

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 rerecord actions taken and to categorise the status of the non-compliances.

Version 6.1

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).

Report reference: ZAA600075346

Start Date: E

2024-07-03

End Date: 2024-07-04

		Audit I	Details				
Sedex Company Reference: (only available on Sedex System)	ZC403492626		Sedex Site Re (only available of	eference: n Sedex System)	ZS407	ZS407301560	
Business name (Company name):	Elegant Knitting Int	ernatic	onal (Pvt) Ltd				
Site name:	Elegant Knitting Int	ernatio	nal (Biyagam	a site)			
Site address:	03B BEPZ Biyagama 11672 LK				LK		
Site contact and job title:	Ms. Jacinta Holmick	/ Gene	eral Manager				
Site phone:					jacinta.holmick@gmail.c om		
SMETA Audit Pillars:	☑ Labour Standards		Health and Safety (plus Environment 2-Pillar)	Environ 4-pillar	ment	Business Ethics	
Date of Audit:	2024-07-03						
	Aud	it Comp	any Name:				
		SGS Sr	i I anka		•		

		00001	Lama		
		Audit Con	ducted By		
Affiliate Audit Company	\searrow	Purchaser		Retailer	
Brand owner		NGO		Trade Union	
Multi- stakeholder			Combined Audit ((select all that app	ly)

Audit Parameters					
Time in and time out	Day 1		Day 2		
	In	08:40	In	08:40	
	Out	16:45	Out	14:35	
Audit type:	PERIOD	IC			
Was the audit announced?	SEMI_A	NNOUNC	ED		
Was the Sedex SAQ available for review?	Yes				
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No				
Who signed and agreed CAPR	Ms. Jacii	nta Holm	ick / Gen	eral Mana	ger
Is further information available	No				

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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	No union available in this	facility			
Reason for absence during the audit	No union available in this facility				
Reason for absence at the closing meeting	No union available in this	facility			

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Summary of Findings

Issue	Area of Non–Conformity		Number of issues		ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
5 - Living wages are paid			0	0	5	GE - ZAF600540222 GE - ZAF600540223 GE - ZAF600540224 GE - ZAF600540225 GE - ZAF600540226

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Corrective Action Plan - Good Examples

	Good Example		
[Back to findings			
	Good Example		
Status	OPEN		
Reference	ZAF600540222		
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?	☑ New ☐ Carried Over		
Explanation to the good example	Factory provides free breakfast, dinner, tea/ snacks and lunch at subsidized rate for all employees		
Evidence	Management and Employee interview, Document review		

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	Good Example	Evidence
[Back to findings	s summary]	
	Good Example	
Status	OPEN	
Reference	ZAF600540223	
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?	☑ New ☐ Carried Over	
Explanation to the good example	Factory provides free transport facilities for employees.	
Evidence	Management and Employee interview, Document review	

	Good Example	Evidence
[Back to findings	summary]	
	Good Example	
Status	OPEN	1
Reference	ZAF600540224	
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?	✓ New ☐ Carried Over	
Explanation to the good example	Factory provides free medical facilities for employees.	
Evidence	Management and Employee interview, Document review, Factory tour	
	12.12.1, 12.12.1, 10.4.	1

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	Good Example	Evidence
[Back to finding	s summary]	
	Good Example	
Status	OPEN	
Reference	ZAF600540225	
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?	☑ New ☐ Carried Over	
Explanation to the good example	Factory offers annual bonus for the workers.	
Evidence	Management and Employee interview, Document review,	

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	Good Example	Evidence
[Back to findings	s summary]	
	Good Example	
Status	OPEN	
Reference	ZAF600540226	
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?	☑ New ☐ Carried Over	
Explanation to the good example	Factory provides free uniforms for all employees	
Evidence	Management and Employee interview, Factory tour	

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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:	Dhananji Jayasinghe	APSCA Number:	21704192			
Additional Auditors:	Dilini Rajendra		21703449			
Date of declaration:	2024-07-04					

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:	Ms. Jacinta Holmick			
Title:	General Manager			
Date of declaration:	2024-07-04			

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

None

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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 reoccurring.

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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For more information visit: <a>Sedexglobal.com

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

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

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

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

Click here for Supplier (B) members:

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

Click here for Auditors:

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

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