



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC403492626	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS407301560	
Business name (Company name):	Elegant Knitting International (Pvt) Ltd			
Site name:	Elegant Knitting International (Biyagama site)			
Site address:	03B BEPZ Biyagama 11672 LK	Country:	LK	
Site contact and job title:	Ms. Jacinta Holmick / General Manager			
Site phone:	0771594650	Site e-mail:	jacinta.holmick@gmail.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-07-03			

Audit Company Name:
SGS Sri Lanka

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

Audit 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:	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:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>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).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
None	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
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			0	0	0	
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	5	GE - ZAF600540222 GE - ZAF600540223 GE - ZAF600540224 GE - ZAF600540225 GE - ZAF600540226
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	

Site Details

Site Details			
Company Name	Elegant Knitting International (Pvt) Ltd		
Site Name	Elegant Knitting International (Biyagama site)		
GPS location (if available)	GPS Address:	EPZ, Biyagama, Sri Lanka	
	Coordinates:	Latitude: 6.959218 / Longitude: 80.007767	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business Registration No: PV 126042/ BOI Registration on 28th March 2018 bearing registration no 5127/28/03/2018. / Factory re-registration: SH/GM/19/00092 -Valid till 10th July 2026 / Environment Protection Licence – Valid from 6th June 2024 to 5th June 2025		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of knitted sweaters		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Elegant Knitting International (Pvt) Ltd is located at No 3B, Biyagama Export Processing Zone, Biyagama, Malwana which is in the Western Province of Sri Lanka and about 24km far away from Colombo city. The factory is operating in this location since March 2019 and has been registered under Board of Investment of Sri Lanka. The main product category of the facility is manufacturing knitted sweaters for reputed brands in Australia & UK. The size of the total facility is 4912sqfts. Facility is under construction at the day of audit. They have obtained construction approval from Board of Investments on 10th August 2023. Factory is located in 1 building. Apart from the main building main Security point, locker room, canteen, male/ female wash rooms, chemical storage, maintenance workshop, boiler, compressor, waste water treatment plant and generator were located separately. Facility has provided dormitory facility for male workers. It is located at No 497/13, Pradeepagama, Walgama, Malwana which is nearly 2.5km away from the facility.		
Structure and number of buildings	Building Name:	Building 1	
	Floor	Description	Remark
	Ground Floor	Cutting, Trim Stores, Sewing, Linking, Embroidery, Iron Section, Washing, Sublimation, packing & Finished Goods Stores, HR office, Medical Centre	N/A
1st Floor	Yarn Stores, Sub-yarn stores, Shima Section, sample room Knit panel stores, Office area	N/A	

Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No visible structural integrity issues observed.
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has obtained building stability report on 2nd May 2019.
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	December to May
Process overview	Factory is specialized for manufacturing knitwear for well reputed foreign customers. Production processes comprise handling raw material (Yarn and cut panels), Knitting, Cutting, Sewing, Linking, Ironing, Embroidery, Packing and Finished good handling. There are 3 blocks for knitting operation, 3 linking lines and 6 sewing lines. Main equipment used are Knitting machines, sewing machines, embroidery machines, linking machines, band knife, Straight knife cutting machines, Heat seal machines, Fusing machines, Factory uses compressor, boiler/ mini boilers and generator as support machines for production.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Facility has formed Worker Representative Committee (WRC)
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has provided dormitory facility for male workers. It is located at No 497/13, Pradeepagama, Walgama, Malwana which is nearly 2.5km away from the facility. 5% of the total work force is staying in dormitory.
Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

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:	PERIODIC			
Was the audit announced?	SEMI_ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Ms. Jacinta Holmick / General Manager			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No union available in this facility		
<i>Reason for absence during the audit</i>	No union available in this facility		
<i>Reason for absence at the closing meeting</i>	No union available in this facility		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	241	0	6	0	0	0	0	247
Worker numbers - female	320	0	5	0	0	0	0	325
Total	561	0	11	0	0	0	0	572
Number of Workers interviewed - male	16	0	2	0	0	0	0	18
Number of Workers interviewed - female	22	0	2	0	0	0	0	24
Total - interviewed sample size	38	0	4	0	0	0	0	42

Nationalities Structure	
Nationality of Management	Australian
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Sri Lankan approx %: 100%
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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: No other payment cycle

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No significant complaint rose during the interview session
What did the workers like the most about working at this site?	Workers were happy with the practices that are in place by the HR Department and the managements approach to their grievances. Workers are provided additional range of benefits, beyond legal requirement such as providing bonus annually, free meals/ medical facilities etc.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	They have positive attitude towards working hours and no any complaints.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

For the interview process the audit team selected various employees representing different departments including Worker Representative Committee members, agency workers, fire team members and first aid team members. All employees stated that the management is very good in dealing with employees' relations matters and they were happy about the present management style. They expressed that if there is any matter they can go to even top management of the factory. Interviewees were very much interested on the interviewing process and expressed their free thoughts to the interviewers

Attitude of worker's committee/union reps:

There were 5 representatives from Worker Representative Committee who were interviewed during the interview process and they were appointed through the members. The members expressed that the management gave their support to establish the Worker Representative Committee and to participate for the meetings. As expressed by them there are members from each section to represent the Worker Representative Committee and their responsibility is to bring the employee issues to the forum and discuss with the management and get proper solutions.

Attitude of managers:

Total audit process was a combination of factory tour, document/ payroll review and interviewing of employees, security & cleaning personal and the management. Factory management and the office staff supported to carry out audit activities and complete the audit successfully without any restriction. Auditors were allowed access to all area and required information.

