0%		
	Salaried:	100%		
Payment cycle	Paid daily:	0%		
	Paid weekly:	0%		
	Paid monthly:	100%		
	Other:	0%		
	Details for other:	N/A		

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Worker Interview Summary	
Were workers aware of the audit?	☑ Yes □ No
Were workers aware of the code?	☑ Yes □ No
Number of group interviews:	6 groups of 5
Number of individual interviews:	Male: 5 Female: 7
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.	✓ Yes □ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	Neither negative comments nor complaints were noted.
What did the workers like the most about working at this site?	Working Environment and Benefits.
Any additional comment(s) regarding interviews:	Nil
Attitude of workers to hours worked:	The general attitude of sampled employees was in positive side and favourable. They were pleasure with compensation, benefits and workplace environment.
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

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Attitude of workers:

Sampled employees were randomly selected for employee interviews from different sources. The general attitude of them was in positive side and favourable. Neither negative comment nor complaint was noted. Most employees have been working in the facility for years and confirmed that the facility management was friendly and treated them well. They could freely express their opinions and comments directly to supervisor or management. They were pleasure with compensation, benefits and workplace environment.

Attitude of worker's committee/union reps:

The general attitude of Welfare Committee was in positive side and favourable. Neither negative comment nor complaint was noted. They conducted the regular meeting with facility management for every month. They were not disturbed or interfered by the facility management. The employees were freely and comfortable to express their comments to them.

Attitude of managers:

The facility management was professional, positive and cooperative during the audit day. Auditors were permitted in full access to all required information, document review, employee interview, and facility observation. At the closing meeting, auditors explained strengths and weaknesses as well as all non-compliance issues found in the facility. They confirmed to implement and take appropriate corrective action to be in compliance with the ETI requirement and local law in a long term condition.

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

0A: Compliance Requirements

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
- 0.A.3 Businesses shall identify their stakeholders and salient issues.
- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined

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

Current Systems:

The facility established the written policies and procedures covered human rights impacts, forced labour, harassment & abuse and communicated to all appropriate parties and suppliers. The transparent system was also in place for confidential reporting and dealing with human rights impacts without fear of reprisals towards the reporter. They were aware of Universal right covering UNGP. The responsible person for implementing standards concerning Human rights was designated.

Evidence examined:

Factory rules and regulations, Company Policy and Procedure, Code of Conduct, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other comments:	
Nil	

Policy statement that expresses commitment to respect human rights?	☑ Yes □ No
and the second s	Please give details:
	The facility established the written policies and procedures covered human rights impacts, forced labour, harassment & abuse and communicated to all appropriate parties and suppliers.
Are the policies included in workers' manuals?	☑ Yes □ No
	Please give details:
	The human rights policies were included in the workers' manual.
Does the business have a designated person responsible for implementing	☑ Yes □ No
standards concerning Human Rights?	Please give details:
	Name: Ms. Nareewan Cheejaiarn, Job title: HR Manager

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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)	0.35%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year This year	0.43% 0.18%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 12 month	0.0% 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 12 month	0.0% 0.0%

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

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

The facility has provided a responsible team to implement the company regulations for operating the facility and train to the employees accordingly. The Code of Conduct and facility's rules and regulations were visible posted and communicated to employees. During this audit, auditor was accessible to required document review, facility observation and employee interview including required payroll and time attendance records. Auditor crosschecked both required payroll and time attendance records provided by facility management with production and other relevant records and employees interviewed.

Evidence examined:

Business License, Factory license, Export license, Factory rules and regulations, Code of Conduct, Training records, etc.

Details:

- Document review
- Employee interview
- Management interview

Δnv	other	comm	onte:

Nil

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No Please give details:
	During the audit, there was no evidence to present that facility was subject to any fines/prosecutions for non-compliance to any regulations.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	 ✓ Yes □ No Please give details: The facility established the policies and procedures to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Through documents reviewed and employees interviewed, the written policies and procedures (No forced labour, No child labour, Non-discrimination, Anti-harassment and abuse) were communicated to employees via notification board and training.

