

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 and 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 code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and 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
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 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 details

Site details

Sedex site reference	ZS1000079540	Site name	WONDER PAC
Business name	WONDER PAC	Site address	131028 PLOT NO 234-235 PH IV SECTOR 57 HSIIDC INDUSTRIAL AREA , KUNDLI, SONIPAT HARYANA, IN

Audit details

Sedex company reference	ZC5000067026	Auditor company name	DQS CFS GmbH
Audit company address	August-Schanz-Str. 21, Frankfurt/M, DE, 60433		
Date of audit	2025-08-27	Audit conducted by	Bejoy Gupta
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		
Time in and out	Day 1		
	In	09:15	
	Out	17:30	
Audit type	Full initial		
Was the audit announced?	Semi announced		
Was the Sedex SAQ available for review?	Yes		

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Who signed and agreed CAPR? Mr.Prem Sinh / Manager-Human Resource

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There is no union present in the factory.		
Reason for absence during the audit	There is no union present in the factory.		
Reason for absence at the closing meeting	There is no union present in the factory.		

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)

This is semi-announced audit with window period starting from Aug 25, 2025, to Sept 24, 2025

Lead auditor	Bejoy Gupta	APSCA Number	21704121
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Additional auditor	Anisur Rahaman	APSCA Number	21701376
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Date of declaration	2025-08-27
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Site representation


Declaration	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.
Full name	Mr.Prem Sinh
Title	Manager-Human Resource
Date of declaration	2025-08-27


Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601099853
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099844
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099845
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099846
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099847
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099851
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF601099848
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF601099849
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF601099850
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law Base code	NC ZAF601099852


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

[← Summary of findings](#)


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	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	ZC5000067026	
Sedex site reference	ZS1000079540	
Company name	WONDER PAC	
Business ownership type	GOODS	
Site name	WONDER PAC	
Site name in local language		
GPS location	GPS address	PLOT NO 234-235 PH IV SECTOR 57, HSIIDC INDUSTRIAL AREA, KUNDLI, SONIPAT, HARYANA
	Coordinates	Longitude-28.5214.3 N, Latitude- 77.0724.2 E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr. Prem Singh
	Job title	Manager-Human Resource
	Phone number	+91 7404765107
	Email	rishabh@wonderpacindia.com

[← Management systems](#)

[Worker analysis →](#)

Company and site details

Applicable business and other legally required business license numbers and documents

Facility License - SPT-ONLINE-CHD-W-115, Manpower – 50 HP- 334, Issued By: LABOUR DEPARTMENT HARYANA Valid Up to: 31st Dec 2026.

GST: 06AAAFW3161G1ZE dated: 01/07/2017.

Fire License:No. 18131222301208 Valid up to: 18.09.2026 Issued By: Assistant Divisional Fire Officer/Fire Station Officer MC Sonipat.

HSPCB Approval Air & Water:No. HSPCB/Consent/:3131280255SONCTO108479434, Orange Category.

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Printing
	Secondary	Service activities related to printing
	Other	
Product type	Manufacturing of Labels/self-adhesive stickers, Shrink, Pouches.	
Process overview	<p>Design, Material Selection , Printing, Lamination, Cutting, waste removal, QC, Packing, Dispatch</p> <p>Machine List- Flexo-4, digital-2, lamination-2, flat bed manual die cutting-4, rotary die cutting-3, Slitting -5, air compressor-2, digital die cutting (plotter)-2, Dg set-2 (80, 125 KVA), 1 goods lift-1, Embossing-2</p> <p>Monthly capacity-3 lakh square meters</p> <p>Running capacity- 75%</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?	900m ²

[← Site details](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2015
	If building is shared, provide details	NA
	Number of floors	5
	Description of floor activities	Ground floor- Raw material store, Printing, Cutting, DG set, Compressor First floor-Office, Printing, Cutting, Slitting, Lamination Mezzanine 1: Digital Printing Mezzanine 2: Packing, Embossing Second floor: Printing. Periphery - security cabin and utility.

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 applicable
worker transport not provided and not legally required.

[← Site details](#)

[Worker analysis →](#)

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? ISO 45001 (OHS), ISO 14001 (Environmental management), Other certification
ISO-45001-BMS certification-04 Dec 2023-04 Dec 2026
ISO-14001-BMS certification-04 Dec 2023-04 Dec 2026

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
The site has not been assessed for negative impacts on human rights, lands, resources, territories, livelihoods.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
No Human Rights Impact Assessment done.

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	39 (88.6%)	5 (11.4%)	- -	44 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	39 (88.6%)	5 (11.4%)	- -	44 (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

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	30 (85.7%)	5 (14.3%)	- -	35 (79.5%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	30 (85.7%)	5 (14.3%)	- -	35 (79.5%)

* % of total workforce

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

Workers by age

	Men	Women	Other	Total
18 - 24 years old	14 (73.7%)	5 (26.3%)	- -	19 (43.2%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

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 Indian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	89%	11%	-	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	39 (88.6%)	5 (11.4%)	- -	44 (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	39 (88.6%)	5 (11.4%)	- -	44 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details NA

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	3 (60%)	2 (40%)	- -	5
Supervisors or team leaders	4 (100%)	0 (0%)	- -	4
Administrative staff	3 (60%)	2 (40%)	- -	5

[← Worker analysis](#)

[Worker interviews →](#)

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 1 group of 5 workers

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)

No Complaint Received.

What did the workers like the most about working at this site?

Communication (e.g. from management)
 Equal opportunities
 Freedom of movement
 Grievance mechanisms
 Hours worked, rest days or breaks
 Job security
 Pay
 Training and development

Additional comments

All interviewed workers informed they were happy working there. They confirmed that no overtime work was done in the factory. The interviewed stated that a functional ICC was place in the factory.

Attitude of workers' committee/union representatives

Grievance Committee members stated that the management never interfered in their work. The management encouraged the worker representatives to bring any grievance to their notice.

Attitude of managers

The attitude of the managers was positive. They informed that honesty and transparency were the key requirements for a successful SMETA Audit. The management was cooperative throughout the audit. In the closing meeting, the managers acknowledged the findings and agreed on the CAP. They assured that the issues identified would be addressed timely.

Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	5	0	-	5
Workers interviewed individually	4	1	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	7	1	-	8
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	7	1	-	8

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2024)	1.0%	1.0%	-	2.0%
Previous full calendar year (2023)	1.0%	2.0%	-	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)	2.0%	2.0%	-	4.0%
Last full calendar year (2024)	2.0%	3.0%	-	5.0%
Previous full calendar year (2023)	1.0%	3.0%	-	4.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded? Yes

The factory had maintained accident books in Forms 26 & 15 as per local laws requirements. No accidents had occurred till date.

[← Worker interviews](#)

[Code area 0 →](#)

Annual number of work related accidents and injuries (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 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%

[← Worker interviews](#)

[Code area 0 →](#)

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

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%
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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%
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
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>A) The factory welcomed the auditors and assured complete support to conduct the audit.</p> <p>B) The auditors were not offered any bribe and gifts during the audit.</p> <p>C) The site description matched the details as per the SAQ and factory information provided.</p> <p>D) The factory had a written policy on Human Rights and the HR Manager had communicated the policy and requirements to all the employees on 17.07.2025 & 17.04.2025.</p> <p>Evidence examined:</p> <p>i) Human right policy no. WP/HR/HR/P020 dated 01.01.2025.</p> <p>ii) Interaction with management and workers, Site Tour, Anti bribery policy, SAQ, Training on Human rights records.</p>		

0. Enabling accurate assessment

Data points

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

Did any workers selected by the auditor decline to be interviewed? No

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

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

The facility has policy of Recruitment Policy - WP/HR/RP/P002 dated 01.01.2025, the policy defines the process of the employees being hired to manage this issue at the site includes all relevant requirements of the code area. The policy includes the procedure for hiring of contracted & migrant workers if any. The facility has forced labour policy also in place.

