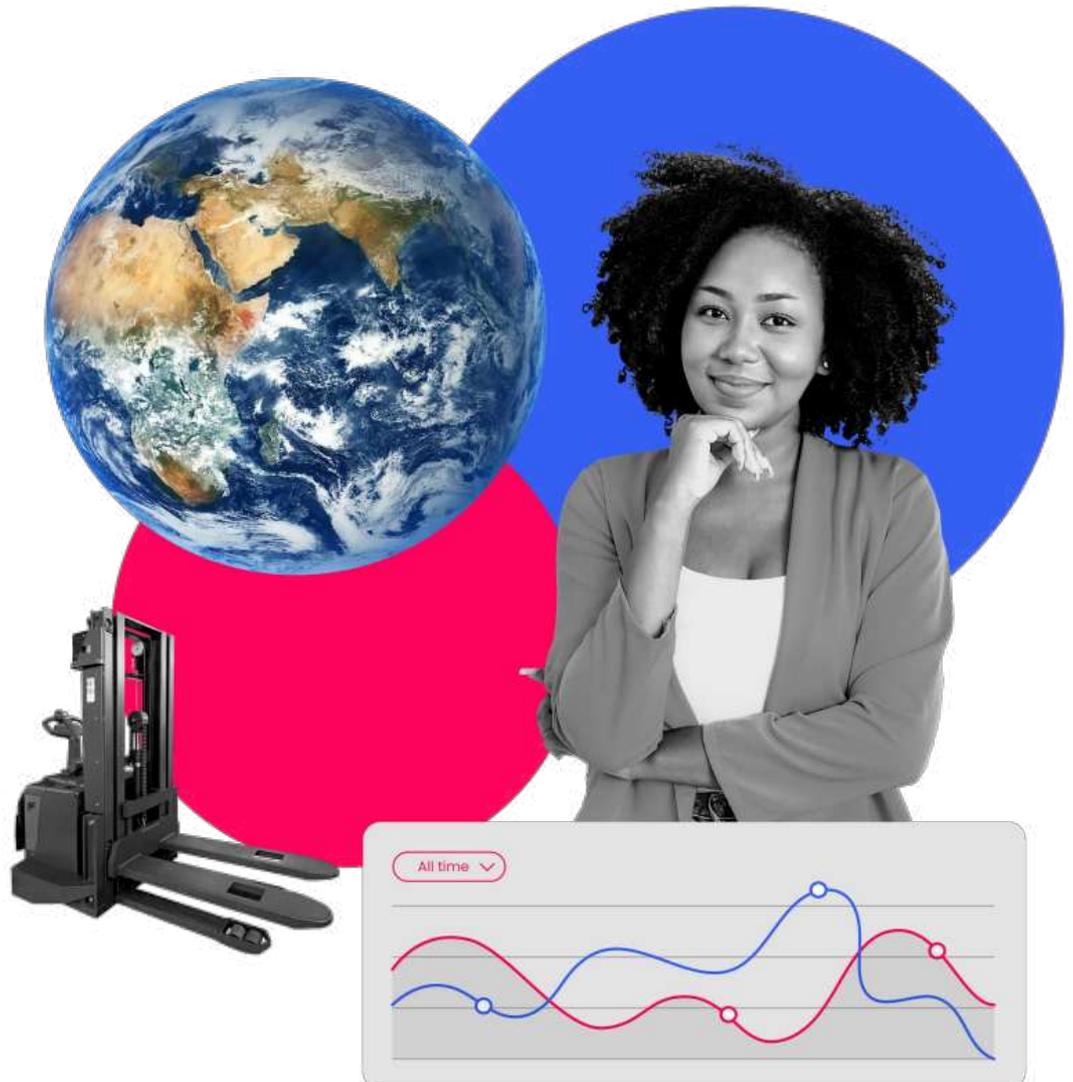


# Sedex Members Ethical Trade Audit Report

Version 7



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## Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

### Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & Entitlement to Work
  - 2: Freedom of Association and Right to Collective Bargaining are Respected
  - 4: Child Labour Shall Not be Used
  - 5: Legal Wages are Paid
  - 5.A: Living Wages are Paid
  - 6: Working Hours are Not Excessive
  - 7: No Discrimination is Practiced
  - 8: Regular Employment is Provided
  - 8.A: Sub-contracting and Homeworkers are Used Responsibly
  - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

### Included in a 4-Pillar audit:

1. Labour Standards Code Areas
  - As 2-pillar
2. Health & Safety Code Area
  - As 2-pillar
3. Environment Code Area:
  - 10.A: Environment 2-Pillar
  - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
  - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

## Audit and site details

### Audit details

<b>Sedex company reference</b>	ZC5000030906	<b>Auditor company name</b>	ALGI Pakistan
<b>Date of audit</b>	2025-05-12	<b>Audit conducted by</b>	Sedex member
<b>Audit pillars</b>	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		

### Site details

<b>Sedex site reference</b>	ZS1000036158	<b>Site name</b>	Weldon Instruments
<b>Business name</b>	Weldon Instruments	<b>Site address</b>	51310 Ganjay Wali Street, Rai Pur Stop, Wazirabad Road, Sialkot, PK

## Audit parameters

Time in and out	Day 1		Day 2	
	In	08:57	In	08:56
	Out	18:03	Out	13:04
Audit type	Periodic			
Was the audit announced?	Semi announced			
Was the Sedex SAQ available for review?	No			
Who signed and agreed CAPR?	Imran Shahid / GM/Compliance Manager			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

## Audit attendance

	Senior management	Worker representative	Union representative
<b>A: Present at the opening meeting?</b>	Yes	Yes	No
<b>B: Present at the audit?</b>	Yes	Yes	No
<b>C: Present at the closing meeting?</b>	Yes	Yes	No
<b>Reason for absence at the opening meeting</b>	There were no union in the factory, although there is worker council committee in the factory as an alternative of union as per local law. All the management and workers representative present in the opening meeting.		
<b>Reason for absence during the audit</b>	All the management and workers representative present in the audit activity.		
<b>Reason for absence at the closing meeting</b>	All the management and workers representative present in the closing meeting.		

# SMETA declaration

## Auditor team

### SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

None

Lead auditor

Muhammad Ejaz

APSCA Number

21700894

Additional auditor

Zubair Elahi

APSCA Number

32200131

Date of declaration

2025-05-13

## Site representation

<b>Declaration</b>	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
<b>Full name</b>	Imran Shahid
<b>Title</b>	GM/Compliance Manager
<b>Date of declaration</b>	2025-05-13

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
<b>3. Working conditions are safe and hygienic</b>	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC <a href="#">ZAF600918217</a>
	3.H Where identified as necessary to reduce r...	Local law	NC <a href="#">ZAF600918218</a>
	3.O Implement an appropriate electrical safet...	Local law	NC <a href="#">ZAF600918219</a>
	3.R Provide clean and secure toilets, wash ar...	Local law	NC <a href="#">ZAF600918220</a>
	3.R Provide clean and secure toilets, wash ar...	Local law	NC <a href="#">ZAF600918221</a>
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC <a href="#">ZAF600930155</a>
	3.N Maintain a log of all hazardous substance...	Base code	NC <a href="#">ZAF600930156</a>
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC <a href="#">ZAF600930157</a>
	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC <a href="#">ZAF600930158</a>
	3.A Ensure a safe working environment. Put in...	Local law Base code	NC <a href="#">ZAF600930159</a>
3.R Provide clean and secure toilets, wash ar...	Local law Base code	NC <a href="#">ZAF600930160</a>	
<b>8. Regular employment is provided</b>	8.A Provide a written contract or other bindi...	Local law Base code	NC <a href="#">ZAF600930161</a>

# Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly				
9. No harsh or inhumane treatment is allowed				
10.A. Environment 2-Pillar				
10.C. Business ethics				

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

## Site details

### Company and site details

Sedex company reference	ZC5000030906	
Sedex site reference	ZS1000036158	
Company name	Weldon Instruments	
Business ownership type	GOODS	
Site name	Weldon Instruments	
Site name in local language	None	
GPS location	GPS address	Ganjay Wali Street, Rai Pur Stop, Wazirabad Road, Sialkot.
	Coordinates	Latitude: 32.476598613893664, Longitude: 74.42659314360822
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Imran Shahid
	Job title	GM / Compliance Manager
	Phone number	00923008715995
	Email	export@weldoninstruments.com
Applicable business and other legally required business license numbers and documents	Labour Registration Certificate: F/SKT/131 NTN # 2749919-7 SCCI: C-3026 Building Stability Certificate in Form-K from Saddal Associates (PEC # 8787)	

### Site activities

Site function	Factory Processing/Manufacturer
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## Site activities

Site activities	Primary	Manufacture of medical and dental instruments and supplies
	Secondary	
	Other	
Product type	Surgical Instruments.	
Process overview	<p>Products: Surgical Instruments.</p> <p>Main Operations: Milling, Drilling, Setting &amp; Fitting, Sandblasting, Grinding &amp; Polishing, Ultrasonic, Checking &amp; Packing.</p> <p>Product Lines: 04 Lines Milling Section, 04 Lines Drilling Section, 07 Lines Setting &amp; Fitting Section, 02 Lines Sandblasting Section, 04 Lines Grinding &amp; Polishing Section, 02 Lines Ultrasonic Section, 05 Lines Checking &amp; Packing Section.</p> <p>Main Equipments: 07 Milling Machines, 05 Drilling Machines, 04 Sandblasting Section, 09 Grinding &amp; Polishing Machines, 04 Ultrasonic Cleaning Machines, 10 Checking &amp; Packing Tables &amp; generator of 200KV.</p>	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

## Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	4225m <sup>2</sup>

## Site scope

<b>Building 1</b>	<b>Last construction works on site</b>	2024
	<b>If building is shared, provide details</b>	None
	<b>Number of floors</b>	3
	<b>Description of floor activities</b>	Section Wise facility layout was as following. Factory consists of one Building (based on ground + 2 Floors): Ground floor is occupied by Management offices, meeting Room, Security room, Setting/Fitting Section, Dispatch Section, Milling Section, Sandblast Section, Polishing Section and Drilling Section. First floor is occupied by checking Section, Packing Section, Ultrasonic Cleaning Section, Grinding Section and Semi Finished Store. Second floor is occupied by Polishing Section.

**Is there any difference between the site scope of the audit and the Sedex site profile?** No

**Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?** No

**Is any activity conducted onsite not included within the scope of the audit?** No

## Worker accommodation and transport

**Are there any site-provided worker accommodation buildings?** No

**Does the site organise worker transport to the worksite?** Not provided  
Since all employees reside within a 1-kilometer radius, transportation services are not required.

## Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night shift work at the site? No

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? Other certification  
ISO 13485:2016 which is valid till 30 March 2028.

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No  
This is not applicable on factory as per legal requirement to assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No  
Factory has not conducted Human Rights Impact Assessment (HRIA).

# Worker analysis

Gender disaggregated data available

Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	220 (88%)	30 (12%)	- -	250 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	220 (88%)	30 (12%)	- -	250 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

\* % of total workforce

## Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 -	0 -	- -	0 (0%)
International migrant workers	0 -	0 -	- -	0 (0%)
<b>Total migrant workers</b>	<b>0 -</b>	<b>0 -</b>	<b>- -</b>	<b>0 (0%)</b>

\* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Not applicable.

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	34 (91.9%)	3 (8.1%)	- -	37 (14.8%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

\* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit? Yes

Please list the nationalities of all workers, with the three most common nationalities listed first Pakistani

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Pakistani	88%	12%	-	100%

## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	220 (88%)	30 (12%)	- -	250 (100%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	220 (88%)	30 (12%)	- -	250 (100%)
Other	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details      None

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	5 (100%)	0 (0%)	- -	5
Supervisors or team leaders	15 (100%)	0 (0%)	- -	15
Administrative staff	15 (100%)	0 (0%)	- -	15

## Worker interview summary

Gender disaggregated data available      Men and women

Which methods of worker engagement were used?      Individual interviews  
Group interviews

### Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers?      Yes

Was the interview sample representative of the gender composition of the workforce?      Yes

Number and size of group interviews      4 Groups of 5 Workers (4x5)=20

Did workers understand the purpose of the audit?      Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?      Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?      No

What was the general attitude of the workers towards their workplace?      Favorable

## Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details)  Not applicable.
What did the workers like the most about working at this site?	Equal opportunities Training and development Work environment – comfort (e.g. temperature, noise or dust levels) Workplace benefits (e.g. child care provisions) Facilities (e.g. rest area, recreation, canteen) Grievance mechanisms Freedom of movement Job security Overtime Social activities and events Pay Hours worked, rest days or breaks Work atmosphere (e.g. treatment by supervisors) Social dialogue (e.g. freedom to associate) Contracts Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.)
Additional comments	Workers found quite satisfied working in this factory as they are provided with social benefits, which includes social security, EOBI (Employee Old Age Benefits Institutions) and group life insurance, moreover on time salary and wages payments and mandated leaves are provided. Workers had open channels for suggestions, complaints, and concerns.
Attitude of workers' committee/union representatives	As per the interviewed committee members, all the committee members are happy with the factory management. Regular meetings are held and the grievances are taken care of by the management.
Attitude of managers	As per the interviewed committee members, all the committee members are happy with the factory management. Regular meetings are held and the grievances are taken care of by the management.

## Workers interviewed by type

	Total
Permanent workers	27
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0

## Workers interviewed by type

Total number of workers interviewed	27
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## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	15	5	-	20
Workers interviewed individually	5	2	-	7

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	1.0%	-	3.0%
Last full calendar year (2024)	2.0%	1.0%	-	3.0%
Previous full calendar year (2023)	2.0%	1.0%	-	3.0%

\* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	0.0%	-	1.0%
Last full calendar year (2024)	1.0%	0.0%	-	1.0%
Previous full calendar year (2023)	1.0%	0.0%	-	1.0%

\* Number of days lost through job absence in the year, calculated as (the 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\*100

Are accidents recorded?      Yes  
 Factory has maintained injury log in the factory.

## Annual number of work related accidents and injuries (per 100 workers)\*

	Men	Women	Other	Total
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### Annual number of work related accidents and injuries (per 100 workers)\*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Calculated as (number of work related accidents and injuries \* 100) / number of total workers.

### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Calculated as (number of lost days due to work accidents and work related injuries \* 100) / number of total workers.

### Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

### Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

## Percentage of workers that work on average more than 60 total hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	<p><b>System:</b> The facility ensures transparency and cooperation during audits by providing unrestricted access to necessary documents, interviews, and areas. It also has a strict anti-bribery policy in place, which all employees are trained on to ensure ethical interactions. Additionally, the facility maintains accurate and up-to-date records, including its site description and SEDEX profile. It also has a comprehensive human rights policy, which is communicated to relevant personnel and regularly reviewed for effectiveness.</p> <p><b>Evidence:</b> During the facility assessment, the auditor conducted a thorough evaluation, which included:</p> <ul style="list-style-type: none"> <li>- Reviewing documents such as company policies, training records, and facility registration</li> <li>- Conducting a facility tour to assess health and safety measures, employee working conditions, and emergency preparedness</li> <li>- Conducting employee interviews to gather insights and feedback.</li> </ul>		

0. Enabling accurate assessment

## Data points

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Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
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Did any workers selected by the auditor decline to be interviewed?	No
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# 1. Employment is freely chosen

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed policy and procedures on employment is freely chosen. Policy and procedure are all in line with the local law and ETI COC.</p> <p>Resources: Grade: Robust Factory has hired a HR Manager to implement the employment policies. HR manager is acting as the point of contact for any issues or grievances regarding employment conditions. HR manager is ensuring that Employment is freely chosen is implemented and followed strictly according to the policies.</p> <p>Communication and Training: Grade: Robust Factory has provided trainings regarding employment is freely chosen to their employees and management and all the employees and management were found well aware of those policies and procedures. Factory also practicing to provide trainings to new employees that includes training on their rights to freely chosen employment, the company's policies, and their ability to leave employment voluntarily.</p> <p>Monitoring: Grade: Robust Factory is conducting their internal audits to see the implementation of policies regarding employment is freely chosen. Factory has installed complaint boxes within their premises that helps employees to raise a complaint if they have any concern or issue regarding employment practices.</p>

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

System:

1. Based on interview with the workers, management and document review, the employees could freely resign with proper notification in advance 30 days minimum.
2. The employees obtained their job by themselves by seeing advertisement or by recommendation from existing employee; they were not asking or forced to lodge deposits or their identity papers to the company at time of employment.
3. During factory visit, workers' interview and document review, there were no traces identified of forced, bonded or involuntary prison labour identified.
4. Workers were free to leave at the end of factory timing.

Evidences:

- Checked personnel files of the 27 workers
- Employment agreements
- Terms and conditions.
- Social Policy.

1. Employment is freely chosen

## Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
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Does the site utilise any workers who are prisoners?	No
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Does the site use the labour of persons required to work under any government scheme?	No
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# 1.A. Responsible recruitment and entitlement to work

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p><b>Policy and procedure:</b> Grade: Robust Factory has developed policy and procedures on Responsible recruitment and entitlement to work. Policy and procedure are all in line with the local law and ETI COC. Factory is not using any recruitment agency to hire workers and factory is not charging any fees from workers to hire.</p> <p><b>Resources:</b> Grade: Robust Factory has developed HR department for the recruitment process of workers and this HR department is supervised by qualified HR manager. The role of HR manager is to make sure that workers are hired directly by factory and making sure that no labour providers are use by factory.</p> <p><b>Communication and Training:</b> Grade: Robust Factory has provided trainings regarding Responsible recruitment and entitlement to work to their employees and management and all the employees and management were found well aware of those policies and procedures.</p> <p><b>Monitoring:</b> Grade: Robust Factory is conducting their internal audits to see the implementation of policies regarding responsible recruitment and entitlement to work. Factory has installed complaint boxes within their premises that helps employees to raise a complaint if they have any concern or issue regarding employment practices.</p>

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

**Systems and evidence examined to validate this code section**

**System:**

1. There are no foreign nationals employed onsite.
2. All employees' personal data files have photocopies of documentation showing that they have local citizenship and do not need special permission to work in the factory.

**Evidences:**

1. Social Policy Manual
2. Employee pay roll
3. Personal data files (27 personnel files were checked for proof of identity documentation).

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

#### Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No

There is no any indication and evidence found in workers interviews about recruitment fees or costs. All the workers hired directly without any fees and cost.

## 2. Freedom of association and right to collective bargaining are respected

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed policies and procedures on freedom of association and right to collective bargaining are respected as per policy all the workers have the rights to freely join workers committee or trade unions. Factory recognizes the right of employees to engage in collective bargaining with their employer. All the policies and procedures are as per local law and ETI COC.</p> <p>Resources: Grade: Robust Factory has hired a responsible person to implement policies and procedures regarding freedom of association and right to collective bargaining. Factory has conducted an election to develop workers committee within their premises for their workers.</p> <p>Communication and Training: Grade: Robust Factory has provided trainings to their employees regarding freedom of association and right to collective bargaining, factory has communicated policy and procedures regarding freedom of association and right to collective bargaining to their workers.</p> <p>Monitoring: Grade: Robust Factory is implementing robust management in freedom of association and right to collective bargaining by developing feedback mechanism from workers and by taking feedback from workers committee members and further factory is monitoring compliance of this section by conducting internal audit periodically.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

**Systems and evidence examined to validate this code section**

**System:**

1. Worker Council Committee was established in the Company; 05 workers representatives were the members of this council. Worker's representatives were elected on 01-02-2024 for open attitude and communication between the Company management and workers.
2. Workers representative's meetings were in practice to discuss any issues, demands and suggestions of employees and to address the issues or suggestions to management.
3. Last meeting was conducted on 08-08-2024 to highlight the preventive action for safe working conditions keeping in mind the situation of transmittable diseases.
4. The workers can complain to their supervisors directly, through their representatives, or as per open door policy; directly to the management, although the suggestion box was available in the Company for collecting workers complaints and suggestions.

**Evidences:**

- Worker Council Committee election records
- Worker Council Committee minutes
- Interviews and discussion with workers and council representatives
- Suggestion Boxes Record

## 2. Freedom of association and right to collective bargaining are respected

### Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

### 3. Working conditions are safe and hygienic

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

## Management systems

### Explanation for management systems grades

#### Policy and Procedure:

Grade: Some Improvements Recommended

The facility has established policies and procedures regarding health and safety, which demonstrates a good foundation. However, there is room for improvement by updating safety procedures to address evolving risks, which would elevate the facility to full compliance.

#### Resources:

Grade: Some Improvements Recommended

The facility has established a health and safety committee, which is a positive step, however, to further strengthen resources, delegating tasks and empowering health and safety team members is recommended. Additionally, factory should provide proper fencing or grided cages for gas cylinders being used in production processes, factory should provide adequate PPEs to workers in polishing & ultrasonic sections, factory should cover the loose wiring and would provide rubber mat beneath electrical panel, factory should provide disposable vessels at drinking water point, factory should arrange proper measures of cleanliness of washrooms and washing facility will provide soap and tissues and install the flush system in washrooms, factory should provide the secondary containment for Chemical Drums of Ultrasonic Cleaning on Ground Floor, factory should provide the spill kit in ultrasonic cleaning chemical store area, all chemical drums are clearly labeled with the chemical name, hazard symbols near the ultrasonic cleaning Chemical store area, factory should install safety pulley guards, belt covers on 1st floor polishing section, factory should develop the childcare room within the factory for their workers as per legal requirement factory should develop proper canteen as per legal requirement with proper seating capacity.