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Have managers and workers received	□ Voc. □ No.
Have managers and workers received training in the standards for forced labour,	☑ Yes □ No
child labour, discrimination, harassment & abuse?	Please give details:
	Managers, supervisors and employees were communicated the written standards for forced labour, child labour, discrimination, harassment & abuse by notification board and training.
If Yes, is there evidence (an indication) that training has been effective e.g. training	☑ Yes □ No
records etc.? Please give details	Please give details:
	The facility arranged training to reduce the risk of forced labour, child labour, discrimination, harassment & abuse for mid-level management & workers via orientation training.
Does the site have any internationally recognised system certifications e.g. ISO	☑ Yes □ No
9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	Please give details:
otilei social addits):	ISO 9001:2015, Certification No. SCUK006898Q, Issued 04 September 2023 valid until 03 September 2026.
Is there a Human Resources	☑ Yes □ No
manager/department?	Name: Ms. Nareewan Cheejaiarn Job title: HR Manager
Is there a senior person /manager responsible for implementation of the code?	☑ Yes □ No
responsible for implementation of the code:	Please give details:
	Name: Mr. Roy Medvedi, Job title: Production Manager
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No
	Please give details:
	The facility established the policies and procedures that all documentation and data relating to employees were surely kept confidential. The responsible person was designated.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes □ No
confidential information is kept confidential:	Please give details:
	The facility established the policies and procedures that all documentation and data relating to employees were surely kept confidential. The responsible person was designated.
Are risk assessments conducted to evaluate policy and procedure	☑ Yes □ No
effectiveness?	Please give details:
	The facility annually evaluated an effectiveness of policies and procedures and revised as required.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☑ Yes □ No
	Please give details:
Total to rough individual fields	Risk assessments were regularly conducted by a responsible team to address issues and implement the corrective action plan to be taken within the timeline in order to control or/and reduce identified risks in the workplace.

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Does the facility have a policy/code which require labour standards of its own suppliers?	☑ Yes □ No
	Please give details:
	The facility have written policy/code which required labour standards of its own suppliers and it was effectiveness of management system to monitor and evaluate its own suppliers regarding the compliance status of labour standards.
	Land Rights
Does the site have all required land rights licenses and permissions (see SMETA	☑ Yes □ No
Measurement Criteria)?	Please give details:
	The facility hold the ownership and rights over the whole facility building and land as per agreement sublease (Contract period every 3 years between 1 Mar 2022 - 28 Feb 2025).
Does the site have systems in place to	☑ Yes □ No
conduct legal due diligence to recognize and apply national laws and practices	Please give details:
relating to land title?	The facility designated an authorized person to recognize and apply national laws and practices relating to land title.
Does the site have a written policy and	☑ Yes □ No
procedures specific to land rights?	Please give details:
	The facility has established a written policy and procedure to specific land right based on legal requirement and include legal land acquirement and free, prior and informed consent (FPIC).
Is there evidence that facility/site	☑ Yes □ No
compensated the owner/lessor for the land prior to the facility being built or expanded?	Please give details:
	The facility hold the ownership and rights over the whole facility building and land as per agreement sublease (under agreement sublease with lessor).
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☑ Yes □ No
	Please give details:
	The facility has obtained all licenses as legally required and properly maintained.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	☐ Yes ☑ No
	Please give details:
	There was no any evidence of illegal appropriation of land for facility building or expansion of footprint.

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1 - Freely chosen Employment [Summary of Findings]

- 1: Compliance Requirements
- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

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

Current Systems:

The facility established written policies and procedures to prohibit for forced, bonded or involuntary labour. Employees were not required to lodge "deposit" or their original identity personal documents (ID card, Passport, Work permit, etc.) with their employers. The employees have a freedom to leave the facility during lunch break and working shift ended. They can access into toilet and drinking water during working hours without any freedom of movement restriction. All employees found working voluntarily during audit in the facility.