Resources: Robust

The HR Manager was the responsible person for implementation and monitoring of the code. The HR manager is aware of the requirements under the code, the responsibility is includes handing over the charge in case of leave or absent of the HR Manager.

Training and Communication: Robust

The employees are well communicated about social related issues like forced labour, bonded labour, etc. The employees confirmed that no illegal deposits to be deposited to the facility for recruitment and they are free to resign from the facility after serving a specified notice period. All the employees are provided periodic trainings as per the training calendar apart from the induction awareness provided during hiring. The training plan also include retraining to employees absent in the provided training and also to employees not meeting the desired result.

Monitoring: Robust

The facility HR manager regularly review the policies and ensure that it is adhered to any deviation or gaps identified are immediately addressed as per the internal audit and feedback received. As such the facility has robust management system.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 0](#)

[Code area 1.A →](#)

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

Current System:

- A) The factory had a policy which prohibited the use of forced labor. Policy No. WP/HR/FL/P008 dated 01.01.2025. The policy was available for review.
- B) There was a procedure which required all workers to present their personal identification documents for proof of age, but only copies would be kept in their personnel files and the originals were given back to the workers.
- C) The terms and conditions of employment in the appointment letter stated that the workers were free to leave the workplace outside of their work hours.
- D) The factory did not require any payment for work tools, PPE, IC/staff card, training, etc. or any kind of deposits.
- E) The factory did not use prison labour.
- F) All the above was also confirmed during management and employee interviews.
- G) The Manager HR was responsible to oversee that no forced, bonded, involuntary or prison labour is employed.

Evidence Examined:

- i) Personnel files including employment contracts for all the 10 sampled workers.
- ii) Resignation records and final settlement records
- iii) Factory rules
- iv) Employee handbook
- v) Management and employee interviews.
- vi) All Policy

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

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

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

The facility has policy of Recruitment Policy: WP/HR/RP/P002 dated 01.01.2025 the policy defines the process of the employees being hired to manage this issue at the site includes all relevant requirements of the code area. The policy includes the procedure for hiring of contracted & migrant workers.

Resources: Robust

The HR Manager was the responsible person for implementation and monitoring of the code. The HR manager is aware of the requirements under the code, the responsibility is include handing over the charge to another responsible person in case of leave.

Training and Communication: Robust

The facility has training plan apart from the induction training provided to the new employee, the plan involved periodic training to all the employees and refresher training to the absent employees.

Monitoring: Robust

The management system is adequate to ensure effective implementation of the policies, the management through internal audits & management review meetings ensure that any deviation from the setup policies and procedure are promptly addressed and implemented into the system, as such the management system is robust.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 1](#)

[Code area 2 →](#)

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

Current System:

- A) All the workers are permanent.
- B) The appointment letters in the local languages issued to the workers contain all the terms and conditions.
- C) The workers are recruited by the word of mouth and with references.
- D) No recruitment fees were charged from the workers as inferred from the workers' interview.
- E) The factory provides induction training to all the new employee on the terms & conditions of the employment, factories rules & regulations and other details of working in the factory.
- F) There are 79.5% migrant workers.

Evidence Examined:

- i) No agency was used in facility's for recruitment process
- ii) Hiring Policy No. WP/HR/RP/P002 dated 01.01.2025 reviewed
- iii) Duties and responsibilities of the Factory Manager and HR Manager
- iv) Personal files

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? Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site? No

[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 79%

Do any workers migrate from other states, provinces or regions within the country to work at this site? Yes

List the sending states/provinces/regions BIHAR AND UTTAR PRADESH

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

The workers are directly hired by the factory. As observed during the review of the personal files, interaction with management and workers testimonials. No recruitment fees is charged.

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

Management systems

Explanation for management systems grades

Policies and Procedure: Robust

The facility has Policy on Freedom of Association & Collective Bargaining, Policy No. WP/HR/CB/P005 dated 01.01.2025 & Grievance handling policy and Procedures WP/HR/CG/P011 dated 01.01.2025. The policy includes the process for the election of the worker representative, their tenure and responsibilities & also making aware the employees about the functioning of different committees and their representatives.

Resources: Robust

The HR manager of the facility is the responsible person for the implementation of the code & he is well aware of the requirements under the code based on the interaction & knowledge of the code.

Training and Communication: Robust

The factory provides training about the functioning of the different committees and the grievance handling mechanism to all the employees, worker representative were effectively trained on their roles and responsibilities.

Monitoring: Robust

The facility has a robust system, during operative personnel interviews, it is confirmed the employer adopts an open attitude towards the activities of committee and their organizational activities. Also confirmed: Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 1.A](#)

[Code area 3 →](#)

Systems and evidence examined to validate this code section

Current System:

- A) Policy on Freedom of Association and Collective Bargaining No. WP/HR/CB/P005 dated 01.01.2025.
- B) Grievance handling policy and Procedures No. WP/HR/CG/P011 dated 01.01.2025.
- C) The factory had no worker union, but workers were free to join any union, if they wished. As confirmed in both management and worker interviews, the employees were free to form unions or join any associations. No one would be treated differently because of their membership status of the union.
- D) The members of the Grievance committee were elected through ballot paper on 01.01.2024 and members were elected for a term of two years, there are 3 members from the workers side (Including 01 female employee) and 3 members from the management side. Committee meeting held every 3 months; last meeting was held on 19.08.2025 & 14.06.2025.
- E) The factory had provided training on the subject matter on 05.08.2025.
- F) The factory management had provided a suggestion box for the workers to lodge in their complaints / grievances or share their suggestions.

Evidence Examined:

- i) Policy on Freedom of association and collective bargaining
- ii) Grievance handling policy and Procedures
- iii) Suggestion box opening log and suggestion box complaint feedback
- iv) Employment contracts were reviewed
- v) Employee and management interviews
- vi) Election records
- vii) Committee meeting minutes

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?	Yes
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

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

Policies and Procedure: Robust

The Facility has Health and Safety Policy, policy no. WP/HR/H&S/P010 dated 01.01.2025, the policy is reviewed once in a year. The policy includes providing training and awareness of the health & safety and working requirement in the facility and also to visitors, the policy clearly elaborate in case deficiency or GAP is identified the corrective action to be imparted.

Resources: Robust

The facility has designated the HR Manager for the implementation of the procedures and requirements under the code. The HR Manager is also responsible for the Health & Safety Assessment and also the emergency preparedness that includes fire safety, natural calamities, chemical handling etc. The Operation Manager is well supported by a Health & Safety team, and he is responsible for effective implementation of the requirements under the code. The responsibility mention incase of leave or absence of the HR Manager and the next person(Operation Manager) to look after Health & Safety related issues.

Training and Communication: Some Improvements Recommended

The facility provides regular training on Health & Safety policy and its requirements, other Health & Safety issues and proper hygiene. The facility has training and observation plan & it is implemented however some issues related to Health & Safety was observed during the audit. As such more training is required to be provided.