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:

1. Facility has developed human rights policy and stakeholder impact assessment with the objective to ensure and respect the human rights of its supply chain and maintain compliance with relevant rules and applicable legal regulations.
2. Facility has clearly defined its responsibilities in the policy and as per that Human Resources Department is updating new information, training and Implementing and for monitoring. Same as HR Manager is responsible for training and implementing and monitoring the system.
3. The management was aware about the world's human rights aspects and the fundamental human rights accepted by the country through the constitution and they know about the ways they can adopt those human rights in the factory and how those can be protected through effective remediation.
4. To achieve the objectives of the policy the factory has set up the procedure as below:
 - Training on company's human rights expectations and the terms of this policy
 - To conduct reasonable human rights due diligence to determine the actual and potential human rights and seek to employ reasonable measures to mitigate any such incidents
 - Develop procedures and mechanisms that specify how known or suspected human rights violations should be reported by its supply chain and how such reports are to be investigated
 - Track and monitor reports of human rights violations related to the company's operations to identify potential control failures and for other purposes
 - Adhere to the requirements of the voluntary principles on security and human rights in its dealings with private and public security providers, local communities and potential victims of human rights violations
 - For relevant security service providers, the company will perform reasonable due diligence, require that human rights terms and conditions be included in contracts, and require periodic human rights reporting and certifications
5. Facility has identified the confidential reporting of human rights violations under human rights policy and further current suggestion/ complaint reporting system can also support for reporting human rights violations which include; open door policy, suggestion box

Evidence examined:

1. Documents review (Policies & procedures) 2. Management interviews 3. Employee interviews
Any other comments:
None

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has established a policy including the company commitments and responsibilities
Are the policies included in workers' manuals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No worker manual provided. Policies are taught during the induction programme.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Chaminda Vithanage - HR Manager
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has identified the confidential reporting of human rights violations under human rights policy and further current suggestion/ complaint reporting system can also support for reporting human rights violations which include; open door policy, suggestion box
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the personnel those who dealing with employee's personal details, business secrets and other supplier information are required to keep the confidentiality of the information they are handling. Misuse of such information is a punishable offence. Furthermore, facility identified the confidential reporting of human rights violations under human rights policy Further under grievance handling policy the company has defined the confidential reporting and securing the date/ information given by employees All workers related information are handled by HR Department and for recording personal related information of employees the HR Department maintain individual personal files. To secure personal salary details the company provided individual pay slip to employees

Measuring Workplace Impact		
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year	6.0%
	This year	6.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	6.0%	
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year	5.0%
	This year	5.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	5.0%	
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility records all minor & major accidents. There is general register to record major accidents and a separate log for minor accidents	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	3.8%
	This year	3.5%
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)	3.0%	
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	1.0%
	This year	1.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

OB - Management Systems and code Implementation
[Summary of Findings]

OB: 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:

1. There are well defined and written company social compliance policies and procedures to achieve social compliance requirement. Manager HR is the prime responsible person for the implementation and maintenance of social compliance standards in the facility. During the audit, selected personnel in the management team were interviewed and asked few questions to ensure that they are updated with local law and other clients' requirements in social compliance.
2. Facility management is aware of the management system and implementation. There are well defined company policies and procedures to implement social compliance objectives. All the applicable local law updated are available with the facility.
3. Facility is registered its business under The Companies Act No 07 of 2007 and has a valid agreement with Board of Investment as per the BOI Law.
4. Factory tracks worker turnover, absenteeism & employee grievances to track the employee satisfaction.
5. There is an internal auditing system to identify the gap between required compliance levels with the existing status. All the audit findings are discussed and take corrective actions/ preventive actions accordingly.
6. Facility has taken required measures to provide awareness to all third- party personnel those who are working in the factory. There is third party security service and cleaning providers in the facility and those workers have also been given the access to the information. At the stage of entering to the service agreement service providers agreed to maintain the customer's interest on social compliance. Company has communicated their contractor about the code of conduct of the facility.
7. During the day of audit, the auditors did not observe any evidence that the site has been charged for any non-conformance against local regulations.

Evidence examined:

1. Management interviews
2. Workers interviews
3. Document review (Policies & procedures , internal audit reports , social compliance training records)

Any other comments:

None

Management Systems

<p>In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has not subjected to any fines from the government authorities.</p>
<p>Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility management has established policies and procedure over social compliance codes such as child labour, forced labour, discrimination, anti-harassment/anti-abuse. It clearly mentioned what objectives they intended to achieve by implementing these policies. Policies were observed that complying with local law and the ETI requirements. There is a designated responsible person in the facility to implement the policy. Procedures are also developed by the company to ensure that these policies are running effective at the work place</p>
<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>During the management interview, employee interview and documents review, it was noted that factory has provided training based on ETI base codes for effective implementation. No signs of forced labour, child labour, discrimination, harassment & abuse observed. Hence facility have effectively implemented those policies.</p>
<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Employees and Managers are given awareness on social compliance codes under the induction program and annual trainings</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>During the management interview, employee interview and documents review, observed that they have effectively delivered the training programs to entire workforce. Interviewed personnel demonstrated their awareness on these policies.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>OEKO-TEX Standard 100 - Valid till 28th February 2025 /Global Organic Textile Standard (GOTS) - Valid till 19th December 2024</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>There is a HR Department in the facility under the supervision of HR Manager. There is HR team to handle HR related functions.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Mr. Chaminda Vithanage - HR Manager</p>

<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Noted during the documents review. Especially the grievance handling procedure describes the confidentiality of information of employees and factory has mentioned the information security of human rights related information under human rights policy.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Noted during the document review, employee interviews and management interviews. Factory maintain separate personal files to maintain personal record including disciplinary records, salary increment information etc.</p> <p>Grievance records are separately maintained by HR Department.</p>
<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Based on the updated risk in HR and Labour and Health & Safety the factory evaluated its policies and procedures. For example, as per the new human rights and land rights requirements the factory has developed policies.</p>
<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory takes relevant administrative and engineering controls</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has a separate company code of conduct which respects the labour standards which are aligned with local law and international laws and regulations and the supplier standards also should align their systems accordingly.</p>
<p>Land Rights</p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory is registered its business under The Companies Act No 07 of 2007 and has a valid agreement with BOI as per the BOI Law.</p>