Evidence examined:

Facility policies and procedures, Facility rules and regulations, Employees' personnel files, Training records, Recruitment Notification, Employment Agreement, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other	comment	S
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Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes,	□ Yes ☑ No
please give details and category of workers affected)	Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and	□ Yes ☑ No
category of workers affected)	Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	□ Yes ☑ No
	Please give details:
Are there any restrictions on workers' freedom to terminate employment?	□ Yes ☑ No
	Please give details:
	There was no solid evidence that the facility restricted the movement of employee upon the rights to terminate the contract.
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 ☑ Not Applicable
	Please give details:
	N/A

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Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	✓ Yes □ No Please give details:
	During the audit date, auditors could observed that employees were able to freely leave the work stations.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☑ Yes □ No □ Not Applicable Please give details:
	Based on written policies and procedures review and facility management interview, the facility have awareness of the risk of forced / trafficked / bonded labour in its supply chain. The risk assessment was regularly conducted in the facility.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes □ No Please give details:
	N/A

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2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

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

Current Systems and Evidence Examined

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

Current Systems:

Based on document reviewed and facility management interviewed, it was noted that all employees would freely raise any comments or complaints to supervisor or facility management. During employees interviewed, sampled employees stated that they were comfortable to express their viewpoints to their supervisor and management. Suggestion box was placed in the common area as a grievance channel. The Welfare Committee was democratically elected by all employees which was not disturbed or interfered by the facility management and they legally conducted the regular meeting with facility management for every 3 months.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Grievance records, Minute of meeting records, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other comments:		
Nil		

What form of worker representation/union is there on site? (Please add the name of the	□ Union	☑ Worker Commitee
union or committee in the textbox)	□ Other	□ None
Other details:	Welfare Committee	
Is it a legal requirement to have a union?	☐ Yes ☑ No	
Is it a legal requirement to have a worker's committee?	☑ Yes □ No	
Is there any other form of effective worker/management communication	☑ Yes □ No	
channel? (Other than union/worker committee e.g. H&S, sexual harassment)	Please give details:	
osto o.g. rise, soxual harassment)	Suggestion box, Opened-Door Po	olicy etc.
Is there evidence of free elections?	☑ Yes □ No	

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Does the supplier provide adequate facilities to allow the Union or committee to	☑ Yes □ No
conduct related business?	Please give details:
	The Worker Welfare Committee freely conducted the regular meeting at the meeting room. They were not interfered or disturbed by facility management.
Name of union and union representative, if applicable:	N/A
Is there evidence of free elections?	✓ Yes □ No □ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Welfare Committee
Is there evidence of free elections?	☑ Yes ☐ No ☐ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes □ No
representatives are:	Please give details:
	The employees were aware of their Welfare Committee representatives.
Were worker representatives freely elected?	☑ Yes □ No
Date of last election:	2022-01-21
Do workers know what topics can be raised with their representatives?	☑ Yes □ No
Were worker representatives/union representatives interviewed?	☑ Yes □ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Welfare committee regularly conducted the meeting for every month. The minutes of meeting records were properly documented and maintained and communicated via the public notification board. The latest meeting was conducted on 31 August 2023. The topics were covered canteen cleaning, pest control, and the new uniform replacement.
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

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Start Date: 2023-09-20

End Date: 2023-09-21

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

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

Current Systems and Evidence Examined

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

Current Systems:

The health and safety conditions of the facility were favourable. The facility properly maintained a comfortable temperature and environment throughout the workplace. The facility properly maintained a commontable temperature and environment throughout the workplace. The first aid supplies and first aid room were provided during the regular working hours. Potable water was freely available in all areas and regularly inspected. Sufficient toilets segregated by gender were available at all times to employees. Fire-fighting equipment was monthly inspected by assigned safety officer and external certified third party. Employees were regularly obtained with the annual fire evacuation drill and fire-fighting equipment training for at least once time a year which conducted by the local authority as legally required. Chemical containers were labelled and stored with secondary containments at where chemicals were used and stored. Material Safety Data Sheets (MSDS), PPE & safety warning signs were posted in native languages that understood by all employees.