Monitoring: Some Improvements Recommended

The facility has a procedure in place to regular monitoring of health and safety requirement. However, some issues related to health and safety were noted during site tour, these reflects insufficient monitoring and training and the KPI defined for the health and safety condition based on the number of accidents, number of near misses, Safety audits, Health and safety NC in internal and external audits, mock drills.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

[← Code area 2](#)

[Code area 4 →](#)

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601099853
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099844
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099845
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099846
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099847
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601099851
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF601099848
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF601099849
	3.N Maintain a log of all hazardous substance...	Local law Base code	NC ZAF601099850

[← Code area 2](#)

[Code area 4 →](#)

Systems and evidence examined to validate this code section

Current System:

General Health & Safety

- A) The HR manager is the Health & Safety responsible person.
- B) The factory has provided potable drinking water facility, regular tests are conducted, the latest test was conducted on 07.08.2025 by Arihant Analytical Laboratory Pvt.
- C) Clean and adequate toilet facility is provided for the male employees with proper segregation (03-Male toilets, 10-Urinals & 02-Female).
- D) Ventilation, temperature and lighting was adequate, the factory arranges for the air ambient, noise and light test periodically, the last test was done on 07.08.2025 by Arihant Analytical Laboratory Pvt.
- E) Minutes of meetings show that there are meetings between the workers and the Facility management, and each point is acted on. The HSE meeting was done on 18.08.2025 & 14.06.2025, there are 3 member from the workers side (Including 01 female worker) and 3 member from the management side.
- F) Health and safety risk assessment on 01.01.2025, Document No. WP/HIRA-01, covering all the parameters like fire safety, natural calamities, production process etc.
- G) There are no company provided transport as per the workers come from nearby places, and it is not a legal requirement.
- H) There is no dormitory in the facility & this is not legally required.
- I) Creche room located at ground floor.
 - During facility tour, it was noted that about 20% workers in printing and colour kitchen section involved in handling chemicals were not using provided appropriate personal protective equipment (PPE) such as respiratory mask, safety apron, hand gloves and safety boot corresponding to their work hazard.

Fire Safety

- i) There were 2 exits from each work area.
- ii) Fire NOC: No. 18131222301208 Valid up to: 18.09.2026
Issued By: Assistant Divisional Fire Officer/Fire Station Officer MC sonipat.
- iii) Firefighting equipment, such as fire extinguishers (40 Nos), Hydrant Point (02 Nos), Emergency Lights (06 Nos), Fire alarm call point (06 Nos), Smoke Detector (11 Nos), First Aid boxes (04 Nos) were provided in the facility.
- iv) There are 10 trained fire fighters, training provided on 23.06.2025 & 23.04.2025 by Fire Deal.
- v) Fire drills were conducted once every 2 months. The last 02 drills were conducted on 23.06.2025 (Participant Employees- 36, Evacuation- 152 sec), & 23.04.2025 (Participant Employees- 34, Evacuation- 148 sec) through Fire Deal.
 - During documentation review, it was noted that the Fire Safety Certificate dated Sept 19, 2022 (Valid till Sept 18, 2025) issued by the Fire Department for the facility building did not include the 2nd and 3rd floors of the facility.

- During the facility tour, it was noted that emergency lighting— standard or industrial grade—was missing at 20% of the exits including staircases across all floors and sections of the factory.
- During the facility tour, it was noted that approximately 30% of the exits throughout the facility were not marked and lighted.
- During facility tour, it was noted that a) The evacuation plan was not posted anywhere in the facility. b) Pathway markings were not present at 30% areas/sections at all floors throughout the facility.
- During the facility tour, it was noted that about 20% exits on each sections/floor are opening inward.

Machine & Electrical safety

- i) There were competent mechanic & electricians at the site to do the electrical work
- ii) Facility had obtained periodic inspection certificate for all the machineries used.
- iii) Rubber mat was provided in front of the electrical panel board.

Medical Services

- i) Facility has provided first aid box in each production area (Total 04 first aid boxes).
- ii) There were 20 first aiders and they had been trained through Red Cross Society on 05.01.2025 valid for three year.
- iii) The accident incident register checked vide form 26 & 15, no accident till date.

Chemical Safety

- i) Chemical room located at ground floor.
 - During the facility tour, it was noted that Material Safety Data Sheets (MSDS) were not posted in the chemical handling and storage areas. However, copies of the MSDS for all chemicals are maintained in the office. Facility uses chemicals such as printing inks, iso propyl alcohol and adhesives.
 - During the facility tour, it was noted that secondary containers were not provided for chemicals in the storage and handling areas such as printing section, color kitchen and chemical store throughout the facility. Facility uses chemicals such as printing inks, iso propyl alcohol and diesel.
 - During the facility tour, it was noted that eyewash stations were not installed anywhere in the facility including chemical storage areas and chemical usage areas such as printing and colour kitchen section.

Training

- i) Training on health and safety on 12.08.2025 & 12.05.2025, PPE on 12.08.2025 & 12.05.2025, Environment & Waste Management on 13.07.2025 & 16.04.2025, Chemical Handling on 13.07.2025 & 16.04.2025, Training on Policies on 05.08.2025 & 07.05.2025, HIRA 13.07.2025, ETI Base code training 05.08.2025 & 07.05.2025.
- ii) There are 60 trained fire fighters, training provided on 23.06.2025 & 23.04.2025 by

Fire Deal.

iii) There were 20 first aiders and they had been trained through Red Cross Society on 05.01.2023 valid for three year.

Evidence Examined:

- i) Health and Safety Policy, policy no. WP/HR/H&S/P010 dated 01.01.2025.
- ii) Health & Safety Committee meeting records
- iii) Fire drill & training records
- iv) Fire fighting equipment inspection records
- v) Machines inspection records
- vi) Accident & Injuries records
- vii) Building stability certificate & approved site plans
- viii) Factory tour
- ix) All H&S documents like policy, procedure, training records
- x) First aid training records
- xi) Risk Assessment
- xii) Test reports like drinking water, noise, ambient air, stack.
- xiii) Health & Safety Training Records
- xiv) Interaction with Management and Interviews with employees

Findings: non-compliances

ZAF601099853

Non-compliance

Due 2025-10-17

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

During facility tour, it was noted that about 20% workers in printing and colour kitchen section involved in handling chemicals were not using provided appropriate personal protective equipment (PPE) such as respiratory mask, safety apron, hand gloves and safety boot corresponding to their work hazard.

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

Facility shall ensure that all employees are using appropriate PPE including respiratory mask, safety apron, hand gloves and safety boot corresponding to their work hazard at sole printing and finishing areas.

Local law reference

In accordance with Factories Act 1948, Section 7A 'General duties of the occupier' (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the facility

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[NC- No Wearing Proper PPE.JPG](#)



* PDF generated at 05:37 (UTC) on 17 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601099844

Non-compliance

Due 2025-10-17

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

172 - Fire licence, inspection or certificates not in place as required by law

Area of non-compliance/non-conformance

Local law
Base code

Description

During documentation review, it was noted that the Fire Safety Certificate dated Sept 19, 2022 (Valid till Sept 18, 2025) issued by the Fire Department for the facility building did not include the 2nd and 3rd floors of the facility.