#### Communication and Training:

Grade: Some Improvements Recommended

Currently, training is lacking for workers and management staff regarding essential health and safety procedures, and factory must re-train their workers on health and safety, machine safety, Proper usage of PPEs, Fire safety, chemical safety, sanitary conditions, importance of child care room and electrical safety.

#### Monitoring:

Grade: Some Improvements Recommended

Further strengthening of monitoring can be achieved by implementing continuous monitoring of Health and safety system.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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<b>3. Working conditions are safe and hygienic</b>	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC <a href="#">ZAF600918217</a>
	3.H Where identified as necessary to reduce r...	Local law	NC <a href="#">ZAF600918218</a>
	3.O Implement an appropriate electrical safet...	Local law	NC <a href="#">ZAF600918219</a>
	3.R Provide clean and secure toilets, wash ar...	Local law	NC <a href="#">ZAF600918220</a>
	3.R Provide clean and secure toilets, wash ar...	Local law	NC <a href="#">ZAF600918221</a>
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC <a href="#">ZAF600930155</a>
	3.N Maintain a log of all hazardous substance...	Base code	NC <a href="#">ZAF600930156</a>
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC <a href="#">ZAF600930157</a>
	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC <a href="#">ZAF600930158</a>
	3.A Ensure a safe working environment. Put in...	Local law Base code	NC <a href="#">ZAF600930159</a>
3.R Provide clean and secure toilets, wash ar...	Local law Base code	NC <a href="#">ZAF600930160</a>	

**Systems and evidence examined to validate this code section**

**System:**

1. Workers and management interview show the factory has provided first aid, firefighting and fire drill trainings to their workers. Factory provided relevant records for review.
2. There are 03 first aiders and 03 fire fighters.
3. Factory had planned and arranged the fire drill twice a year, which included the evacuation exercise. The factory provided relevant records for review.
4. Based on on-site observation, there are 03 first aid kits were available in the factory. Trained first aiders were available in the factory.
5. There are 23 Fire extinguishers, 03 fire alarm call points, 10 smoke detectors and 08 fire buckets.
6. Factory provided adequate number of toilets.
7. EHS/OHS Committee was responsible for H&S issues in the factory.
8. Building stability certificate and approved building map was available.
9. The factory had established health and safety policy. Injury record was maintained.
10. Emergency contact numbers were displayed prominently in production, management and main gate.
11. Factory has provided PPEs as per process requirement such as face masks and ear plugs.
12. Factory has given the responsibility to Mr. Ali Raza regarding H&S System implementation in the facility.

**Evidence:**

- Fire Drill Record
- Electrical Inspection Record
- Injury Record
- Employee handbook
- Health & Safety Producer
- Training Records
- Building Map
- Risk Assessment
- Fire Extinguishers Inspection
- Fire Alarm Inspection
- Illuminating Exit Sign and Emergency Lights Inspection
- Electrical installation inspection Checklist
- Machine Maintenance inspection record
- Safety Warning Signs Inspection.

# Findings: non-compliances

ZAF600918217

Non-compliance

Due 2024-07-08

## Code area

3 Working conditions are safe and hygienic

## Status

Open\*

## Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

## Time given to resolve

30 days

## Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

## Verification method

Desktop audit

## Description

It was noted during facility visit that gas cylinders being used in welding & boil tests were not store with fencing or cage on ground floor.

## Area of non-compliance/non-conformance

Local law  
Base code

## Description (carried over)

It was noted during facility visit that gas cylinders being used in welding & boil tests were not store with fencing or cage on ground floor.

## Corrective and preventative actions

It was agreed by the facility that they would provide proper fencing or grilled cages for gas cylinders being used in production processes.

## Corrective and preventative actions (carried over)

It was agreed by the facility that they would provide proper fencing or grilled cages for gas cylinders being used in production processes.

## Local law reference

In accordance with: Factories Act 1934, Section 26, In every factory the following shall be securely fenced by the safeguards of substantial construction which shall be kept in position while the parts of machinery required to be fenced are in motion or in use.

## Evidence



[03. Cylinders Found Without Fencing & Caged.jpg](#)



[02. Cylinders Found Without Fencing & Caged.jpg](#)



[01. Cylinders Found Without Fencing & Caged.jpg](#)



[Cylinders Found Without Fencing \(4\).jpg](#)



[Cylinders Found Without Fencing \(3\).jpg](#)



[Cylinders Found Without Fencing \(2\).jpg](#)



[Cylinders Found Without Fencing \(1\).jpg](#)



\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600918218

Non-compliance

Due 2024-07-08

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

**Time given to resolve**

30 days

**Issue title**

278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

**Verification method**

Desktop audit

**Description**

It was noted during facility visit that 3 workers in polishing department on ground floor and 1 worker in ultrasonic cleaning section were not wearing adequate PPEs such as eye goggles & face masks in polishing and aprons, gloves, eye goggles and respiratory masks in ultrasonic section.

**Area of non-compliance/non-conformance**

Local law

### Description (carried over)

It was noted during facility visit that 3 workers in polishing department on ground floor and 1 worker in ultrasonic cleaning section were not wearing adequate PPEs such as eye goggles & face masks in polishing and aprons, gloves, eye goggles and respiratory masks in ultrasonic section.

### Corrective and preventative actions

It was agreed by the facility that they would provide adequate PPEs to workers in polishing & ultrasonic sections.

### Corrective and preventative actions (carried over)

It was agreed by the facility that they would provide adequate PPEs to workers in polishing & ultrasonic sections.

### Local law reference

In accordance with the Factories Act 1934 (XXV of 1934), Chapter III, Health & Safety, section 16 (1) dust and fume, in every factory, in which by reason of the manufacturing process carried on, there is given off any dust or fume or other impurity of such a nature and to such an extent as is likely to be injurious or offensive to the workers employed therein, effective measures shall be taken to prevent its accumulation in any work room and its inhalation by workers.

### Evidence



[Workers were not using PPEs in Polishing 1.jpg](#)



[Workers were not wearing PPEs in Polishing department.jpg](#)



[Workers were not wearing PPEs in Ultrasonic Department.jpg](#)



\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600918219

Non-compliance

Due 2024-07-08

### Code area

3 Working conditions are safe and hygienic

### Status

Closed (2025-05-13)\*

**Workplace requirement**

3.0 Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

**Time given to resolve**

30 days

**Issue title**

228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels

**Verification method**

Desktop audit

**Description**

It was noted during facility visit that loose wiring was found in checking & packing section and rubber mat was missing beneath 1 electrical panel near polishing section at ground floor.

**Area of non-compliance/non-conformance**

Local law

**Description (carried over)**

It was noted during facility visit that loose wiring was found in checking & packing section and rubber mat was missing beneath 1 electrical panel near polishing section at ground floor.

**Corrective and preventative actions**

It was agreed by the facility that they would cover the loose wiring and would provide rubber mat beneath electrical panel.

**Corrective and preventative actions (carried over)**

It was agreed by the facility that they would cover the loose wiring and would provide rubber mat beneath electrical panel.

**Local law reference**

In Accordance with: Electricity rules 1937, 49. Construction, insulation and earthing of apparatus. (1) All apparatus shall be sufficient in power and size and of sufficient mechanical strength for the work it may be required to do, and so far, as is practicable, shall be so constructed, installed, protected, worked and maintained as to prevent danger

**Evidence**



[Rubber Mat Missing Beneath 1 Panel.jpg](#)

[Loose Wiring Found Near Ultrasonic \(2\).jpg](#)

\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600918220

Non-compliance

Due 2024-06-08

**Code area**

3 Working conditions are safe and hygienic

**Workplace requirement**

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

**Issue title**

299 - No/inadequate availability of clean drinking water (that meets the World Health Organisation standard for potable water)

**Description**

It was noted during facility visit that disposable vessels e.g. cups or glasses were not provided at drinking water point on ground floor.