Evidence examined:

Factory policies and procedures, Training records, Certificates, Fire equipment maintenance records, Machine maintenance records, Production flow chart, Fire evacuation drill records, Government licenses, Working Environmental inspection records, Accident records, MSDS, Chemical list, Electricity inspection etc.

Details:

- Facility Observation
- Document review

- Employee interview Management interview
Any other comments:
Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

☑ Yes □ No

Please give details:

The facility established the written policies and procedures based on occupational Health & Safety practices in place covering both for the workplace and employees. They were communicated to employees via training and notification board in native languages that understood by all employees.

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Are the policies included in workers' manuals?	☑ Yes □ No
mandale.	Please give details:
	The occupational Health & Safety policies and procedures were included in the employee's manual book in native languages that understood by all employees.
Are there any structural additions without required permits/inspections (e.g. floors	☐ Yes ☑ No
added)?	Please give details:
	There were no any structural additions during the audit date.
Are visitors to the site informed on H&S and provided with personal protective	☑ Yes □ No
equipment?	Please give details:
	The facility established policies and procedures for visitors to be informed on the relevant Health & Safety information and provided PPE before visiting the site.
Is a medical room or medical facility provided for workers?(This section is to list	☑ Yes □ No
evidence to support system description	Please give details:
(Documents examined & relevant comments. Include renewal/expiry date where appropriate))	One medical room, necessary medicines and one certified technical nurse were provided in the facility during working hours as legally required.
Is there a doctor or nurse on site or there is	☑ Yes □ No
easy access to first aider/ trained medical aid?	Please give details:
	One medical room, necessary medicines and one certified technical nurse were provided in the facility during working hours as legally required.
	The first aid team was periodically obtained the first aid training by the certified third party since with the recent training on 5 September 2023.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and	☑ Yes □ No
operated by competent persons e.g. buses	Please give details:
and other vehicles?	The facility provide the daily transportation for employees far from the facility and the transportation condition was fit for the employees.
Is secure personal storage space provided for workers in their living space and is fit for	☑ Yes □ No
purpose?	Please give details:
	The facility properly provided personal storage and space with locking devices for employees in the workplace and accommodation.
Are H&S Risk assessments are conducted (including evaluating the arrangements for	☑ Yes □ No
workers doing overtime e.g. driving after a	Please give details:
long shift) and are there controls to reduce identified risk?	The health and safety risk assessments were regularly conducted at least once a year to develop and maintain an action plan and ensure that all identified risks were controlled, prevented and remediated.

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End Date:

Is the site meeting its legal obligations on environmental requirements including	☑ Yes □ No
required permits for use and disposal of natural resources?	Please give details:
matural resources:	The facility obtained the environmental protection permits from the local authority for the current period which were covered the use and disposal of any natural resources. The occupational health and safety committee monthly conducted the meeting as legally required.
Is the site meeting its customer requirements on environmental standards,	☑ Yes □ No
including the use of banned chemicals?	Please give details:
	The facility obtained the environmental protection permits from the local authority for the current period which were covered the use and disposal of any natural resources. The occupational health and safety committee monthly conducted the meeting as legally required.

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	Observat	tion	Evidence
Back to findings	summary]		
	Observat	tion	
Status	CLOSED		
Reference	ZAF600170591		
Clause	3 - Working Condition	ns are Safe and Hygienic	
Issue Title	209 - Not all emergen lighted	ncy exits are properly marked and	
Subcategory	Fire Safety - Fire exits	s	
New or carried over?	□ New		
Raised by audit	ZAA421442770		
Resolved by audit	ZAA600026243		
Root cause	☐ Training	□ System	
	□ Costs	☐ Lack of workers	
	☑ Other		
Root cause - Other	N/A		
Explanation to the observation		exit signs were not illuminated a (building name A4 A5).	
Actions	N/A		
Additional comments	the exit signs to be illuprocedure were established happen in the future.	tely addressed the issue by fixing uminated. The policy and blished to prevent the incident to tely addressed the issue.	