Corrective and preventative actions

Facility shall amend the fire safety certificate covering all floors of the building,

Local law reference

In accordance with Haryana Municipal Corporation 1994 section 330/331, Factory should obtain No Objection Certificate from local fire department.

[← Code area 3](#)

[Code area 4 →](#)

* PDF generated at 05:37 (UTC) on 17 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601099845

Non-compliance

Due 2025-11-16

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

210 - Inadequate/poorly functioning emergency lighting

Area of non-compliance/non-conformance

Local law

Description

During the facility tour, it was noted that emergency lighting— standard or industrial grade—was missing at 20% of the exits including staircases across all floors and sections of the factory.

Base code

Corrective and preventative actions

The facility shall ensure that emergency lighting—either standard or industrial grade with a secondary power source—is installed in all areas covering exits, pathways and staircases.

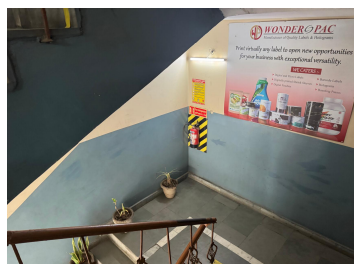
Local law reference

In accordance with The Punjab Factory Rules, 1952 (applicable in the State of Haryana) Rule 66 (9) (e) The exits shall be clearly visible and suitable illuminated with suitable arrangement, whatever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal source of electric supply.

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[NC- Without Emergency Light in staircase.JPG](#)



[NC- No Emergency Light installed.JPG](#)



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ZAF601099846

Non-compliance

Due 2025-10-17

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Issue title

209 - Not all emergency exits are properly marked and lighted

Verification method

Desktop audit

Description

During the facility tour, it was noted that approximately 30% of the exits throughout the facility were not marked and lighted.

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

Facility shall ensure that all exits throughout the facility are marked in local language.

Local law reference

In accordance with Punjab Factories Rules 1952 (applicable to Haryana), Rule 66 (10) (f), all first-aid fire-fighting equipment shall be placed in a conspicuous position and shall be readily and easily accessible for immediate use. Generally, this equipment shall be placed as near as possible to the exits or stair landing or normal routes of escape.

[← Code area 3](#)

[Code area 4 →](#)

Evidence



[NC- Exit Not Lighted.JPG](#)



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ZAF601099847

Non-compliance

Due 2025-10-17

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

214 - No evacuation plan or designated emergency exit route

Area of non-compliance/non-conformance

Local law
Base code

Description

During facility tour, it was noted that a) The evacuation plan was not posted anywhere in the facility. b) Pathway markings were not present at 30% areas/sections at all floors throughout the facility.

Corrective and preventative actions

Facility shall ensure that a) evacuation plan is posted at all areas across the entire facility. b) Pathway marking is done at all areas across the entire facility.

[← Code area 3](#)

[Code area 4 →](#)

Local law reference

In accordance with the Factories Act 1948, Section 38. Precautions in case of Fire-(1) In every Factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintained -a) safe means of escape for all persons in the event of a fire and b) the necessary equipment and facilities for extinguishing fire.

Evidence



[NC- Pathway Marking not done.JPG](#) 

* PDF generated at 05:37 (UTC) on 17 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601099851

Non-compliance

Due 2025-10-17

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

203 - Fire exits are not adequate, causing an elevated risk to life

Area of non-compliance/non-conformance

Local law
Base code

Description

During the facility tour, it was noted that about 20% exits on each sections/floor are opening inward.

[← Code area 3](#)

[Code area 4 →](#)

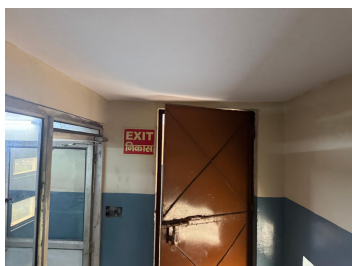
Corrective and preventative actions

Facility shall ensure that all exits are opening inwards in the egress of travel.

Local law reference

In accordance with The Punjab Factory Rules, 1952 (applicable in the state of Haryana) Rule 66 (9) (u) Exit doorways shall open outwards, that is away from the room but shall not obstruct the travel along any exit.

Evidence



[NC- Door Opening inwards.JPG](#)



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ZAF601099848

Non-compliance

Due 2025-11-16

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Code area 3](#)

[Code area 4 →](#)

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

60 days

Issue title

231 - Material safety data sheet (MSDS) is incomplete/inaccurate/not in worker language/not understood by workers

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Description

During the facility tour, it was noted that Material Safety Data Sheets (MSDS) were not posted in the chemical handling and storage areas. Facility uses chemicals such as printing inks, iso propyl alcohol and adhesives.

Corrective and preventative actions

Facility shall ensure that MSDS is posted for all chemicals in the chemical handling and storage areas in the language understood by workers.

Local law reference

In accordance with Factories Act 1948, Section 7A 'General duties of the occupier' (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the facility.

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ZAF601099849

Non-compliance

Due 2025-10-17

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Code area 3](#)

[Code area 4 →](#)

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

Area of non-compliance/non-conformance

Local law

Base code

Description

During the facility tour, it was noted that secondary containers were not provided for chemicals in the storage and handling areas such as printing section, color kitchen and chemical store throughout the facility. Facility uses chemicals such as printing inks, iso propyl alcohol and diesel.

Corrective and preventative actions

Facility shall ensure that secondary containers are provided for chemicals in the storage and handling areas.

Local law reference

In accordance with Factories Act 1948, Section 7A 'General duties of the occupier' (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the facility.

Evidence



[NC- Chemicals without secondary container.JPG](#)



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ZAF601099850

Non-compliance

Due 2025-10-17

[← Code area 3](#)

[Code area 4 →](#)

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

Verification method

Desktop audit

Issue title

242 - No/inadequate eye wash/shower station in hazardous environments including chemical areas

Area of non-compliance/non-conformance

Local law

Description

During the facility tour, it was noted that eyewash stations were not installed anywhere in the facility including chemical storage areas and chemical usage areas such as printing and colour kitchen section.

Base code

Corrective and preventative actions

Facility shall ensure that eye wash station is provided in the chemical storage and handling areas.

Local law reference

In accordance with Factories Act 1948, Section 7A 'General duties of the occupier' (1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the facility.

* PDF generated at 05:37 (UTC) on 17 Sept 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
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)?	Yes Ink.
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes The factory has approved layout plan, plan no. SPT/FBP_1228 Date :- 12.09.2017. The factory also has building stability certificate issued by Mr. Pankaj Agarwal (Chartered Engineer & Competent person) issued on 12.09.2017.
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

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

[← Code area 3](#)

[Code area 4 →](#)

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

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

Facility has Child labor & Child labour remediation policy, policy no. WP/HR/CL/P003 dated 01.01.2025, the policy is reviewed once in 12 months. The policy included not hiring any child worker in the facility, further incase of any underage worker observed then the rehabilitation of the child worker that includes monetary support, education and alternate employment.

Resources: Robust

The HR Manager is the responsible person for the implementation and monitoring of the requirements under the code and the policy, the manager is well aware of the code. As per the policy the HR Manager takes care of the recruitment and the verification of the age proof.

Training and Communication: Robust

The facility provides regular training to all the employees on the policy & all the employees were well aware on the subject, based on the interaction & feedback. The training is based on the training calendar & it involves all the employee and the departments.