<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory established in BOI zone. However, as per the Land Rights Policy the following legal due diligence process is follow by the factory;</p> <p>The Factory should be registered in accordance with the provisions of the Factories Ordinance and regulations to carry out operations.</p> <p>The date of establishing the Factory shall be the date on which any of the actual operations of the factory or any of the actual operations is commenced.</p> <p>An approved building plan should be used for the construction of the Factory premises.</p> <p>Notice of intention in relation to the Factory and the premises should be provided.</p> <p>All provisions in the Factories Ordinance should be followed in the construction/ setting up/operations of a factory.</p> <p>All provisions in the guidelines such as building requirements, sanitation requirements, facilities for workers, pollution control, fire precautions, lightening protection for Factory Buildings should be complied with for the purposes of establishing Factory Buildings</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Facility has developed a Land Rights Policy and the due diligence process is defined as mentioned in the previous question.</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory established in BOI zone.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Upon the need of the factory, there are opportunities for relocating the business from the existing land to another location</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No such evidence noticed</p>

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:

1. Company has defined their policy for no forced employment. Accordingly, the company has committed not to restrict their freedom in an unnecessary manner and by letting workers to choose their profession and ensure employment rights at the workplace.
2. Facility has communicated their policy to all the supervisors and managers regarding this and policies are displayed for the awareness of everyone. Facility prohibits all forms of coercing employees and unnecessarily limiting of employees' freedom of movement. Factory management respects the local and international laws regarding this principle.
3. Employees are recruited to the factory upon their request through a job by an application form. Nobody is working in the factory against their will.
4. The employment contract complies with local laws and no force labour statement included in the contract.
5. Workers can leave the factory after working hours and overtime is voluntary. If overtime/ extended hours worked the factory pre- inform it and gets employee consents. Factory does not practice pay cut or punishing upon refusal of work overtime.
6. No unauthorised deductions are made from the workers' salary except statutory deductions (8% of the salary for Employees provident fund).
7. Personal protective equipment are given to workers at free of charge.
8. Employment termination can be happened on resignation and termination and it can be on the disciplinary ground or vacation of the post. Verified and confirmed that employees are free to leave from the factory after giving reasonable notice of one-month period.
9. There is no local legal requirement to withhold the employee's personal certificates / national identity cards etc. Noted during the employee interviews that the employees are working at the facility voluntarily and the factory had not withheld any amount of money or original certificates. (E.g.: Educational certificate, Birth certificate). All the copies are available for personal records.
10. The factory does not use the prison or bonded labours. Confirmed through the workers and management interviewed.
11. Verified and found that both the employer and employee have signed contracts letters. And the original copy is given to the employee and a copy is maintained by the factory. Observed these documents are in local language and worker can understand it.
12. No physical or verbal abuse identified, confirmed through the employee interviews.
13. Factory security service is only for the safeguard of employees and properties of the factory. They were not involved in restricting employee's free movement. Confirmed during the worker interviews, management interviews, security personnel interviews and security agreement reviewed.
14. During the period of audit, not observed any evidences on bonded labour or trafficked labour.

Evidence examined:
1. Company policy statement on forced labour 2. Recruitment policy and staffing procedure 3. Contract letter to check notice period 4. Application form (to check whether the applicant request for an employment) 5. Personal files to check bond or agreement which force compulsory employment and check employee's original certificates, identification papers. 6. Pay records of the workers. 7. Worker interview 8. Security personnel interview
Any other comments:
None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: It was noted that employees are free to end their employment voluntarily.
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details: There is no any part of the business based in UK on this company and the company only dealing with UK brands.
Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: It was noted that employees can leave the workplace voluntarily after ending the work for day.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: No such evidence found during the audit & factory management confirm the same. Factory has communicated their policies regarding forced labour to their supply chain & has taken their commitment on adhering to the policies. Also, via internal audit system factory monitor their suppliers to avoid such circumstances.

<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Factory has established policies, procedures and system to align these requirements and factory has a thorough internal monitoring system when recruiting employees as well as during the work.</p> <p>Getting employment in the factory is free of charge as factory directly recruit without using labour suppliers and factory issues valid contract letter by defining all terms and conditions of employment. Therefore, no such incident faced yet. Confirmed by employee interviews, management interviews, documents review and factory tour.</p>
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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:

- 1. Company has established a policy for freedom of association and collective bargaining. Verified and found that the facility recognizes and respects the rights of employees to exercise their lawful rights of freedom of association.
- 2. There is no trade union in the facility and there is no local law to have a union, but there is a committee called "worker representative committee (WRC)" in the facility as an alternate means of trade union.
- 3. WRC members elected by employees and no any intervention from management. Observed and confirmed through worker interviews and documents review, all the representatives have been elected unanimously. During the interviews had with the workers they confirmed that they are aware about the representatives assign for them.
- 4. Verified and confirmed through records review and interview process that the facility does not discriminate any worker representatives upon their membership in the WRC and participating such activities relating to the worker representative committee (WRC).
- 5. The factory provides time for worker representative committee (WRC) members to discuss their matters without any financial penalty.
- 6. There is a suggestion box to communicate their complaints and suggestions and workers can put their suggestions in confidential manner.
- 7. Factory has a grievance handling procedure and any also workers can complain their issues to the management directly. According to the grievances handling procedure, employee can produce their concerns to his/her immediate supervisor. If he/she is not given a solution, then can communicate to top layers.
- 8. During past recent there was no any strike or worker unrest situation observed.