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	Observation		
[Back to findings s	summary]		
	Observation		
Status	CLOSED		
Reference	ZAF600170592		
Clause	3 - Working Conditions are Sa	afe and Hygienic	
Issue Title	214 - No evacuation plan or d	esignated emergency exit	
Subcategory	Fire Safety - Fire alarms & Ev	acuation	
New or carried over?	□ New	☑ Carried Over	
Raised by audit	ZAA421442770		
Resolved by audit	ZAA600026243		
Root cause	□ Training	□ System	
	□ Costs	☐ Lack of workers	
	☑ Other		
Root cause - Other	N/A		
Explanation to the observation	It was noted that no evacuation dining area (building name A4		
Actions	N/A		
Additional comments	The facility appropriately addr the evacuation maps all over policy and procedure were es prevent the incident to happed The facility appropriately addr	the canteen area. The tablished for this issue to in the future.	



	Observation	Evidence
[Back to findings	summary]	
	Observation	
Status	OPEN	
Reference	ZAF600182968	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	242 - No / inadequate eye wash / shower station in hazardous environments including chemical areas	
Subcategory	Chemicals	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☐ System	
	☐ Costs ☐ Lack of workers	
	☑ Other	
Root cause - Other	Lack of Monitoring	
Local law issue	The Ministerial Regulation on the Prescribing of Standard for Administration and Management of Occupational Safety, Health and Environment in Relation to Hazardous Chemical B.E.2556 (2013) Clause 11 for the chemical working area, the employer shall provide the workplace and equipment to have at least the following requirements in order to protect and prevent health and safety of employees; (1)Chemical wash station which the employees can use immediately for the emergency case; at least chemical eye wash station and body shower station. (2)Washing hands and washing face not less than one place per fifteen employees and the number shall be proportionately increased of employees, the excess of seven persons shall be deemed fifteen persons. (3)Not less than one bath room for washing the body per fifteen employees and increasing the number according to the proportion of employees. The excess of seven persons shall be regarded as fifteen persons. Enough purification of harmful chemicals from the body and use it at all times. (4)Equipment and medical supplies necessary for first aid to an employee who has been harmed by hazardous chemicals. (5)Fire extinguishing equipment suitable for each type of hazardous chemical and sufficient for initial firefighting. (6)Work clothes specifically for employees who work with hazardous chemicals and the storage of such used work clothes to be suitable for that category of hazardous chemicals	Low Pressure Eyewas Station.JPG Eyewash Station Wate Pressure Fixed.JPG
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 observation	Description of Non-Compliance: It was noted that the 1 out of 1 eyewash station at the Put Stone-Ferido section could not function properly (low pressure of water on the left side). ประเด็นความไมสอดคลอง: จากการตรวจสอบุพบวาอางลางตา 1 จาก 1 อาง ในห้อง Put Stone-Ferido ไมสามารถใช้งานได้อย่างเต็มประสิทธิภาพ (แรงดันน้ำไม่เทากัน ข้างซ้ายแรงดันน้ำออน) Remark: The facility fixed the issue before the end of the audit date. หมายเหตะ ทางโรงงานได้ทำการแก้ไขหน้างาน ให้ระดับน้ำของอางล้างตาเทากัน กอนสิ้นสุดวันตรวจประเมิน	
Actions	Recommended Corrective Action: It is recommended that the facility shall ensure that the water pressure of all eye wash station could function properly and equally on both sides. แนวทางการแกไข: ขอแนะนำให้ทางโรงงานทำใหมั่นใจได้ว่า ระดับน้ำของอางล้างตาทั้งหมดสามารถมีความเท่ากันทั้งสองข้า ง	

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

- 4: Compliance Requirements
- 4.1 There shall be no new recruitment of child labour.
- 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current Systems:

Based on the written policies and procedures, the facility did not recruit the applicants who were below 18 years old which were above the legal minimum age of 15 years old. The applicants were required to proof age by providing the original ID card, House registration during the recruitment process. All copies of these documents were appropriate kept on personal employee files. Based on facility observation, nobody in production floor looked like child or young labour. The auditor also checked and verified the sampled employee personal files to ensure that the age of them was permitted by local law; The minimum age of employees was 18 years which was complied with the local law. Children were not either authorized to access into the facility perimeter. No child labour was noted.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Employee name list, Employee' personnel files (Medical certificate, Job application, Age documentation, Employment contract), etc.