Monitoring: Robust

The facility has a robust has management system as they have framed policies and procedures defines roles and responsibilities more. The list of employees along with the date of birth is monitored. There is a board at the main gate prohibiting any employees below 18 years. There is a system in place to monitor the misapplication and the verification of the age proof documents to prevent falsification of the age verification data.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 3](#)

[Code area 5 →](#)

Systems and evidence examined to validate this code section

Current systems:

- A) Based on interaction with the factory management, all employees are hired by the Human Resource Department only.
- B) Based on review of hiring policy documents, employee's ID for age proof such as PAN Card and School Certificate was checked by HR department prior to hiring. The employees without valid ID certificates are not being hired. This was reviewed & found correct.
- C) Based on the policy review, the minimum hiring age of the facility is above 18 years old. The youngest worker was 18 years old.
- D) Based on employees' interview, any suspect of child labor can be reported to facility management.
- E) Based on the employee interviews, review of facility's Anti Child Labor & Hiring Policy and age proof documents, the facility has complied with ILO Standards for Child Labor.
- F) Child Labour & remediation policy- WP/HR/CL/P003 dated 01.01.2025 verified.
- G) The factory had provided training on Child labour policy & remediation policy on 05.08.2025 & 07.05.2025.

Evidence Examined:

- i) Child Labour and Child Labour Remediation Policy
- ii) Personnel records including age proof documents of 10 out of 10 selected samples
- iii) Interaction with Management and Interviews with employees
- iv) Child Labour awareness training record
- v) Factory tour

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	43%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	18
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

[← Code area 4](#)

[Code area 5 →](#)

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

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

Facility has payment of Wages policy, policy no. WP/HR/MWP/P021 dated 01.01.2025, the policy is reviewed once in 12 months. The policy include the process for the maintaining and disbursement of the wages of the contracted & migrant workers if hired, benefits to be provided and the legal deductions.

The minimum wage is displayed.

Resources: Robust

The HR Manager is responsible person for monitoring the policy and taking appropriate steps to implement the same. The manager ensure that wages are paid on time, correctly paid, deduction if any are done correctly, the facility monitors any deviation from the policies. The responsibility include incase of any eventuality the methodology to disburse the wages on time and responsible person on such time.

Training and Communication: Robust

The facility provides periodic training on the wages, calculation, Overtime payment and deductions and benefits is imparted during induction. The workers are aware of the wage calculation based on the interaction. The facility also provides periodic training on the payment of wages, minimum wages, overtime calculation, legal benefits, deductions based on the training plan.

Monitoring: Robust

The facility has a system as they have framed policies and procedures defines roles and responsibilities; The minimum wage notification is displayed near the main gate in the notice board. All wages and payment are through digital method. The control of the timely wages is being. The wages is monitored by the muster roll. The deductions are recorded in the muster roll.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

Current System:

- A) Facility has payment of Wages policy no. WP/HR/MWP/P021 dated 01.01.2025.
- B) The minimum wage is displayed.
- C) The facility transfer the salary before 7th of every month and wage slip also provided to workers in local language, deductions are EPF as per the act requirement.
- D) The factory follows the minimum wages issued by the Government of Haryana. The minimum wages as per the skill classification is Unskilled: INR 11257.12, Semi-Skilled "A": INR 11819.94, Semi-Skilled "B": INR 12410.91, Skilled "A": INR 13031.47 & Skilled "B": INR 13683.06. The wages are effective from 01.01.2025 to 31.12.2025 & also from 01.07.2024 to 31.12.2024 Unskilled: INR 11001.78, Semi-Skilled "A": INR 11551.81, Semi-Skilled "B": INR 12129.38, Skilled "A": INR 12735.86 & Skilled "B": INR 13372.67.
- E) The factory Act Abstract is displayed.
- F) The HR Manager is taking care of the Wage distribution.
- G) The verbal training on the wages, calculation, Overtime payment and deductions and benefits is imparted during induction. The workers are aware of the wage calculation.
- H) The wages are monitored by the muster roll.
- I) The deductions are recorded in the muster roll.
- J) The facility paid annual bonus at 8.33%.

Evidence Examined:

- i) Payroll and attendance records of the sampled months- July 2025 (Current month), January 2025 (random month) and October 2024 (random month).
- ii) Employee interview
- iii) Local and national laws
- iv) Wages and benefits policy
- v) Local legal minimum wage documents
- vi) Employment contracts for all sampled 26 employees
- vii) List of National and Festival Holidays

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? Only digital payments

How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits? None

Worker remuneration

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

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

[← Code area 5](#)

[Code area 5.A →](#)

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	Non applicable
Actual overtime hours	Max hours per day	0.0
	Max hours per week	0.0
	Max hours per month	0.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	433.0
	Min per week	Non applicable
	Min per month	11257.12
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	11258.0
Minimum legal overtime wage	Min per hour	108.24
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual minimum overtime wage	Actual per hour	0.0
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	10
Provide the date and details of the records	The factory provided records for review from July 2024 to June 2025, for detailed review the sampled months of July 2025 (current month), January 2025 (random month) & October 2024 (random month).
Are there different legal minimum/ legally recognised CBAs wage grades?	<p>Yes</p> <p>The factory follows the minimum wages issued by the Government of Haryana. The minimum wages as per the skill classification is Unskilled: INR 11257.12, Semi-Skilled "A": INR 11819.94, Semi-Skilled "B": INR 12410.91, Skilled "A": INR 13031.47 & Skilled "B": INR 13683.06. The wages are effective from 01.01.2025 to 31.12.2025</p>
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	100% of the workers are paid wages equal to the minimum wages as per the skill category. The lowest wages in the factory is INR 11258.
Are there any bonus schemes used?	<p>Yes</p> <p>The facility paid annual bonus at 8.33%.</p>
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

[← Code area 5](#)

[Code area 5.A →](#)

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current System:</p> <p>A) Facility has payment of Wages policy WP/HR/MWP/P021 dated 01.01.2025.</p> <p>B) Based on the calculation done by the factory the living wages are more than the legal minimum wages which comes to approximately INR 9084 calculated by using (Anker Methodology) on 15.05.2025, And the lowest wage given by facility is INR 11258 & take home after deduction is INR 9814. The living wages were calculated taking into consideration elements like total number of earning people in a family, wages, dependents, house expenses, transport expenses, education expenses, medical expenses, saving & other expenses.</p> <p>C) The living wages were calculated taking into consideration elements like total number of earning people in a family, wages, dependents, house expenses, transport expenses, education expenses, medical expenses, saving & other expenses.</p> <p>D) The minimum wage is displayed.</p> <p>Evidence Examined:</p> <p>i) Payroll and attendance records of the sampled months- July 2025 (Current month), January 2025 (random month) and October 2024 (random month).</p> <p>ii) Living Wages calculation records.</p> <p>iii) Employee interview.</p> <p>iv) Local legal minimum wage documents.</p>		

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

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

Facility has policy on working hours & overtime WP/HR/WH/P012 dated 01.01.2025. The policy includes monitoring and managing the attendance of all the employees, incase of dispute the contact person to resolve the matter, the policy include the process of recording the attendance incase discrepancies is observed in the bio-metric attendance recording system.

Facility has Leave policy WP/HR/WH/P012 dated 01.01.2025. The leave record is maintained.

Resources: Robust

The HR manager is the responsible person for the implementation and monitoring of the policy under the code. The HR manager is well aware of the requirements, the responsibility include the process of incase non-availability of the HR manager the person looking after the matter.