Evidence examined:

- 1. Company policy statement on Freedom of Association and Collective Bargaining
- 2. worker representative committee (WRC) meeting minutes.
- 3. Worker interviews (including workers' representatives)
- 4. Management interviews

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Other <input type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Facility has formed "worker representative committee (WRC)
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility has open door policy to raise grievances and suggestions to the upper layers of the company. The factory has provided grievance/ suggestion boxes and there is a HR Department representative for handle employee concerns/ issues.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has allowed employees to elect their employees and have provided separate time within the business/ working hours
Name of union and union representative, if applicable:	No union available
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	worker representative committee (WRC)
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Each worker knows the representative of their section. This information is given to the workers during the induction session
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2024-03-25
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	5.0

<p>Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>All employees are aware about worker representative committee (WRC) as a good mechanism for solving their problems. They produce their problems and concerns to their sectional representatives to submit in the meeting. Employee representatives meet factory management and discuss their problems. Meeting minutes are available in the factory. During the documents review, it was noted the worker representative committee (WRC) representatives have produced their problems to the management and management has responded to those matters and the representative have shared those with the respective employees. Last meeting date was on 5th June 2024 and have discussed about Transport related matters , salary increments , Requesting holiday for Poson poya etc.</p>
<p>Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

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

3: 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:

1. Company has clearly defined their health and safety policy and procedures.
2. Factory has developed health and safety risk assessment covering actual and potential risk of their operations and developed risk matrix based on severity and likelihood (probability).
3. Housekeeping status of the factory was observed well maintained on the day of audit. No waste materials were kept inside the factory and there is a designated location to drop waste materials.
4. The factory has a Workman Compensation policy to compensate employees in any accidents or in an emergency. Also, they have insured factory properties from a third-party insurance company Both policies are valid current period.
5. There are Boilers, air receivers, steam receivers and Hoist in the company. Facility has obtained inspection certificates for that equipment's. All the inspections have been performed within the legally required period. All inspection certificates are valid till 12th March 2025
6. Factory has displayed warning signs and posters in required areas to educate employees on safety.
7. Verified that all fire extinguishers installed in the factory have been inspected and renewed for the current period by an authorised body. There are adequate no of fire call points in the factory to operate in case of an emergency and different types of fire extinguishers. In addition Facility has installed smoke detectors.
8. Observed all the sections / work rooms are well sufficient to the workers being worked. These work areas have been provided with emergency exits. The emergency lights placed in buildings are inspected periodically by internal maintenance team in the factory. There is a designated assembly point in the factory to gather in case of an emergency.
9. The factory has a trained fire-fighting team and they have conducted the last fire demonstration on 19th June 2024. Facility has trained 17 employees as fire fighters.
10. The factory has conducted fire evacuation drills for employees in the factory and Hostel. They have proper understanding on evacuation in an emergency as confirmed through worker interviews. Last day fire drill has been conducted for facility on 19th June 2024 (evacuation time 240 seconds) & Last night fire drill has been conducted on the same day – 19th June 2024 (evacuation time 90 seconds).
11. Last day fire drill has been conducted for Hostel on 19th June 2024 (evacuation time 60 seconds) & Last night fire drill has been conducted on the same day – 19th June 2024 (evacuation time 50 seconds).
12. There is a rest room with trained first aiders and there are first aid boxes placed at different locations in the factory and employees can easily access to them.
13. Factory conducts first aid training program for the workers annually. Last training was done on 13th May 2024. Facility has trained 30 employees as first aiders. Training has been conducted by SL red cross society
14. Confirmed through the factory tour that the canteen area was clean and hygienic during the day of audit.
15. Factory has provided Personal Protective Equipment (PPE) for the employees at free of charge.
16. Factory has obtained drinking water certificate for its physical, chemical and microbiological parameters. Last test report obtained on 17th April 2024 for factory and Hostel. The parameters are compiled there.
17. It was noted during male hostel visit; the premises complying with health & safety requirement and maintain in hygienic manner. Also verified the applicable documents are available for the current period.

Evidence examined:

<p>1.Management interview 2.Workers interview 3.Factory tour 4.Documents review (Health & safety trainings, pressure vessel inspection records, health & safety test reports , insurance policies)</p>
<p>Any other comments:</p>
<p>None</p>

<p>Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has established its health and safety policy and procedures and displayed those. Employees are given awareness by induction and others specific health and safety training</p>
<p>Are the policies included in workers' manuals?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No worker manual provided.All the policies and other social compliance requirements are taught/ explained in induction training and displayed in compliance notice board</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Facility is under construction as of audit date & they have obtained construction approved from Board of Investments on 10th August 2023</p>
<p>Are visitors to the site informed on H&S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: When visitors are entering to the facility the security guard provides the basic emergency rules in the factory and then the respective officers of the factory are responsible of providing required personal protective equipment to their visitors</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The size of the rest room is well enough to treatment and resting facilities of employees. The resting beds are separated gender wise.</p>
<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has 2 nurses and qualified first aid team covering all shifts.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory provides transport facility. Factory conduct random inspections to ensure the transports are fit for purpose, and in safe condition and the providers are maintained the proper conditions on it and available valid licence.</p>

<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has provided lockers to fulfil its requirement which comply with gender ratio</p>
<p>Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has developed health and safety risk assessment covering actual and potential risk of their operations and developed risk matrix based on severity and likelihood (probability)</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has obtained the Environmental Protection License for the current period & it is valid till 5th June 2025</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory does not use banned chemicals.</p>

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:

- 1. Company has established policies and procedures to prevent child labour and employment of young personnel.
- 2. As per the local law the person who has not completed the age of 16 cannot be employed in a business or factory. Factory recruits' persons 18 years & above.
- 3. Verified that the facility properly checks the applicant's age through the valid documents such as Birth Certificate, National Identity Card, School leaving certificates and Village Headmen Certificate.
- 4. During the recruitment, the factory deeply interviews employees to verify their age.
- 5. There is no evidence that children are employed in the facility.
- 6. Confirmed through reviewing of last 12 months hiring and termination records that there was no any pattern that child workers were employed.
- 7. Also, noted that each personal file is equipped with age verification documents such as copy of birth certificate or national identity card.
- 8. Reviewed the facility's communications made to all facility employees regarding child labour policies, procedures and communication has been addressed on each of the following facility requirements:
 - a. Obtain proof of age documentation from all potential workers prior to hiring.
 - b. Critically examine the authenticity of age documentation.
 - c. Question the authenticity of age documentation not conforming to facility practices.
 - d. Age documentation retained in employee personnel files.
 - e. Interviews with all prospective employees.

