

SMETA Corrective Action Plan Report (CAPR)

Version 5.0 Dec 2014, 2/4 Pillar Audit; replaces version 4.0 May 2012

Supplier name:	Indochine International	
Site country:	Bangladesh	
Site name:	Robintex (Bangladesh) Ltd.	
Parent Company name (of the site):	Robintex (Bangladesh) Ltd.	
SMETA Audit Type:	<input type="checkbox"/> 2-Pillar	<input checked="" type="checkbox"/> 4-Pillar
Date of Audit	16 th & 17 th January, 2017	

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 Best Practice Guidance Version 5 December 2015 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers, and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

(2) The audit scope was against the following reference documents:
Please check appropriate SMETA Audit Type in the above box:

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Management systems and code implementation,
 - Entitlement to Work and Immigration,
 - Sub-Contracting and Home working

4-Pillar SMETA Audit

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics

The new ETI Working Hours Clause

- Now integrated into this latest SMETA version.

Where appropriate non-compliances were raised against the ETI code / SMETA Additions and local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.





Audit Company Name: Intertek	Report Owner (payee): Robintex (Bangladesh) Ltd.
<i>Sedex Company Reference:</i> <i>(only available on Sedex System)</i>	ZC154593250
<i>Sedex Site Reference:</i> <i>(only available on Sedex System)</i>	ZS154619617

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

<i>Auditor Reference Number:</i> <i>(If applicable)</i>	Not applicable
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Audit Details

Audit Details			
A: Report #:	BGD 8635-01(34)		
B: Time in and time out <i>(SMETA BPG recommends 9.00-17.00 hrs. if any different please state why in the SMETA declaration)</i>	Day 1 Time in: 10:20 hours Day 1 Time out: 18:00 hours	Day 2 Time in: 09:20 hours Day 2 Time out: 17:30 hours	Day 3 Time in: NA Day 3 Time out: NA
C: Number of Auditor Days Used: <i>(number of auditor x number of days)</i>	Day 1 (January 16, 2017): Four man-days (1 st day x Four auditors). Day 2 (January 17, 2017): Three man-days (2 nd day x Three auditors).		
D: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other – Define Desktop Verification		
E: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced		
F: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If No , why not? <i>(Examples would be, site has not completed SAQ, site has not been asked to complete the SAQ.)</i>	Not Applicable		
G; Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
H: Auditor name(s) and role(s):	Day One: Salman Mostafiz – Lead Auditor Chandramallika Ghosh – Member Auditor Abdullah Muktedir – Member Auditor Md Abdullah Al Mamun – Member Auditor Day Two Salman Mostafiz – Lead Auditor Abdullah Muktedir – Member Auditor Asadur Rahman – Member Auditor		
I: Report written by:	Salman Mostafiz		
J: Report reviewed by:	Asadur Rahman		

K: Report issue date:	17 th January, 2017 (On site CAPR)
L: Supplier name:	Indochine International
M: Site name:	Robintex (Bangladesh) Ltd.
N: Site country:	Bangladesh
O: Site contact and job title:	Mr. Sikder Mazedur Rahman – Vice President & Head of Compliance
P: Site address: (Please include full address)	Vulota, Post: Vulota Bazar, PS: Rupgonj, District: Narayanganj, Bangladesh.
Site phone:	+88 01819815692
Site fax:	+88 02 9117751 (Head Office)
Site e-mail:	compliance@robintexbd.com
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance	<p>Facility license No: 9716/Dhaka - Robintex (Bangladesh) Ltd. issued by Govt. Of the people's Republic of Bangladesh which is valid until 30 June 2017.</p> <p>Fire License No: DD/Dhaka/8524/1996 and DD/Dhaka/18089/2003 issued by Bangladesh Fire Service & Civil Defence Authority that is valid until 30 June 2017.</p> <p>Trade License No: 48/2016-2017 – Robintex (Bangladesh) Ltd. issued by Vulota Union Parishad which is valid until 30 June 2017.</p>
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	All type of knit items
S: Audit results reviewed with site management?	Yes
T: Who signed and agreed CAPR (Name and job title)	Mr. Sikder Mazedur Rahman – Vice President & Head of Compliance
U: Did the person who signed the CAPR have authority to implement changes?	Yes
V: Present at closing meeting (Please state name and position, including any workers/union reps/worker reps):	<p>Intertek:</p> <ol style="list-style-type: none"> 1. Salman Mostafiz – Lead Auditor 2. Abdullah Muktadir – Member Auditor 3. Asadur Rahman – Member Auditor <p>Facility Representative:</p> <ol style="list-style-type: none"> 1. Mr. Sikder Mazedur Rahman – Vice President & Head of Compliance