Training and Communication: Robust

There is induction training on the working hours, overtime, leaves given to the employees. The workers are aware of the working hours and weekly off. The facility has displayed the working hours policy at the main entrance of the facility. The facility has provided sufficient rest breaks to all the workers. The facility has provided regular training on working hours and found effective.

Monitoring: Robust

Facility has robust management system as they have framed policies and procedures defines roles and responsibilities. The workers are aware of the working hours and weekly off. The working hours is maintained in the manual attendance system. There is Overtime register to monitor the overtime. The KPI for the working hours is defined. The employees working hours, absenteeism is monitored.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area

Workplace requirement

Area of NC

Finding

[← Code area 5.A](#)

[Code area 7 →](#)

No findings

Systems and evidence examined to validate this code section

Current System:

1. In this audit, auditor had randomly selected production record, such as: Material in/out records, daily production reports, and crosschecked these records with payroll records and attendance records, no inconsistency was noted. In addition, through employee interview, no inconsistency was noted either.
2. Based on provided attendance records, the working hours analysis as below:
 - a) During employee interview, all the 10 randomly selected employees stated that they do not work overtime. The overtime if any is paid @200% of the standard wages.
 - b) The facility has electronic system to record IN/OUT time recording for all the employees. Based on the provided attendance records, the no overtime hours worked
3. The facility works in single shift (9:30 to 18:15), break hours were from 13:00 to 13:30 hours, two tea breaks from 16:00 to 16:15, weekly off Sunday.
4. The working hours is displayed as seen during the site tour.
5. In the appointment letters the working hours is mentioned.

Evidence Examined:

- i) Working hours & Overtime Policy - WP/HR/WH/P012 dated 01.01.2025.
- ii) Time records of 10 sampled workers of July 2025 (current month), January 2025 (random month) and October 2024 (random month).
- iii) Attendance records (Muster roll).
- iv) Leave records vide Form 14.
- v) Interactions with management and employees.
- vi) Employees' contracts
- vii) Facility's working hours policy
- viii) Production 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?	N/A, no overtime work observed in the sampled months, however the factory has a policy to compensate overtime working at 200% of the regular wages.
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

Management systems

Explanation for management systems grades

Policies and procedure: Robust

The factory has Anti-Discrimination policy WP/HR/DP/P004 dated 01.01.2025 on hiring, compensation, promotion and access to training was available during the audit. Based on a review of the wage records and employee interviews, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement. The facility employs employee across all the genders and efforts are in place to hire female employee.

Resources: Robust

The HR Manager was responsible implementation and monitoring of the code, for the investigation and disposal of discrimination cases. The HR manager is well aware of the different laws in the matter.

Based on a wage records review, the facility provided the same pay for employees doing work of the same or similar nature. There was no evidence of discrimination. The site has communicated the policies to its workforce and relevant persons.

Training and Communication: Robust

The facility has a training plan and provides regular & periodic training to the employees on the policy based on the plan, the plan also includes providing retraining to employees absent in the training provided and those not aware of the requirement.

Monitoring: Robust

The policy has a robust management system to ensure no discrimination takes place. They monitor that there is no discrimination through constant feedback and interaction with the employees. Any complaints is immediately addressed and takes steps to ensure reoccurrence of the same does not happen.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 6](#)

[Code area 8 →](#)

**Systems and evidence examined to
validate this code section****Current System:**

- A) Based on a review of the wage records and employee interviews, no discrimination was noted in hiring, compensation, access to training, promotion, termination or retirement.
- B) The HR Manager was responsible for the investigation and disposal of discrimination cases.
- C) Based on a wage records review, the facility provided the same pay for employees doing work of the same or similar nature.
- D) No employee was required to have an examination for the hepatitis B virus and/or HIV.
- E) An anti-discrimination procedure on hiring, compensation, promotion and access to training was available during the audit. The factory encourage female workers & employee to join, they have proper policy in place for female workers.

Evidence Examined:

- i) The factory's Non Discrimination policy, policy no. WP/HR/DP/P004 dated 01.01.2025.
- ii) Time In and Out records
- iii) Personnel files including appointment letter with terms and conditions for 10 out of 10 selected samples
- iv) Salary and other benefit records
- v) Training records
- vi) Appraisal records
- vii) Termination records
- viii) Bonus Records
- ix) Loan records
- x) List of Holidays
- xi) Application forms
- xii) Medical records
- xiii) Interactions with management and employees

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) 40%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 0%

Three most common nationalities in managerial and supervisory roles INDIAN

8. Regular employment is provided

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

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

The facility has Regular employment (hiring) policy, policy no.: SG/PM/012 dated 01.01.2025, the policy is reviewed on yearly basis. The states that employment will be provided to all irrespective caste, colour and creed and gender. Females are also welcome and provided equal opportunity in employment. The policy also states for the contracted workers. Individual agreements are included in every personnel file, also a copy of the contract is delivered to all the employees. Based on interactions with the facility's management, no casual, agency and apprentice employees were engaged.

Resources: Robust

HR manager is the responsible person for implementing and monitoring of the code. The responsibility also indicates for the contracted workers. Based on interactions with the employees, no recruitment fees were required at any stage of the recruitment process.

Training and Communication: Robust

The sampled workers confirmed that they were issued appointment letter and also were explained the terms & conditions of the employment during induction training.

Monitoring: Robust

Factory has implemented all those policies and procedures in the factory premise though periodic training and monitoring by a senior manager. However effective monitoring through regular review of the employment records, agreement with the contractor is required in case of contracted workers if any are hired, to ensure that the policy is implemented.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 7](#)

[Code area 8.A →](#)

**Systems and evidence examined to
validate this code section****Current System:**

- A) Individual agreements are included in every personnel file, also a copy of the contract is delivered to all the employees.
- B) Based on interactions with the facility's management, no casual, agency and apprentice employees were engaged.
- C) Based on interactions with the employees, no recruitment fees were required at any stage of the recruitment process.
- D) The sampled workers confirmed that they were issued appointment letter and also were explained the terms & conditions of the employment during induction training.
- E) Social Security benefits are provided, according to individual agreements and payroll records reviewed. No illegal deductions and fees were found during documental review.

Evidence Examined:

- i) The facility's Regular Employment (Hiring) policy WP/HR/RP/P002 dated 01.01.2025.
- ii) Appointment letter with terms and conditions for all the selected 26 samples workers.
- iii) Salary and other benefit records
- iv) Interaction with management and employees

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%
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

Management systems

Explanation for management systems grades

Policies and Procedure: Robust

The facility has a sub-contracting policy, policy no. WP/HR/SC/P022 dated 01.01.2025, the policy is reviewed on yearly basis. The facility does not outsource any production process. Being seen as inferred from the production record, gate pass, Management interview and site tour. The policy provides the process to address the GAP identified during the internal audit at the sub-contracted facility if any.

Resources: Robust

The Operation Manager & the production manager was responsible person for implementing and monitoring of the code. The production manager is well aware of the sub-contracting process and the required procedure to be taken.

Training and Communication: Robust

The facility management system in place as they have framed policies and procedures defines roles and responsibilities. Facility has implemented all those policies and procedures in the facility premise though periodic training and monitoring by a senior manager.