**Description (carried over)**

It was noted during facility visit that disposable vessels e.g. cups or glasses were not provided at drinking water point on ground floor.

**Corrective and preventative actions**

It was agreed by the facility that they would provide disposable vessels at drinking water point.

**Corrective and preventative actions (carried over)**

It was agreed by the facility that they would provide disposable vessels at drinking water point.

**Local law reference**

In accordance with: Punjab Factory Rules 1978 Rule 40(5) the water required to be provided under sub-rule (i) shall be kept in clean and suitable vessels, shall be renewed daily and all. Practicable, steps shall be taken to preserve the water and the vessel in which it is contained free from contamination.

**Evidence**



[Disposable Vessels Missing at Drinking Water Point \(2\).jpg](#) 

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ZAF600918221

Non-compliance

Due 2024-07-08

**Code area**

3 Working conditions are safe and hygienic

**Status**

Closed (2025-05-13)\*

**Workplace requirement**

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

**Time given to resolve**

30 days

**Verification method**

Desktop audit

**Issue title**

329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic/not clean

**Area of non-compliance/non-conformance**

Local law

**Description**

It was noted during facility visit that workers washrooms and hand washing facilities were found in unclean condition, moreover soap & tissues were missing at hand washing basins and flush system was not installed in toilets on ground floor.

**Description (carried over)**

It was noted during facility visit that workers washrooms and hand washing facilities were found in unclean condition, moreover soap & tissues were missing at hand washing basins and flush system was not installed in toilets on ground floor.

**Corrective and preventative actions**

It was agreed by the facility that they would arrange proper measures of cleanliness of washrooms and washing facility will provide soap and tissues and install the flush system in washrooms.

**Corrective and preventative actions (carried over)**

It was agreed by the facility that they would arrange proper measures of cleanliness of washrooms and washing facility will provide soap and tissues and install the flush system in washrooms.

**Local law reference**

In accordance with Punjab Factories Rules Provisions for Washing Accommodation 41. In every factory, the following facilities shall be provided for the workers: (c) Soap nail brushes and clean towels shall be provided and kept available for workers free of cost at every wash basin. Regular arrangement shall be made for the replacement of used towels with clean towels if and when the former appear unclean.

**Evidence**



[Washroom Found Uncleaned & Flush System Missing.jpg](#)



[Soap & Tissue Missing & Facility not Cleaned.jpg](#)



\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600930155

Non-compliance

Due 2025-06-18

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

**Time given to resolve**

30 days

**Issue title**

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbunded)

**Verification method**

Desktop audit

**Description**

It was noted during factory visit that in ultrasonic cleaning chemical drums were stored without secondary containment at ground floor.

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

It was agreed by the facility that they would provide the secondary containment for Chemical Drums of Ultrasonic Cleaning on Ground Floor.

**Local law reference**

Punjab Hazardous substance Rule 2018 18 a) Packing and Labeling: (1) A container of a hazardous substance shall be of such size, material and design as to ensure that – a) It can be stored, transported and used without leakage, and safely; b) The hazardous substance there in does not deteriorate in a manner as to render it more likely to cause, directly or in combination with other substances, an adverse environmental effect.

**Evidence**



[In ultrasonic cleaning chemical drums were stored without secondary containment at ground floor..jpg](#)



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**ZAF600930156**

**Non-compliance**

**Due 2025-06-18**

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

**Time given to resolve**

30 days

**Issue title**

241 - No/inadequate spill kit provided for handling chemical spillage and leakage

**Verification method**

Desktop audit

**Description**

It was noted during factory visit that spillage of chemical found in ultrasonic cleaning chemical store area and there was no spill kit available for controlling the spillage of oil.

**Area of non-compliance/non-conformance**

Base code

**Corrective and preventative actions**

It was agreed by the factory management that they will provide the spill kit in ultrasonic cleaning chemical store area.

**Evidence**



[Spillage of chemical found in ultrasonic cleaning chemical store area and there was no spill kit available for controlling the spillage of oil..jpg](#) 

\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

**ZAF600930157**

**Non-compliance**

Due 2025-06-18

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

**Time given to resolve**

30 days

**Issue title**

233 - Hazardous substances (e.g. chemicals and pesticides) are stored unlabelled or labelling is incorrect

**Verification method**

Desktop audit

**Description**

It was noted during factory visit that ultrasonic cleaning chemical drums were stored without identification near ultrasonic cleaning chemical store area.

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

The Factory Management has agreed to ensure all chemical drums are clearly labeled with the chemical name, hazard symbols near the ultrasonic cleaning Chemical store area.

**Local law reference**

PUNJAB HAZARDOUS SUBSTANCES RULES, 2018 ENVIRONMENT PROTECTION DEPARTMENT, PUNJAB 18. INFORMATION REGARDING HANDLING OF HAZARDOUS SUBSTANCES a) Packing and Labeling: (1) A container of a hazardous substance shall be of such size, material and design as to ensure that – a) It can be stored, transported and used without leakage, and safely; b) The hazardous substance there in does not deteriorate in a manner as to render it more likely to cause, directly or in combination with other substances, an adverse environmental effect. (2) The following information shall be printed conspicuously, legibly and indelibly on every container of a hazardous substance – (a) Name of the hazardous substance; (b) Name, address and license number of the licensee; (c) Net contents (volume or weight); (d) Date of manufacture and date of expiry, if any; (e) A warning statement comprising – i. The word “DANGER!” in red on a contrasting background; ii. A picture of a skull and crossbones; iii. Pertinent instructions for use, storage and handling and safety precautions relating thereto. (f) Instructions regarding return or disposal of the empty container: i. Provided that if the hazardous substance has an inner container as well as an outer container, the information shall be printed on both containers. ii. Provided further that if it is impracticable to print the aforesaid information on the container itself due to its size, material or design, the same shall be printed on a label or tag which shall be conspicuously affixed or attached to the container in such manner as to render it difficult to remove. The empty chemical containers / drums may not be used for other purposes. (g) Basic instructions mentioning immediate steps to be taken in case of any accident or emergency, preferably in local language.

**Evidence**



[Ultrasonic cleaning chemical drums were stored without identification near ultrasonic cleaning chemical store area..jpg](#)

\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

**ZAF600930158**

**Non-compliance**

**Due 2025-06-18**

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

**Time given to resolve**

30 days

**Issue title**

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

**Verification method**

Desktop audit

**Description**

It was noted during factory visit 03 out of 10 polishing machine was not installed pulley guard / belt covers on 1st floor polishing section

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

It is agreed by the factory management that they install safety pulley guards, belt covers on 1st floor polishing section.

**Local law reference**

Local Law reference: In accordance with Factories Act, 1934, Chapter III Health & Safety Section 26. Fencing of machinery. In every factory parts of the machinery required to be fenced shall be securely fenced by the safeguards of substantial construction which shall be kept in position while part are in motion or in use. Provided that in the case of dangerous parts of the machinery that cannot be securely fenced by reason of the nature of operation, such fencing may be substituted by other adequate measures, such as (i) devices automatically preventing the operation from coming into contact with the dangerous parts and (ii) automatic stopping devices.