Details:

- Document review
- Employee interview
- Management interview

Any other	comments:
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Nil

Legal age of employment:	15
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No
3 1 1 1	Please give details:
	N/A

Audit company:

Report reference:

Start Date:

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5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

concerned each time that they are paid.

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

Current Systems and Evidence Examined

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

Current Systems:

The legal minimum wage of Samutprakarn which was the facility's location was officially announced to be THB 353 per day (For a daily rate basis) / THB 10,590 per month (For a monthly rate basis) from October 1, 2022 onwards as a new legal minimum wage.

All employees were paid as monthly rate basis. Monthly rate was issued for one time a month in every 30th /31st (Pay period from 26th -25th). The last full payment of monthly rate basis was issued since 31 August 2023. Wages were paid by bank transfer. The facility currently utilized a finger scanning system to record work attendance for all employees.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Employee name list, Employee' personnel files, Employment contract, Payroll records, Pay slips, Time records, Leave records, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other comments:

Nil

Summary Information				
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?	
Standard/Contracted work hours:	Legal Maximum	Actual	NO	
(Maximum legal and actual required	Per Day: 8.0	Per Day: 8.0		
working hours excluding overtime, please	Per Week: 48.0	Per Week: 45.0		
state if possible per day, week, and month)	Per Month: null	Per Month: 198.0		
Overtime hours:	Legal Maximum	Actual	NO	
(Maximum legal and actual overtime hours,	Per Day: null	Per Day: 0.0		
please state if possible per day, week, and	Per Week: 36.0	Per Week: 0.0		
month)	Per Month: null	Per Month: 0.0		

Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 353.0 Per Week: null Per Month: 10590.0	Actual Per Day: 353.0 Per Week: 2471.0 Per Month: 10590.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 66.18 Per Week: null Per Month: null	Actual Per Day: 66.18 Per Week: 0.0 Per Month: 0.0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	☑ Yes □ No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	42 sample records of employees in August 2023 (recent month) 42 sample records of employees in May 2023 (low month) 42 sample records of employees in December 2022 (peak month)		
Are there different legal minimum wage grades? If Yes, please specify all.	☐ Yes ☑ No		
If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	□ Below legal min□ Meet☑ Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	The sample employees were compensated above the minimum wage to 11,000 THB/month for the salary excluded other benefits such as 500 THB diligent allowance and 1,900 THB incentive allowance.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:N/A Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	5% of basic wage excluded overtime wage and other incomes were legally required to be deducted to Social Security Fund.		
Have these deductions been made?	☑ Yes □ No		
Please list all deductions that have been made.	Social Security Fund		
Please list all deductions that have not been made.	None		
Were appropriate records available to verify hours of work and wages?	☑ Yes □ No		
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No		

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Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☑ Yes □ No		
	Please give details:		
for their time)	The facility provided payroll & time attendance records to auditors for review, they were clearly indicated in and out time.		
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☑ No		
	Please give details:		
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:		
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		
	Please give details:		
	The facility annually made the periodic review of wages for consideration to basic needs of employees plus discretionary incomes.		
Are workers paid in a timely manner in line with local law?	☑ Yes □ No		
Is there evidence that equal rates are being paid for equal work:	☑ Yes □ No		
paid for equal work.	Please give details:		
	Based on the facility policies and procedures and payroll records review and employee interview, it was noted that equal rates were paid based on equal work. The promoting was based on individual skills and experiences.		
How are workers paid:	□ Cash □ Cheque		
	☑ Bank Transfer □ Other		

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Start Date: End Date:

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

- 6: Compliance Requirements
- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

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

Current Systems:

For office the regular working hour was operated from Monday to Friday for only one shift started from 09:00-18:00 with one hour rest/meal start from 12:00-13:00. For production employees the regular working hour was operated from Monday to Friday for only one shift started from 09:00 -19:00 with one hour rest/meal start from 13:00-14:00. Saturday and Sunday was provided as a rest day.