	2. Mr. Major Md. Abdur Rahman (Retd.) – Sr. Vice President Admin & HRD. 3. Mr. Abdullah Al Masum – AVP PS to MD/Director 4. Mr. Mahmud Manjurul Alam - SVP 5. Mr. Md. Abul Basar - SEO (Compliance) 6. Mr. Md. Sharij Morshed – SEO (Compliance) 7. Ms. Swapna Akter– Vice President – Participation Committee 8. Mr. Md. Jakir Hossain – Member - Participation Committee			
W: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee (Participation Committee) <input type="checkbox"/> Other (specify) <input type="checkbox"/> None			
X: Are any workers covered by Collective Bargaining Agreement (CBA)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Y: Previous audit date:	NA			
Z: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other
	Full Initial	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Periodic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Full Follow-Up Audit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Partial Follow-Up	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Partial Other*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*If other, please define: Not Applicable				

Guidance:

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more ‘balanced’ audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

Note: it is not mandatory to complete this column at this time.

Root cause refers to the specific procedure or lack of procedure which caused the issue to arise. Before a corrective action can sustainably rectify the situation it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

See SMETA BPG Chapter 7 ‘Audit Execution’ for more explanation of “root cause”.

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Time scale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
Management system & Code Implementation: 0 and Bangladesh Labor Rules, 2015, Rule 23(1), 24(1) & 108(1)		It was noted through management interview and documents review that the facility management did not maintain worker register; leave register in prescribed format. Moreover the facility did not provide leave book to the employees. This issue has been verified through desktop review Dated on 10/02/2017.	Lack of awareness	It is recommended that the facility management should have worker register; leave register as per prescribed form and provide 'Leave Book' to employees.	30 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has worker register; leave register as per prescribed Form.	Open Closed

Working Conditions are Safe and Hygienic 3.1 and Bangladesh Labor Rules 2015, Rule 80(1), (2).		It was noted through document review and management interview that the facility had not maintained Safety Record Book and Safety Data Board as per local legislation. This issue has been verified through desktop review Dated on 10/02/2017.	Newly implement	It is recommended that the facility should maintain Safety Record Book as per legal requirement.	90 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has 'Safety Record Book & Safety data board' as per legal requirement	Open Closed
Working Conditions are Safe and Hygienic 3.1 and Bangladesh Labor Rules 2015, Rule 55 (14).		It was noted through management interview and employee interview that facility did not arrange fire drill for night shifts after year 2015. Note that facility has 03 shifts for Knitting and Dyeing Section. Such as 06:00 AM to 02:00 PM, 02:00 PM to 10:00 PM and 10:00 PM to 06:00 AM This issue has been verified through desktop review Dated on 10/02/2017.	Newly implement	It is recommended that the facility management should conduct fire drill at night shift.	90 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility conduct 'Night fire drill'	Open Closed
Working condition are		It was noted through facility visit, fire license review and	Lack of monitoring	It is recommended that facility	60 Days	Desktop	Y -	Upload relevant evidence on	Open Closed