Evidence examined:

- 1. Company policy on child labour
- 2. Recruitment policy and procedure
- 3. Personal files of factory employees to check age proof documents.
- 4. Management interview
- 5. Worker interview

Any other comments:

None

Legal age of employment:	16
Age of youngest worker found:	18
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No young workers available

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:

1. Company has established policy and procedures for wages and benefits they offer to the factory personnel.
2. Company HR department takes the overall responsibility to attendance processing of the factory. Salary processing and all the related processes are running at the factory itself. There is a well-defined salary structure in the company. Persons, who recruited to the company, are fixing according to that salary structure. Wage preparation is done by the HR department.
3. Company management is well understood about legal minimum wages regulations stipulated by the government. Factory's minimum salary is LKR 25,500.00 per month while exceeding the local regulation of LKR 16,000.00 per month/LKR 640.00 (per day) As per the National Minimum Wage of Workers (Amendment) Act.No.16 of 2021 the minimum wage should be LKR 12,500.00 (per month) / LKR 500.00 (per day). In addition to that the budgetary relief allowance should be LKR 3,500.00 (per month) / LKR 140.00 (per day) as per the "Workers' Budgetary Relief Allowance Act no 04 of 2016 and Budgetary Relief Allowance (BRA) of workers Act, No 36 of 2005. Therefore, altogether the minimum wages should be altogether LKR 16,000.00 (per month)/ LKR 640.00 (per day).
4. Detailed contract letters in given to every employee stating their basic salary and any other allowances entitled to them.
5. Wages are paid directly on time. Salaries paid as bank deposits to the representative employees by the date salary is paid.
6. Pay sheets are given to all employees in local language & they can understand it. All the understandable information of the salary is shown in the pay sheet. Here it includes their basic salary, number of days worked, payments added to the salary (allowances, incentives, and attendance payments), number of overtime hours worked, gross salary earned, deductions made from the salary and final payment made to the worker.
7. Worker's basic wages are complied with local legal minimum wages of the industry. Over time work was also compensated for entire hours they worked. Wage records are well maintained by the factory not less than four years as mandated by the local law.
8. Verified through workers interviewed that wages are not withheld as a deposit for any reason.
9. The factory had displayed wage and overtime calculation methods on noticed board and workers were educated on wage calculations methods such as overtime calculations and holiday payments calculations.
10. The factory properly maintains the employees' wage records. Confirmed through the document reviewed.

Note: Facility has obtained 5 day work week approval from the department of labour. It is valid from 1st January 2024 to 31st December 2024

Evidence examined:

1. Company policy on wages and payments
2. Company salary structure
3. Employee's attendance sheets and respective payslips.
4. Company disciplinary policy and procedure
5. Employee contract letters
6. Interview with management
7. Interview with workers

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?

Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 9.0 Per Week: 45.0 Per Month: null	Actual Per Day: 9.0 Per Week: 45.0 Per Month: 180.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 3.0 Per Week: 15.0 Per Month: 60.0	NO
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: 640 Per Week: null Per Month: 16000	Actual Per Day: null Per Week: null Per Month: 25500	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: null Per Week: null Per Month: null	Actual Per Day: 1530 Per Week: null Per Month: null	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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 attendance and payroll records were checked for May 2024 (Recent month), January 2024 (Peak month) & October 2023 (Non peak month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No According to wages board salary are graded according to designations and experience.		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	LKR 25,500.00 per month		
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: Facility provides annual bonus 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:	8% for Employee's Provident Fund (EPF) from worker's salary (for deduction basic salary, Budgetary relief allowance, holiday payments and fixed allowances are considered)		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Please list all deductions that have been made.	1. EPF 8% 2. No pay Deduction 3. Welfare deduction		

Please list all deductions that have not been made.	None
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All hours including overtime hours have been paid correctly. Verified by reviewing all records
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.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> 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).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Periodically company review the employee's salaries to decide their salary increments.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the unskilled male and female workers are recruited for the same wage on same job and then increments are based on their skill, performance and efficiency.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Good Example		Evidence
[Back to findings summary]		
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?	<input checked="" type="checkbox"/> New <input type="checkbox"/> 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	

Good Example		Evidence
[Back to findings 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?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Explanation to the good example	Factory provides free transport facilities for employees.	
Evidence	Management and Employee interview, Document review	

Good Example		Evidence																		
<p>[Back to findings summary]</p> <table border="1"> <thead> <tr> <th colspan="2">Good Example</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600540224</td> </tr> <tr> <td>Clause</td> <td>5 - Living Wages are Paid</td> </tr> <tr> <td>Issue Title</td> <td>429 - Company provides a range of additional benefits, including: free medical care on-site, holiday and other bonuses, free library, food subsidy, free transport</td> </tr> <tr> <td>Subcategory</td> <td>Benefits & Insurance</td> </tr> <tr> <td>New or carried over?</td> <td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td> </tr> <tr> <td>Explanation to the good example</td> <td>Factory provides free medical facilities for employees.</td> </tr> <tr> <td>Evidence</td> <td>Management and Employee interview, Document review, Factory tour</td> </tr> </tbody> </table>		Good Example		Status	OPEN	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?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	Factory provides free medical facilities for employees.	Evidence	Management and Employee interview, Document review, Factory tour	
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Subcategory	Benefits & Insurance																			
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Explanation to the good example	Factory provides free uniforms for all employees																			
Evidence	Management and Employee interview, Factory tour																			