There was another 20 minutes overtime break provided before overtime work operation

The facility currently utilized an employee finger scanning system to record work attendance for all employees.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Employee name list, Employee' personnel files, Employment contract, Payroll records, Pay slips, Time records, Leave records, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other con	nments
---------------	--------

Nil

Working hours' analysis				
Systems & Processes				
What timekeeping systems are used?	Finger Scanning System			
Is sample size same as in wages section?	☑ Yes □ No			
	Please give details:			

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Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes □ No
Are there any other types of contracts/employment agreements used?	☐ Yes ☑ No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	□ Yes ☑ No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)
Is this allowed by local law?	☑ Yes □ No
Maximum number of days worked without a day off (in sample):	5
Stand	ard/Contracted Hours worked
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	□ Yes ☑ No
	Overtime Hours worked
Actual overtime hours worked in sample (State per day/week/month)	August 2023 (recent month) no overtime working was identified. May 2023 (low month) no overtime working was identified. December 2022 (peak month) no overtime working was identified.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: N/A
Approximate percentage of total workers on highest overtime hours:	0.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	 ✓ Yes □ No □ Conflicting Information Please give details: Overtime policies and procedures, employee interview, etc.
	Overtime premium

Audit company:

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End Date:

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard				
wages)	Please give details:			
	Legal overtime premium rate for weekly day: 150% of hourly basic wage for weekly day; Legal overtime premium rate for rest day/public holiday: 100% of hourly basic wage for regular working hour on rest day/public holiday and; 300% of hourly basic wage for overtime working hour on rest day/public holiday.			
Is overtime paid at a premium?	✓ Yes ☐ No 100% of production employees were properly compensated for overtime at a premium rate as the following details; 150% of hourly basic wage for weekly day. 100% of hourly basic wage for regular working hour on rest day/public holiday and; 300% of hourly basic wage for overtime working hour on rest day/public holiday. As per written overtime policies and procedures.			
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 □ Collective Bargaining agreements □ Other 			
Please give details	N/A			
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	 ☑ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary ☐ Site can demonstrate exceptional circumstances ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary ☐ Onsite Collective place to protect worker's health and safety 			
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A			
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No			
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☐ Yes ☑ No			

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7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

Based written policies and procedures, the discrimination issue regarding hiring, compensation, access to training, promotion, termination or retirement shall not be occurred in the workplace. The facility provided the equal compensation and benefit to all employees based on skills and working experiences no matter how different they were of race, social background, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation, etc. Discrimination policies and procedures has been established in workplace, so did in the employment contracts. No employee was required to do the testing of pregnancy, virginity and HIV.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Employee' personnel files, Employment contract, Payroll records, Pay slips, Leave records, etc.

Details:

- Document review
- Employee interview
- Management interview

Any	other	comr	nents:
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Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 33.33	%	Female: 66.67%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	None		
Is there any evidence of discrimination	☐ Hiring	□ Compensation	☐ Access to training
based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	□ Promotion	☐ Termination or retirement	No evidence of discrimination found
Please give details	N/A		
Professional Development			
What type of training and development are available for workers?	Skill development Tra training, Primary fire-fi training, Chemical har	ighting training, First	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes □ No		

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8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

Work performed was on the basis of recognized employment relationship established through national law and practice. The facility provided the written labour contract for employees in native language that understood by employees. Both facility and employees keep one copy of signed labour contracts. All production employees we're directly recruited by the facility. No security guard and no home employee was identified by auditor.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Employee' personnel files, Employment contract, etc.