**Evidence**



[02. Pulley guard belt covers not installed on 1st floor polishing section.jpg](#)

[01. Pulley guard belt covers not installed on 1st floor polishing section.jpg](#)

\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600930159

Non-compliance

Due 2025-06-18

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

**Issue title**

397 - Childcare facilities are not provided in alignment with legal requirements

**Description**

It was noted during factory visit that factory has not developed childcare room for their workers within the factory as per the legal requirement.

**Corrective and preventative actions**

It was agreed by the factory management that they will develop the childcare room within the factory for their workers as per legal requirement.

**Local law reference**

legal requirement Factory act 1934 Amendment of section 24 of Act XXV of 1934.- 33-Q. Additional power to make health and safety rules relating to shelters during rest. - (2) Rooms for children. - The Provincial Government may also make rules • (a) requiring that in any specified factory, wherein more than fifty women workers are ordinarily employed, a suitable room shall be reserved for the use of children under the age of six years belonging to such women, and • (b) prescribing the standards for such rooms and the nature of the supervision to be exercised over the children therein, the word “women”, appearing for the first time, shall be omitted). Additional power to make health and safety rules relating to shelters during rest section (2).

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ZAF600930160

**Non-compliance**

Due 2025-07-18

**Code area**

3 Working conditions are safe and hygienic

**Workplace requirement**

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

**Issue title**

336 - Canteen provided is insufficient to meet legal requirements and/or worker needs

**Description**

It was noted during factory visit that factory has not developed proper canteen with 30 % workers seating capacity for their workers within the factory as per the legal requirement.

**Corrective and preventative actions**

It was agreed by the factory management that they will develop proper canteen as per legal requirement with proper seating capacity.

**Status**

Open\*

**Time given to resolve**

60 days

**Verification method**

Desktop audit

**Area of non-compliance/non-conformance**

Local law  
Base code

### Local law reference

Local Law Reference: In accordance with West Pakistan Factories Canteens Rules 1959, section-3 Canteens Para 4(1) the dining hall shall accommodate at a time at least thirty percent of the workers working at a time and in Accordance the factories act 1934 section 24. Power to make rules for provision of canteens: (1) The Provincial Government may make rules requiring that in any specified factory wherein more than two hundred and fifty workers are ordinarily employed, an adequate canteen shall be provided for the use of the workers. (2) Without prejudice to the generality of the foregoing power, such rules may provide for. (a) The date by which such canteen shall be provided: (b) the standards in respect of construction, accommodation, furniture and other equipment of the canteen; (c) the foodstuffs to be served therein and the charges which may be made there for: (d) representation of the workmen in the management of the canteens (e) enabling, subject to such conditions, if any, as may be specified, the power to make rules under clause (c) to be exercised also by the Chief Inspector.

### Evidence



[Factory has not developed proper canteen with 30 % workers seating capacity.jpg](#) 

\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Yes factory does have building stability certificate.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed has developed policy and procedure regarding child labor and factory has developed child remediation plan. All the policies and procedures are aligned with ILO, local law and ETI COC.</p> <p>Resources: Grade: Robust Factory has hired a responsible person and the role of responsible person is to make sure that no worker under legal minimum wage was hired in the factory. Further responsible person has communicated and enforced child labour policy in across all levels of the organization, including employees, supervisors and managers.</p> <p>Communication and Training: Grade: Robust Factory has trained their all employees on the company child labour policy and its frame work and factory has provided detailed trainings to senior management and supervisors on their roles and responsibilities regarding child labour prevention.</p> <p>Monitoring: Grade: Robust Factory is implementing robust management in child labour by conducting internal and external audits within their premises.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

**System:**

1. There are no apparent concerns related to child labour at the factory.
2. The factory has a policy in place to participate in and contribute to programs that provide for the transition of a child found to performing child labour in order to enable the child to attend and remain in quality education until no longer a child.
3. No juvenile workers (under the age of 18) are employed at the factory.
4. All practices regarding youth employment at the factory appear to be in line with ILO conventions

**Evidence:**

1. Social Policy Manual
2. Recruitment notices
3. Policy on child labour and remediation
4. Verification of 27 personnel files for a valid age proof document.

#### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger	14%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	21
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p><b>Policy and procedure:</b> Grade: Robust Factory has developed wage and benefits policy and procedure as per local law and ETI COC requirement. All the workers are paid as per minimum wage grading. Minimum wage policy ensures the wage transparency and non-discriminatory pay practices across departments.</p> <p><b>Resources:</b> Grade: Robust Factory has developed a department and hired a responsible person to provide wages to all the employees as per law. Factory establish the training program for all the workers twice in a year to aware all the workers regarding legal benefits and legal wage deduction such as (deductions of employee old age benefits and paid leave).</p> <p><b>Communication and Training:</b> Grade: Robust Factory has developed employee handbook as per updated policies and local laws. Factory has provided trainings to legal wages to all their employees and managers. Factory is ensuring managers are regularly trained on the latest changes in local labor laws related to wages, overtime, deductions, and benefits. Factory is taking feedback from workers regarding trainings to increase the effectiveness of trainings. However, factory shall tarin workers on legal benefits and legal wage deductions for workers awareness.</p> <p><b>Monitoring:</b> Grade: Robust Factory is implementing management in legal wages by conducting internal and external audits within their premises. Factory is using updated technology to calculate accurate wages of workers as per their working hours.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

**Systems and evidence examined to validate this code section**

System:

1. There were no deductions made for disciplinary practices.
2. There were no reports of non-compliances regarding wages at the factory and the payroll of the factory workers showed that wages were paid in line with legal requirements.
3. Wages are paid before the expiry of 07th of every month and a copy of wage slips is issued to the employees at least a day prior to the disbursement of wages.
4. All employees are guaranteed with minimum wages and are provided with all legal benefits like annual leave and Group Life Insurance.
5. No illegal deductions noticed, and no illegal deductions were reported by workers.
6. The payroll and attendance records for 12 months from May 2024 to April 2025 were available for review.

Evidence:

- Social Policy Manual
- Employment Agreements
- Leave records
- Settlement records
- Payrolls records of 27 samples from April 2025(recent month), 27 samples from October 2024(random month) and 27 samples from May 2024 (initial month) for review.
- Attendance records of 27 samples from April 2025(recent month), 27 samples from October 2024(random month) and 27 samples from May 2024 (initial month) for review.
- Production records (from work floors to check for discrepancies)
- Attendance records of 27 workers were checked.
- Payroll and Payment records of 27 employees were checked.
- Group Insurance Policy

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Mix of digital and other payment methods (give details)  20% Bank transfer and 80% Cash.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	Between 1 and 10%

### Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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### Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	208.0
Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	Max hours per day	2.0
	Max hours per week	12.0
	Max hours per month	52.0

<b>Actual overtime hours</b>	<b>Max hours per day</b>	0.0
	<b>Max hours per week</b>	0.0
	<b>Max hours per month</b>	0.0
<b>Minimum legal wage</b>	<b>Min per hour</b>	177.88
	<b>Min per day</b>	1423.0
	<b>Min per week</b>	8538.0
	<b>Min per month</b>	37000.0
<b>Actual minimum wage</b>	<b>Actual per hour</b>	177.88
	<b>Actual per day</b>	1423.0
	<b>Actual per week</b>	8538.0
	<b>Actual per month</b>	37000.0
<b>Minimum legal overtime wage</b>	<b>Min per hour</b>	Non applicable
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	Non applicable
<b>Actual minimum overtime wage</b>	<b>Actual per hour</b>	Non applicable
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	Non applicable

## Wage analysis

<b>Number of workers' records checked</b>	81
<b>Provide the date and details of the records</b>	81 permanent and directly hired workers time record and payroll checked from three sampled months (27 records from April 2025, 27 records from October 2024 and 27 record from May 2024). There are total 81 records of payroll and 81 records of time records reviewed in 3 sampled months.