Monitoring: Robust

Facility has system in place as they have framed policies and procedures defines roles and responsibilities. Facility has implemented all those policies and procedures in the facility premise though periodic training and monitoring by a senior manager. The facility management strongly ensure that there is no deviation from the policies and proper and effective measures like equality for all is followed.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 8](#)

[Code area 9 →](#)

**Systems and evidence examined to
validate this code section****Current System:**

Through the management interview, workers interview. facility does not outsource any production process. Verified through document review, factory tour, management interview and employee interview that no Homeworking was used by this factory. The facility checks the suppliers for the use of home workers through suppliers' audit.

Evidence Examined:

- i) The facility's Sub-contractor policy WP/HR/SC/P022 dated 01.01.2025.
- ii) Inward and outward material register
- iii) Production records
- iv) Goods/ Vehicle movement registers
- v) Interactions with management

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

The factory does not use any suppliers or sub-contractors that buy any products from the home workers. The factory audits the supplier facility to ensure that no products are sourced through home workers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No No undeclared sub-contracting or unrecorded work was observed, as per the production records, personal files, materials issuance and receipt records, management interaction & workers testimonials.
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Are any sub-contractors used?	No
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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

Management systems

Explanation for management systems grades

Policies & Procedures: Robust

The facility has an Disciplinary Policy & Anti-Harassment policy, policy no. WP/HR/DP/P006 & WP/HR/SH/P014 dated 01.01.2025. The states that no form of Harassment be it mental, physiological, physical etc will be tolerated and any employee found practicing or supporting such act, severe disciplinary action in accordance with law will be taken. There are no apparent concerns regarding any forms of abuse at the facility, as per employee and management interviews.

Resources: Robust

The HR manager is responsible person for implementing and monitoring of the code & he is well aware of the requirements under the code like Industrial Dispute Act. the policy mention in case the HR manager is NOT available the other responsible person factory manager to whom the grievance can be raised.

Training and Communication: Robust

All forms of discipline are formally documented in line with local legal requirements. Facility has established the standing order to define the employment terms, misconducts and disciplinary action procedure.

Grievance procedure has been communicated to the workers.

Facility has formed the Grievance Committee to handle work related the grievances. The facility has training plan and provides training to all the employee about different committee and grievance mechanism as per the plan, workers were aware of the Grievance Handling Procedure.

Monitoring: Robust

The facility has a system, as the employees can raise grievances with the management, the grievances are recorded and addressed in a timely manner and monitored to ensure that such grievances are minimized, as all the employees are aware of the Grievance Handling procedure.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 8.A](#)

[Code area 10.A →](#)

No findings

Systems and evidence examined to validate this code section

Current System:

- A) There are no apparent concerns regarding any forms of abuse at the facility, as per employee and management interviews.
- B) Contact numbers of the top management are displayed in the factory for the workers to raise grievances to them directly.
- C) All forms of discipline are formally documented in line with local legal requirements.
- D) Facility has established the standing order to define the employment terms, misconducts and disciplinary action procedure.
- E) Facility has formed the Grievance Committee to handle work related the grievances. The last meeting of the committee was held on 18.08.2025 & 14.06.2025.
- F) Grievance procedure has been communicated workers on 05.08.2025.
- G) Contact numbers of the top management are displayed in the factory for the workers to raise grievances to them directly.
- H) The factory has ICC, agreement with external member Mr. Sumit Sharma (Advocate) dated 01.01.2025, last meeting of the ICC was held on 18.08.2025 & 14.06.2025. The factory has filed the annual return on 10.01.2025.

Evidence Examined:

- i) The factory's Disciplinary & Anti Harassment policies WP/HR/DP/P006 & WP/HR/SH/P014 dated 01.01.2025.
- ii) Interactions with management and employees
- iii) The relevant policy on prevention of harassment and abuse
- iv) Internal grievance procedure documentation
- v) Training records
- vi) Site tour

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
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What type of grievance mechanism(s) are available?	Grievance Committee, ICC & Suggestion box
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Number of grievances raised in the last 12 months	0
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Number of grievances resolved in the last 12 months	0
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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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

Facility has Environmental policy no. WP/HR/EP/P018 dated 01.01.2025. The policy includes environment impact analysis, GHG. Training to be provided to the employees for the conservation of the natural resources and waste management, the policy has indicate the process and action to be initiated incase any GAP or deviation is observed.

Resources: Robust

The Operation Manager is nominated as environmental manager. The manager is a competent person with experience in the field. He is well aware of the requirement under the code as regular training and updates are provided to him. He is well aware of the responsibilities bestowed on him, his knowledge about waste management was well.

Training and Communication: Some Improvement

The facility has a training plan on environmental requirements, proper training materials, the training is provided once in 3 months. The facility had provided training to the employees on environmental requirements, interviewed workers confirmed the same. The facility has also communicated the policy to the employees and relevant persons. The training provided to the workers were found ineffective.

Monitoring: Some improvement

The environmental objectives is being monitored, KPI is not well defined for GHG emissions.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law Base code	NC ZAF601099852

[← Code area 9](#)

[Code area 10.B →](#)

Systems and evidence examined to validate this code section

Current System:

- A) The facility established and maintained an Environmental Action policy - WP/HR/EP/P018 dated 01.01.2025 and the HR Manager was responsible for environmental compliance.
- B) The facility had a system to provide environmental awareness through notice board post to relevant employees.
- C) Factory have consent under air and water pollution- HSPCB/Consent/:3131280255SONCTO108479434 Issuing authority-HSPCB.
- D) The facility conducted necessary noise test and ambient air quality test once in a period of twelve months. The last test report was dated 07.08.2025 by Arihant Analytical Laboratory Pvt.
- E) The facility had provided training to the employees on environmental requirements on 13.07.2025 & 16.04.2025 Interviewed workers confirmed the same.
- F) Environment Risk Assessment done on 01.01.2025.
- During interaction with facility management, it was noted that the facility has not obtained the required waste handling permit under the Hazardous Substances Rules, 2016. Further, no application for the permit is currently in process.

Evidence Examined:

- i) Pollution Notification
- ii) Training record
- iii) Test reports
- iv) Waste records
- v) Site Tour
- vi) Interview with Management and workers

Findings: non-compliances

ZAF601099852

Non-compliance

Due 2025-10-17

Code area

10.A Environment 2-Pillar

Status

Open*

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

618 - No permits for waste disposal as per legal requirement

Area of non-compliance/non-conformance

Local law

Base code

Description

During interaction with facility management, it was noted that the facility has not obtained the required waste handling permit under the Hazardous Substances Rules, 2016. Further, no application for the permit is currently in process.

Corrective and preventative actions

Facility shall pursue an application to local state pollution control board and obtain the waste handling permit under the Hazardous Substances Rules, 2016.

Local law reference

In accordance with Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, Rule 6. Grant of authorization for managing hazardous and other wastes. — (1) Every occupier of the facility who is engaged in handling, generation, collection, storage, packaging, transportation, use, treatment, processing, recycling, recovery, pre-processing, co-processing, utilisation, offering for sale, transfer or disposal of the hazardous and other wastes shall be required to make an application in Form 1 to the State Pollution Control Board and obtain an authorisation from the State Pollution Control Board within a period of sixty days from the date of publication of these rules.

* PDF generated at 05:37 (UTC) on 17 Sept 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 10.A](#)

[Code area 10.B →](#)

10.A. Environment 2–Pillar

Data points

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)?

No

Does the site have any valid environmental or energy management certificates?