Details:

- Document review
- Employee interview
- Management interview

Anv	other	comm	ents
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Nil

Responsible Recruitment			
All Workers			
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	✓ Terms & Conditions presented✓ Same as actual conditions	V	Understood by workers
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No		
Migrant Workers			

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

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

8A: Compliance Requirements

8.A.1 There should be no sub–contracting unless previously agreed with the main client.
8.A.2 Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and

record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
The facility did not use any sub-contractors for production processes. All production processes were operated by the audited facility. No homeworking was found onsite.
Evidence examined:
Factory policies and procedures, Factory rules and regulations, etc.
Details: - Document review - Employee interview - Management interview
Any other comments:
Nil

Summary of sub-contracting – if applicable		
Is there any sub-contracting at this site? ☐ Yes ☑ No		
Summary of homeworking – if applicable		
Is homeworking used at this site?	□ Yes	☑ No

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

9: Compliance Requirements

- 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined

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

Current Systems:

The facility management established written anti-harsh or inhumane treatment policies and procedures. It states that the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. The employees were treated with dignity and respect. Suggestion box was provided for employees.

Evidence examined:

Company policies and procedures, Company rules and regulations, Grievance records, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other comments:		
Nil	 	

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☑ Yes □ No	
	Please give details:	
	Through direct supervisors, management, suggestion box, telephone/fax, etc.	
If yes, are workers aware of these channels and have access? Please give details.	The facility management published communication channel to 3rd party regarding any violations of labour standards, H&S and any other grievances. Employees could freely communicate through direct supervisors, management, suggestion box, telephone/fax, etc.	
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box, Telephone, etc.	
Which of the following groups is there a grievance mechanism in place for?	☑ Worker	□ Communities
	□ Suppliers	□ Other
Please provide grievance mechanism details	Employees were aware of grievance mechanism process, suggestion box was acknowledged by employees as they were placed in the common area. The employees could share their comments with the facility management; drop to their comments/complains into suggestion box. Moreover, the facility management established written procedures to keep any grievance report on the grievance lodged; the history of solutions, investigation process and remediation taken.	

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Are there any open disputes?	☐ Yes ☑ No
	Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide	☑ Yes □ No
individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	Please give details:
Is there a published and transparent disciplinary procedure?	☑ Yes □ No
, p. 22222	Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes □ No
аностринан , ргососси. о .	Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for	□ Yes ☑ No
disciplinary purposes (see wages section)?	Please give details:

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

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

Employees were reserved with a legal right to work in the workplace. They were also validated by the supplier for their legal right to work by reviewing original documentation.

Evidence examined:

Company policies and procedures, Company rules and regulations, Employee' personnel files, Employment contract, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other comments:

Nil

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

10B2: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

The facility established the policies and procedures regarding the environment management. All wastes were properly segregated and store in restrict area and entry is limited to authorize personnel only.

Evidence examined:

Factory policies and procedures, Factory rules and regulations, Environment Policy, etc.

Details:

- Document review
- Employee interview
- Management interview

Any other comments:

Nil

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Attachments



Wielding Section.JPG



Raw Material Storage Area.JPG



Wielding and Filling Section.JPG



Suggestion box.JPG



PPE Signage.JPG



Smoke Detector.JPG



Polishing.JPG



Plating Section.JPG



Wire Knitting.JPG



Fire Alarm.JPG



Put Stone Ferido Section.JPG



Assembly Point.JPG

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Fire Hose.JPG



Facility Signage.JPG



Onsite Clinic.JPG



Patient Bed.JPG



Finished Goods Storage & Loading Area.JPG



Finger Scanning System.JPG

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Locker Area.JPG



Parking Area.JPG



Final Packing Area.JPG



Eye Wash Station.JPG



Fire Extinguisher.JPG



Water Treatment Plant.JPG



Drinking Water.JPG



Fire Exit.JPG



Emergency Light.JPG



First Aid Box.JPG



Emergency Light Testing.JPG



Fire Alarm Control Panel.JPG



General Waste Storage Area.JPG



MSDS Posted.JPG



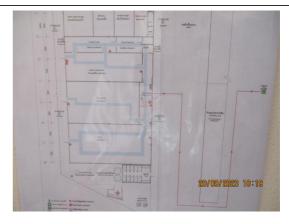
Emergency Stoppage.JPG



Hazardous Waste Storage Area.JPG



Canteen Area.JPG



Evacuation Map.JPG



Electrical Panel.JPG



Chemical Storage Area.JPG



Eye Wash Station Testing.JPG



Fire Pump.JPG



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

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