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.
- 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:

- 1. Company has established its working hour policy and displayed at the canteen premise for all to see. Also, factory is aware about the Sri Lankan legal requirements on working hours and its limitations.
- 2. According to the local law, there are no working hour restrictions for male workers. As per the law, female and young workers shall not work more than 12 hours per day, 60 hours per week, female employees shall not exceed 60 over time hours per month and young workers shall not exceed 50 over time hours per month. Factory work week is 45.00 hours of regular work for shift pattern which comply with local law and ETI base code.
- 3. Number of hours (or minutes) worked will be considered as over time and over time work will be performed only if the employee willing to work late hours.
- 4. Each employee is informed the hours they have to work during the recruitment stage. Appointment letter mention factory start time and off time and number of hours they have to complete the work day and work week; weekly holiday entitled to the employee and leave entitlement to the employee.
- 5. Factory is running at a production plan which is prepared before starts particular time period. According to the production plan, they project number of hours they supposed to work each day, week and month. These projections were observed not violate the country law and ETI requirements.
- 6. Factory maintains a finger scanning attendance system to record employee's attendance. Each employee needs to scan their fingers to mark their attendance (in and out time) when they enter and leave the factory.
- 7. Factory maintains the employees time attendance records for more than four years as requested by the local law.
- 8. Factory maintains employees' wage records more than one year.
- 9. Pregnant mothers are not allowed to do over time work as restricted by local law. Also observed no feeding mothers are employing on overtime work.

Evidence examined:

1. Company policy on working hours 2. Time attendance records of sample workers 3. Over time records 4. Management interviews 5. Worker interviews
Any other comments:
None

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Finger scanning system
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
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.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	3 hours per day in October 2023, January 2024 & May 2024 15 hours per week in January 2024 & May 2024 60 hours per month in January 2024

Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No combined hours over 60 found
Approximate percentage of total workers on highest overtime hours:	5.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Worker agreement mentioned that overtime is voluntary & same was confirmed during worker interviews
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A - there is no legal requirement to OT premium Please give details: 150%
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% workers are paid at a 150% premium rate and the payments are being made with the wages once a month.
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.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	100% workers are paid at a 150% premium rate and the payments are being made with the wages once a month.
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)	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	No combined hours over 60 found
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not Applicable
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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:

- 1.Factory has developed discrimination policy and the practiced have been aligned to the policy.
- 2.The hiring procedure of the facility and advertisement used for hiring do not violate this principle.
- 3.Also, it was confirmed during the employee interviews that the factory does not treat workers in a discriminate manner. Per the factory hiring and promotional procedure the workers have equal opportunity for employment and the promotion. Employee grading is based on employee skills and experience.
- 4.The factory management respects human rights as confirmed by the management interviewed.
- 5.When reviewing documents, and interviewing the employees confirmed that the facility does not consider the applicant's ethnic, social group, gender, cast and positioning when hiring employees.
- 6.The factory does not do any pregnancy or blood testing before the recruitment as confirmed by the workers during the worker interviews.
- 7.The workers can complain any matter directly to the management as confirmed through the worker interviews.
- 8.The facility has not experienced any matter related to discrimination over the last one year as verified through the employee interviews.

Evidence examined:

- 1.Company policy on discrimination
- 2.Recruitment policy
- 3.Management interviews
- 4.Worker interviews

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 66.0%	Female: 34.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	7	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found

Please give details	Not Applicable
Professional Development	
What type of training and development are available for workers?	All new comers are trained on the job training. Apart from that the employees are given subject specific training in compliance
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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:

1.All the workers of the factory are recruited to the factory through formal and recognized employment procedures.

2.Verified through the employee interviews that every employee has the original contract letter and they are aware about the employment conditions given in the contract letter. HR department representative explains all the statement in details to all employees at the time of signing the contract letter. Confirmed through employees interviewed. Each personal file is equipped with the contract letters.

3.Also, noted that the factory had provided individual letter of contract for each employee with job descriptions. Factory has given confirmation letters for employees those who have successfully completed the probation period.

4.As per the local law, foreign workers are not allowed to work in a factory. Permissions are given for foreign employees only for technical related duties. If factory wants to have foreign staff to their operations, they are required to have prior approval from Board of Investment, State Administration Ministry of Sri Lanka and Ministry of Defense of Sri Lanka for visa. No migrant workers in this facility. Confirmed through the factory tour, documents review, and employee interviewed.

5.Factory has outsourced its security and cleaning functions to outside third-party registered agencies.

6.No workers' layoff system confirmed by the employee interviews. During the day of audit auditors checked the termination pattern of the factory for the past. Not observed any pattern of worker termination.

Evidence examined:

- 1.Company regulations
- 2.Hiring policies and procedures
- 3.Appointment letter
- 4.Employee interviews
- 5.Management interviews

Any other comments:

None

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?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions
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)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Migrant Workers	
Type of work undertaken by migrant workers:	No any migrant in worker category in this factory
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 (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No migrant workers available in this facility
Is there any observation on this finding?	No migrant workers available in this facility
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 4 migrants are occupied in this facility under managerial positions
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	2
Please provide the names of agencies if applicable	Security: Sitrek Security Solutions (Pvt) Ltd Cleaning- Lesil Maintenance
Were agency workers' age / pay / hours included within the scope of this audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has signed agreements with the agencies providing supporting services to the factory

<p>Does the site have a system for checking labour standards of agencies?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory conducts internal audits to check the terms and conditions of the agency workers deployed in the factory premises.</p>
<p>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.)</p>	
<p>Any contractors on site?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: No contractors available in this facility</p>
<p>Do all contractor workers understand their terms of employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: Not applicable as there is no contractors available in this facility</p>

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:

1.Facility has subcontracted dyeing process to approved subcontractor.
2.Factory has a system to monitor the subcontractor sites and records are maintained at the factory.
3.No home working operation in this facility.