Are there different legal minimum/ legally recognised CBAs wage grades?	<p>Yes</p> <p>Factory is paying as per different legal minimum wage grades. The grading for Punjab industry is defined as: 1) Unskilled 37,000/- 2) Semi Skilled A 39,088/- 3) Semi Skilled B 38,348/- 4) Skilled A 41,815/- 5) Skilled B 40,823/- 6) Highly Skilled-A 44,532/- 7) Highly Skilled-B 42,677/-</p>
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	20 % workers earned above than legal minimum wage and 80% workers earned minimum wages as per the Punjab Minimum wage Gezzette notification with grading.
Are there any bonus schemes used?	<p>Yes</p> <p>Annual profit base bonus.</p>
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>System:</p> <ol style="list-style-type: none"> <li>1. The payroll and attendance records for 12 months from May 2024 to April 2025 were available for review.</li> <li>2. Factory has paid minimum wages as per the legal requirement and other benefits such as, Group life insurance.</li> <li>3. There were no deductions made for disciplinary practices.</li> <li>4. There were no reports of non-compliances regarding wages at the factory and the payroll of the factory.</li> <li>5. Wages are paid before the expiry of 07th of every month.</li> <li>6. No illegal deductions noticed, and no illegal deductions were reported by workers.</li> </ol> <p>Evidence:</p> <ul style="list-style-type: none"> <li>• Employment Agreements</li> <li>• Bonus record</li> <li>• Group Insurance</li> <li>• Payrolls records of 27 samples from April 2025(recent month), 27 samples from October 2024(random month) and 27 samples from May 2024 (initial month) for review.</li> <li>• Attendance records of 27 samples from April 2025(recent month), 27 samples from October 2024(random month) and 27 samples from May 2024 (initial month) for review.</li> </ul>		

## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p><b>Policy and procedure:</b> Grade: Robust Factory has developed working hours policy and procedure as per local law and ETI COC requirement.</p> <p><b>Resources:</b> Grade: Robust Factory has appointed a responsible person for working hours the responsibility of responsible person is to monitor employee working hours across departments, make sure that all the working hours are being followed. Authorized person has the authority to enforce working hours policy.</p> <p><b>Communication and Training:</b> Grade: Robust Factory has provided trainings to their all of the employees regarding working hours. Factory has taken the feedback from workers regarding trainings. Senior managers are train to track working hours and overtime.</p> <p><b>Monitoring:</b> Grade: Robust Factory is implementing robust management in working hours by conducting internal and external audits within their premises. Factory is using updated technology to calculate accurate wages of workers as per their working hours.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

**System:**

1. The facility has an electronic thumb and face scanning system to track the facility's working hours.
2. As per the reviewed Attendance records for 27 samples from April 2025(recent month), 27 samples from October 2024(random month) and 27 samples from May 2024 (initial month) for review.
3. The regular working hours are maintained as per the legal requirement of 48 hours a week.
4. 7th day rest is observed to be guaranteed to all sampled employees reviewed for the sampled months of 27 samples from April 2025(recent month), 27 samples from October 2024(random month) and 27 samples from May 2024 (initial month) for review.
5. The payroll and attendance records for 12 months from May 2024 to April 2025 were available for review.

**Evidences:**

1. Time records
2. Payroll
3. Payslips
4. Working hours policy and procedure
5. Overtime policy and procedure
6. Leave Records

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Factory paid 200% as per the wage.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed policy and procedures on no-discrimination and all the policies and procedures are as per local law and ETI COC.</p> <p>Resources: Grade: Robust Factory has hired HR manager to implement non-discriminatory policy and procedure.</p> <p>Communication and Training: Grade: Robust Factory has provided trainings to all of their employees on no-discrimination policy and procedure and factory is installed complaints and suggestion box within their premises to report discrimination case.</p> <p>Monitoring: Grade: Robust Factory is implementing robust management in no-discrimination by conducting internal and external audits within their premises.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

**System:**

1. There is no apparent concerns with regard to discrimination in any form at the factory. It was observed that promotion & training opportunity is based on the worker's willingness and competency.
2. Further all the interviewed employees reported that they are treated with dignity and respect and they receive same and similar treatment like other workers.

**Evidence:**

1. Social Policy Manual
2. Labour contracts
3. Payrolls (check for equal remuneration is paid for equal work done)
4. Attendance records (attendance checked check for equal opportunities to work overtime)
5. Policy on Discrimination
6. Notice board

7. No discrimination is practiced

## Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Pakistani

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p><b>Policy and procedure:</b> Grade: Some Improvements Recommended Factory has developed policy and procedures on regular employment is provided and all the policies and procedures area as per local law and ETI COC.</p> <p><b>Resources:</b> Grade: Some Improvements Recommended Factory has hired HR manager to implement regular employment is provided policy and procedure. but factory has not issued appointment letters to some of its workers at the time of appointment in the factory.</p> <p><b>Communication and Training:</b> Grade: Some Improvements Recommended Factory has developed employee handbook which include all the rule and regulations. All the senior managers and employees are trained on factory polices and procedure but factory shall make sure to provide appointment letters/contracts to all its workers as per legal requirement.</p> <p><b>Monitoring:</b> Grade: Some Improvements Recommended Factory shall make sure that regular employment is fully implemented by conducting internal and external audits within their premises.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
8. Regular employment is provided	8.A Provide a written contract or other bindi...	Local law Base code	NC <a href="#">ZAF600930161</a>

**Systems and evidence examined to validate this code section**

System:

1. Employees have Employment Agreements/ appointment letters which are equivalent to labour contracts as they outline their rights as employees, their remuneration, etc.
2. Factory has provided appointment letters to their employees at the time of appointment in the factory.
3. The factory does not have temporary employees.

Evidences:

1. Social Policy Manual
  2. Labour contracts (for 27 employees)
  3. Payrolls (for 27 employees)
  4. Leave records
  5. Employment Agreements
-

# Findings: non-compliances

ZAF600930161

Non-compliance

Due 2025-06-18

**Code area**

8 Regular employment is provided

**Status**

Open\*

**Workplace requirement**

8.A Provide a written contract or other binding agreement that specifies the terms and conditions of employment, that meet all legal requirements, in a language workers can understand.

**Time given to resolve**

30 days

**Issue title**

524 - Systemic occurrence of workers not being given a copy of their contracts or letter of appointment (including digital copy)

**Verification method**

Desktop audit

**Description**

It was noted during workers interviews that appointment letters were not issued to 05 out of 27 sampled workers at the time of their employment in the factory.

**Area of non-compliance/non-conformance**

Local law  
Base code

**Corrective and preventative actions**

It was agreed by the factory management that they will provide the appointment letter to their all employees.