No such certification obtained

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current System:</p> <ul style="list-style-type: none"> A) The energy, water and waste generation are calibrated B) The carbon footprint is not calculated C) The non-hazardous & hazardous waste is disposed through authorized waste handler D) There is no renewable sources of energy. E) The factory has defined objective to reduce water & energy consumption by 1%. F) The factory conducted Impact & Aspect analysis on 01.01.2025, document no-WP/HR/EP/P018. <p>Evidence Examined:</p> <ul style="list-style-type: none"> i) Waste agreement ii) Site tour iii) Interaction with Management & workers iv) Energy & water calibration v) Environment aspect & impact reviewed 		

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?	Responsible use and management of water
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))?	Yes To reduce water & energy consumption by 1%
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)

[← Code area 10.B](#)

[Code area 10.C →](#)

Total electricity consumption from non-renewable sources (kWh)	787,656	459,466
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details) No Renewable energy used.	Other (provide details) No Renewable energy used.
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	No Purchased fuel used.	No Purchased fuel used.
Has the site completed any carbon footprint analysis?	No	No
Water sources	HSI IDC	HSI IDC
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,095	950
Water discharged	SEWER	SEWER
Water volume discharged (m3)	1,000	900
Water volume recycled (m3)	0	0
Total waste produced (mt)	11	10
Total hazardous waste produced (mt)	1	1

[← Code area 10.B](#)

[Code area 10.C →](#)

Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	10	9.5
Total product produced (mt)	1,204	1,100

[← Code area 10.B](#)

[Code area 10.C →](#)

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

[← Code area 10.B](#)

Management systems

Explanation for management systems grades

Policies and Procedures: Robust

The facility has policy on Business Ethics, policy no. WP/HR/BE/P023 dated 01.01.2025, the policy is reviewed once in 12 months. The policy also includes reporting mechanism and unanimous reporting, whistle blower policy and action initiated to eliminate such practices.

Resources: Robust

The Director was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery. The duties mention when the Director is not available the next person factory manager whom the matter can be raised.

Training and Communication: Robust

The facility's business ethics policy which was communicated to employees through posters and training. The facility has training plans and training calendar with training materials on corrupt and unethical practices. These trainings are provided once in 3 months. There are no unethical practices

Monitoring: Robust

The site has a robust system and ensure that there is no corrupt practices. Any compliant received is promptly addressed. There are no corruption charges against the facility nor any prosecution going on.

Risk level:

The site has a low inherent risk as observed from the number of migrant workers, nature of the work size of the facility.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 10.B](#)

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

Current System:

A) The Director was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.

B) The facility established a business ethics policy, WP/HR/BE/P023 dated 01.01.2025 which was communicated to employees through posters and trainings on 05.08.2025.

Evidence Examined:

- i) Training records
 - ii) Employee and Management interview
-

[← Code area 10.B](#)

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

No such certification obtained

[← Code area 10.C](#)

Attachments



[Cutting Section.JPG](#)



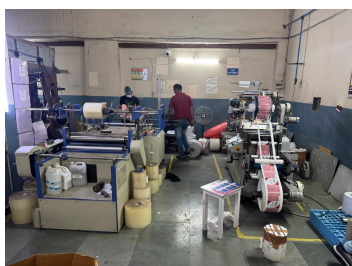
[Biometric Attendance.JPG](#)



[Building Overview.JPG](#)



[Digital Printing Section.JPG](#)



[Dyeing Section.JPG](#)



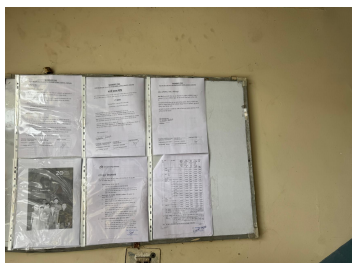
[DC Set.JPG](#)



[Digital Lab.JPG](#)



[Electric Panel.JPG](#)



[ETI Base code displayed.JPG](#)



[Fire Extinguisher.JPG](#)



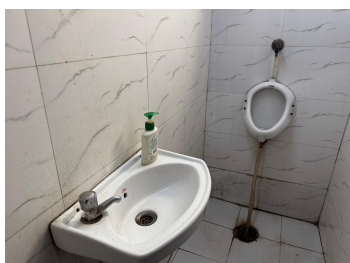
[Facility Name Board.JPG](#)



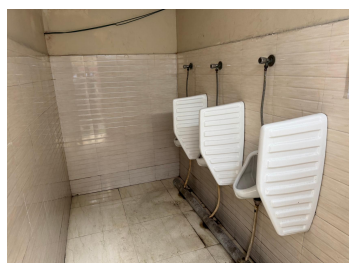
[Hooter.JPG](#)



[Entrance.JPG](#)



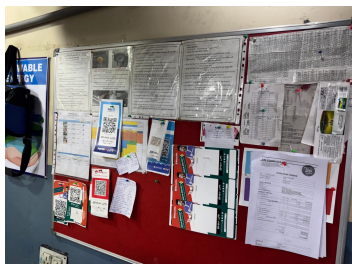
[Urinals.JPG](#)



[Urinal.JPG](#)



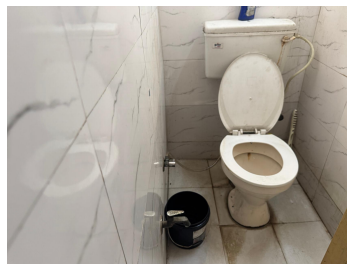
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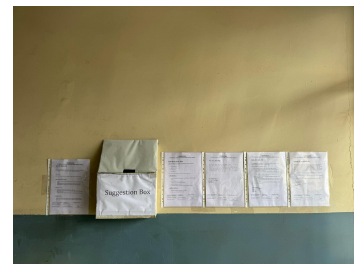
[Notice Board.JPG](#)



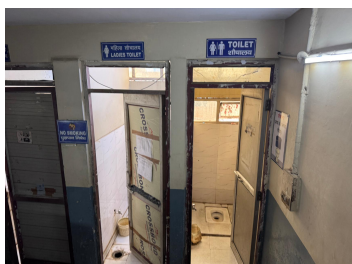
[Lamination Section.JPG](#)



[Toilets.JPG](#)



[Suggestion Box.JPG](#)



[Separated Toilets.JPG](#)



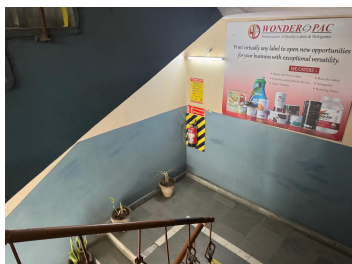
[NC- Pathway Marking not done.JPG](#)



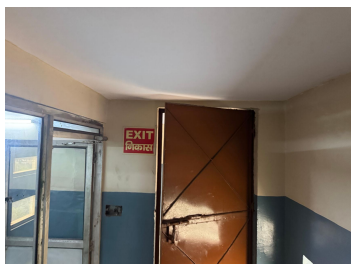
[NC- No Emergency Light installed.JPG](#)



[NC- No Wearing Proper PPE.JPG](#)



[NC- Without Emergency Light in staircase.JPG](#)



[NC- Door Opening inwards.JPG](#)



[NC- Chemicals without secondary container.JPG](#)



[NC- Exit Not Lighted.JPG](#)



[Signed CAPR-Wonder pac.pdf](#)