Evidence examined:

1.Management interview
2.Documents review (Subcontractor policy, internal audits)
3.Workers interview
4.Factory tour

Any other comments:

None

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Process subcontracted	
Process Subcontracted	Dyeing
Name of factory	Isabella (Pvt) Ltd
Address	Ring Road 3, Phase II , EPZ, Katunayake, Sri Lanka
Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory declared about subcontracting & provided all working hours that workers have worked.
If sub-contractors are used, is there evidence this has been agreed with the main client? (If yes, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Subcontracting has been agreed with the main client.
Number of sub-contractors/agents used:	1
Is there a site policy on sub-contracting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Site has a policy on subcontracting in which sub-contractor's social compliance standards are stated as one of the main factors to be considered.
What checks are in place to ensure no child labour is being used and work is safe?	Internal audits

Summary of homeworking – if applicable

Is homeworking used at this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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:

1. Company has established their company policy on harassment and abuse. All the management and supervisory personnel are aware on this policy as confirmed by management interviews
2. There is defined disciplinary procedure in the factory. It describes accepted behaviour and what misconducts are. As well as they have clearly mentioned what sanctions shall be applied if misconduct is found.
3. It was noted that the factory does not practice any form of psychological or verbal harassment or abuse. No corporal punishments are applied on disciplinary measures. Confirmed through the employee interviews.
4. Verified that facility disciplinary actions and procedures are complied with the local laws and regulations.
5. Verified through the employees interviewed that the employees have understood about the disciplinary action.
6. Verified through the employee interviews and documents review that no complaints had made for the last one year about the inappropriate disciplinary action.
7. During the documents review (specially security SOPs, JDs), it was observed that there is no any clause which intimates' harassment on the factory workers

Evidence examined:

1. Company policy on harassment
2. Disciplinary policy and procedure
3. Management interview
4. Workers interview

Any other comments:

None

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory has displayed labour department contact number & client's hot line numbers on the factory notice board to report any grievances
If yes, are workers aware of these channels and have access? Please give details.	Workers were aware that they can do complain to department of labour and district factory engineer if they cannot get resolutions for any matter within the factory. But during interviews they mentioned that so far no such incident happened as management has responded to their grievances effectively

<p>If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>1.Factory has setup open door policy 2.Suggestions boxes are placed in different locations 3.WRC is available</p>
<p>Which of the following groups is there a grievance mechanism in place for?</p>	<p><input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other</p>
<p>Please provide grievance mechanism details</p>	<p>As explained above there are many grievance mechanisms for workers. For community if anyone has a concern against the factory, they can directly complaint to government authorities and the authorities will ask from the factory Suppliers' may even provide their concerns to the management. Most this may be related to operational matters as expressed by management</p>
<p>Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<p>Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>

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:

- 1.All the workers in the factory are Sri Lankan who are well eligible to work in garment manufacturing factory.
- 2.There are two migrant employees in Executive/Management category in the facility, all other employees are Sri Lankan citizens working in the factory. Confirmed through the factory tour, documents review and employee interviews. Factory has employed security & cleaning workers from a registered local firm.
- 3.Before the employment of such a third- party service provider in the factory, factory checks their legal status and business registration and availability of all the permission to carry out operations in that field.

Evidence examined:

- 1.Management interviews
- 2.Workers interviews
- 3.Third party worker interviews
- 4.Third party workers' personal files and wage records

Any other comments:

None

10B4 - Environment 4–Pillar
[Summary of Findings]

10B4: Compliance Requirements

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

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

10.B4.3 Businesses shall be aware of their end client’s environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

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

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

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

10B4: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- 1.The factory has a waste management system & generated solid wastes are segregated and collected by authorized bodies. Waste water is treated in internal waste water treatment pant & they send to BOI treatment plant.
- 2.No official complaints or legal recommendations found for the considered period & factory has obtained the environment protection licence from the central environment authority which is valid until 5th June 2025.
- 3.The factory has Environmental Policy and acknowledged by General Manager and policy found communicated to all workers. The policy covers all their environmental impacts. Also, factory has evaluated their impact and they are continuously recording and monitoring site's use and discharge of natural resources and waste.
- 4.Factory has designated person to coordinate activities to improve site's environmental performance.
- 5.Factory management maintain all the legal required environmental documents respect to regulatory requirements. All related documents and process improvement on environmental performance is managed by General Manager
- 6.The relevant documents for solid waste disposal consignment details and list are in place and available for review.
- 7.The appointed waste collectors found with valid license.
- 8.The factory conducts environmental noise monitoring assessment as per the regulatory requirement.
- 9.During the interview with management and documentation review it was noted that factory has not subject to any fine or noncompliance to environmental regulations.

Evidence examined:

- 1.Environmental policy.
2. Energy and water bills.
3. Factory visit.
- 4.Environmental Aspect and Impact Register
5. Training records.
6. Management interview.
7. Workers interviews.
8. Annual monitoring report for waste and energy use

Any other comments:

None

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	Ms. Jacinta Holmick- General Manager
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environment aspect evaluation has been conducted with considering all the process and identified significant aspect. Last review done on 24th April 2024.All the identified significant aspects controlled by operation control procedures. It helps to reduce the risk.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Facility follow ISO 14001 guideline

Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All the environment objectives derived from environment policy, time to time measure the status and significant improvement is there to reduction the pollution from all the operations. Further separate operational control procedures established for control identified significant aspects and other significant operations.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: None
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: EPL (Environmental protection licence- Valid till 5th June 2025
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Chemical inventory is maintained
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Client requirements are managed
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Resource used identified as a significant aspect, objectives identified to limit consumption for water, waste, energy etc.
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Part of the Solid waste (Metal , Cardboard, waste yarn) directed for process of recycling
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Factory maintain inventory on consumption water, energy etc.

Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No any agencies or subcontractors operating within the premises.	
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	1800000	2050000
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Local Authority	Local Authority
Water Volume Used	9376	10649
Water Discharged	BOI treatment plant	BOI treatment plant
Water Volume Discharged	7500	8520
Water Volume Recycled	0	0
Total waste produced	Not recorded	Not recorded
Total hazardous waste produced	Not recorded	Not recorded
Waste to recycling	Cardboard 31509Kg,Cotton 23006Kg, Metal 2698Kg	Cardboard 35150Kg,Cotton 36100Kg, Metal 3500Kg
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	530044pcs	590000pcs

10C - Business Ethics – 4-Pillar Audit
[Summary of Findings]

10C: Compliance Requirements
 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.
 10C: Guidance for Observations
 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current Systems:

- 1.Factory has business ethics policy addressing their policies regarding bribery corruption and Unethical Business practices. This policy has been communicated to all the employees and suppliers.
- 2.Factory has given special awareness and training regarding business ethics to the employees whose job role is in high risk. Example: raw material stores, finished good stores, purchasing etc.
- 3.Factory has a designated person who is responsible for implementing standard regarding Business ethics.
- 4.Factory has a system of confidential reporting and dealing with unethical business ethics.

Evidence examined:

- 1.Anti-bribery policy
- 2.Business Ethics Policy
- 3.Workers Interview

Any other comments:

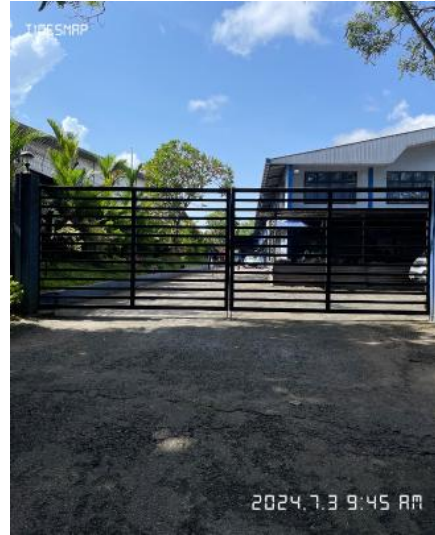
None

<p>Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: Factory has incorporated their business ethics in their code of conducts.</p>
<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has provided training to the relevant personnel.</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The facility updates the policies whenever required.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Factory has not communicated such to their suppliers yet.</p>

Attachments



1. Name board.JPG



2.Main Entrance to the factory.JPG



3.Security post near entrance.JPG



4.Side view of the facility.JPG



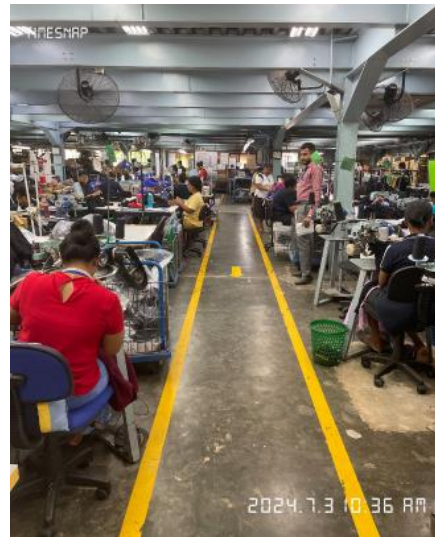
5.Raw material stores.JPG



6.SHIMA section.JPG



7.Washing section.JPG



8.Linking section.JPG



9.Sewing section.JPG



10.Embroidery section.JPG



11.Finished Good storage.JPG



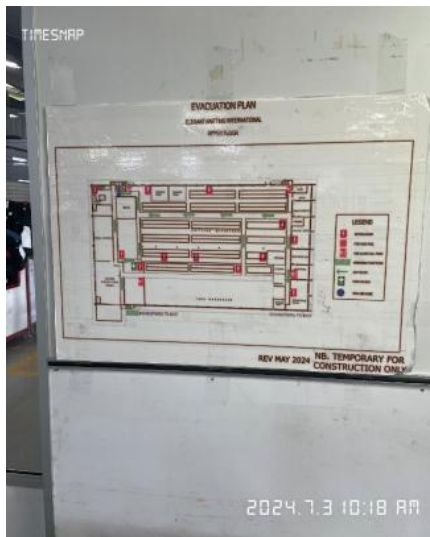
12.Fire panel board.JPG



13.Fire alarm call point.JPG



14.Fire extinguishers.JPG



15.Emergency Evacuation Map.JPG



16.Emergency Assesmbly point.JPG



17.First Aid Box.JPG



18. Medical room.JPG



19.Suggestion Box.JPG



20.Finger print machine.JPG



21.Emergency Lights.JPG



22.Metal gloves used by cutters.JPG



23.ETI code displayed at notice board.JPG



24.Chemical room.JPG



25.Eye wash station at washing section .JPG



26.Toilet facility.JPG



27.Air compressor.JPG



28.Boiler.JPG



29.Waste water treatment plant.JPG



30.Front view of the hostel.JPG



31.Inside of a room.JPG



32.Fire Extinguishers at dormitory.JPG



33.First Aid Box at dormitory.JPG



34. Emergency Lights at dormitory.JPG



35.Bathing facility at dormitory.JPG



36.Toilet at dormitory.JPG



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