**Local law reference**

Local law Ref. Industrial and Commercial ordinance 1968 Section 2 Sub Section 2-A Terms and conditions of service to be given in writing.– Every workman at the time of his appointment, transfer or promotion shall be provided with an order in writing, showing the terms and conditions of his service.

\* PDF generated at 15:21 (UTC) on 19 May 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

8. Regular employment is provided

## Data points

Percentage of workers that are permanently or temporarily employed	100.0%
--	--------

Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
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Percentage of workers employed as apprentices, trainees or interns	0.0%
--	------

## 8.A. Sub-contracting and homeworkers are used responsibly

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed policy and procedure on "Sub-contracting and homeworkers". All the policies and procedures are in line with local law and ETI COC. There are no Sub-contracting and homeworkers are used by factory.</p> <p>Resources: Grade: Robust Factory has hired a responsible person to make sure that no sub contractors are used by factory.</p> <p>Communication and Training: Grade: Robust Factory has provided trainings to the responsible persons and trainings and factory is taking feedback from workers regarding trainings.</p> <p>Monitoring: Grade: Robust Factory is making sure that they don't use sub contracting and home working by conducting internal and external audit.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

**System:**

1. As confirmed by the factory management and as observed during the factory visit it was confirmed that the factory has all the production process in-house.
2. Verified through document review, factory tour, management interview and employee interview that no sub-contracting & Home-working was used by this factory.

**Evidence:**

1. Production process flow diagram
2. Inward and Outward receipts
3. Subcontractor policy
4. Internal audit records for subcontractor

## 8.A. Sub-contracting and homeworkers are used responsibly

### Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?  
No  
Not applicable

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?  
No  
Not applicable

Are any sub-contractors used? No

## 9. No harsh or inhumane treatment is allowed

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed policy and procedures on no harsh or inhumane treatment is allowed and complaint and suggestion policy and all the policies are inline with local law and ETI COC.</p> <p>Resources: Grade: Robust Factory has hired a responsible person to implement policy and procedures the duty of responsible person is to resolve workers complaint and concerns factory has developed grievance / complaint procedure / policy for their factory employees.</p> <p>Communication and Training: Grade: Robust Factory has provided trainings to all of their employees on no harsh or inhumane treatment and trained their workers on how to lodge complaints and suggestions in case of grievances by posting complaint registering procedure with complaint box.</p> <p>Monitoring: Grade: Robust Factory has mechanisms to monitor complaints and grievances lodged by workers and timely taking action.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

**System:**

- 1) As per the interviewed employee's testimony, all employees are treated with dignity and respect and there were no signs of physical abuse, sexual or other harassment and verbal abuse.
- 2) Factory has policy of progressive disciplinary action and no physical and mental abuses are used as disciplinary measures.

**Evidence:**

1. Social Policy Manual
2. Disciplinary Policy
3. Personal Files (27 personnel files were checked for proof of identity documentation).
4. Payroll records of 27 sample workers.

9. No harsh or inhumane treatment is allowed

## Data points

**Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?**

Yes, there is a formal grievance process  
 The grievance process is available to all workers  
 The grievance process is available to members of the local community

**What type of grievance mechanism(s) are available?**

Factory does have a joint work council committee who were responsible to collect workers feedback and grievance of them, additionally factory has installed complaint / suggestion boxes in all over the factory for seeking the workers grievances.

**Number of grievances raised in the last 12 months** 0

**Number of grievances resolved in the last 12 months** 0

## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policy and procedure: Grade: Robust Factory has developed policy and procedure on environment and all the policies and procedures are in line with local law and ETI COC.</p> <p>Resources: Grade: Robust Factory has hired a responsible person to implement policy and procedures. The responsible person to take all the applicable and license and permits for environment.</p> <p>Communication and Training: Grade: Robust Factory has provided trainings to all of their employees on environmental policy and factory has trained their workers on how to report environmental issues.</p> <p>Monitoring: Grade: Robust Factory is implementing robust management in environment by conducting internal and external audits within their premises.</p>

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

**System:**

1. The factory has environmental management system in place as per nature of its operation to comply with local laws regulations. Training programs are available on environmental laws, chemical safety and handling, waste management and material safety. Training records are verified.
2. Solid waste was identified and segregated as per solid waste management program. Local laws and regulations displayed on the notice board. As applicable to the factory processes, the management communicates to the employees the relevant local environmental laws and regulations through awareness sessions.

**Evidences:**

1. The factory had written environmental policy.
2. Chemical inventory
3. Waste discharge
4. Waste management
5. MSDS
6. Chemical safety
7. Environmental approvals

## 10.A. Environment 2-Pillar

### Data points

<p>Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>The site does not have any valid environmental and energy management certificates</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>Yes The factory has develop plans to implement adaptive measures to protect workers from climate change impacts and factory has developed environmental aspects and impact analysis.</p>

## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>System: Factory has established environmental policies and environmental management system. The facility has a proper practice to handle the waste of the factory. The overall cleaning condition of the facility is satisfactory.</p> <p>Evidences:</p> <ol style="list-style-type: none"> <li>1. Energy consumption record</li> <li>2. Environmental policy.</li> <li>3. Waste Records</li> <li>4. Waste Outward Gate pass</li> <li>5. Aspect impact Analysis Reports</li> </ol>		

## 10.B. Environment 4-Pillar

### Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?

Yes

What additional specific environmental policies does the site capture?

Packaging optimization  
Responsible use and management of water  
Prioritising local suppliers  
Circular economy and resource efficiency  
Sustainable material sourcing

Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?

Not Applicable

Does the site have reduction targets in place to manage climate related risks?

None

Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?

No

Has the site 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?

Not Applicable

### Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	6,348	66,768
Total electricity consumption from renewable sources (kWh)	71,662	Data not available
Sources of renewable energy used	Onsite generated	None

Types of renewable energy used	Solar	Solar Other (provide details) None
Total natural gas consumption (kWh)	Data not available	Data not available
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	Ground Water	Ground Water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	781	711
Water discharged	Municipal Drain	Municipal Drain
Water volume discharged (m3)	676	691
Water volume recycled (m3)	0	0
Total waste produced (mt)	1,890	1,940
Total hazardous waste produced (mt)	1	1.5
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	98	90

## 10.C. Business ethics

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The management system's approach to business ethics is well-structured. However, it could benefit from updating ethics policies to address emerging issues and best practices, refining procedures to ensure clear implementation and enforcement, and expanding training programs to cover the latest ethical standards and scenarios. Facility shall also conduct assessment to assess the risk regarding business ethics at the facility.

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>System:</p> <ol style="list-style-type: none"> <li>Bribery and anti-corruption policy.</li> <li>Ethics and integrity policy communication record with workers.</li> <li>Training records.</li> </ol> <p>Evidences:</p> <ol style="list-style-type: none"> <li>Bribery and anti-corruption procedure and policy are documented and implemented.</li> <li>Factory management is responsible to implement the business.</li> <li>Practices on ethics and integrity procedure.</li> <li>Trainings on ethical Business Practices are arranged.</li> <li>Relevant staff has been trained on what action to take in the event of an arising in their area, which include requirement on ethical business practices.</li> </ol>		

10.C. Business ethics

## Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

Factory does not have any certificate related to anti-bribery management system although factory has conducted risk relate to business ethics and factory has provided trainings related to business ethics to their employees.

## Attachments



[25PAK-1410191 Legal Document.pdf](#)



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