<p>safe and hygienic: 3.1 in accordance with facility's fire license</p>		<p>management interview that,</p> <p>a) Public Address system (PA) was not connected at general store of shed 3.</p> <p>b) Smoke detector was not interconnected at general store of shed 3.</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>		<p>management should install all the mentioned firefighting equipment's.</p>			<p>Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>SEDEX database showing issue has been corrected.</p>	
<p>Working condition are safe and hygienic: 3.1 and Bangladesh Labor (amendment) Act 2013, Section-78A(1)</p>		<p>It was noted through facility tour,</p> <p>a) 30% employees (printing operator) were not wearing face mask in the printing section building 1 (garments building).</p> <p>b) Generator operator was not using any PPE.</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>	<p>Lack of monitoring</p>	<p>It is recommended that facility should monitor use of proper personal protective equipment.</p>	<p>30 days</p>	<p>Desktop</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>Upload photo evidence to SEDEX showing wrkers were using PPE for mentioned areas.</p>	<p>Open Closed</p>

<p>Working condition are safe and hygienic: 3.1.</p>		<p>It was noted from facility tour that 06 chemical drums were found without labelling and secondary containment in printing section building 1 (garments building).</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>	<p>Lack of awareness</p>	<p>It is recommended that the facility should provide labelling and secondary containment in mentioned area.</p>	<p>30 days</p>	<p>Desktop</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>Upload photo evidence to SEDEX showing facility has provided, labelling and secondary containment in the mentioned areas.</p>	<p>Open Closed</p>
<p>Working condition are safe and hygienic: 3.1 & Bangladesh Labor Rules, 2015, section 86(6)</p>		<p>It was noted from facility tour that eye wash station was found missing in the spot removing room in 6th floor of building 1 (garments building).</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>	<p>Lack of monitoring</p>	<p>It is recommended that the facility management should install eye wash station at mentioned area.</p>	<p>30 days</p>	<p>Desktop</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>Upload photo evidence to SEDEX showing facility has eye wash station.</p>	<p>Open Closed</p>
<p>Working condition are safe and hygienic: 3.1 & Bangladesh Labor Rules 2015, Section: 54(4)</p>		<p>It was noted from facility tour that one side hand rail missing in the building 2</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>	<p>Lack of monitoring</p>	<p>It is recommended that the facility management should install hand rail in both side of stair case.</p>	<p>90 days</p>	<p>Desktop</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>Upload photo evidence to SEDEX showing facility has both side hand rail.</p>	<p>Open Closed</p>

&5)									
Working condition are safe and hygienic: 3.1 & Bangladesh Labor Rules 2015, Section 55(11)		It was observed during plant tour that prescribed uniform was not given to fire fighter, rescuer & first aider as per rules. This issue has been verified through desktop review Dated on 10/02/2017.	Lack of monitoring	It is recommended that the facility should provide fire fighter, rescuer & first aider dress as per rules.	60 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has First Aid, Rescue and Fire Fighting team dress.	Open Closed
Working Conditions are Safe and Hygienic 3.1 and Electricity Rules 1937, Rule no-48:		It was noted through management interview and document review it was noted that 02 out of 02 electricians did not have competency certificate as per local legislation.	Newly implement	It is recommended that the facility should obtain electrician competent certificate as per law.	90 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has 'Electrician competent certificate' as per legal requirement	Open
Working Conditions are Safe and Hygienic 3.1		It was noted through management interview that the facility had not conducted health check-up for employee who were involved in hazardous activities, e.g. electricians, boiler/generator operators, employees who handles chemicals. This issue has been verified through desktop review Dated	Newly implement	It is recommended that the facility should arrange health check-up for the employees.	90 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has 'Health check-up for mentioned employees' as per legal requirement	Open Closed

		on 10/02/2017.							
Working Conditions are Safe and Hygienic 3.1		It was noted through management interview that the facility did not test noise level and air emission of the facility.	Newly implement	It is recommended that the facility should test noise level and air emission test.	90 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has ‘test noise level and air emission test’ as per legal requirement	Open
Working Conditions are Safe and Hygienic, ETI 3.1 & Bangladesh Labor Rules 2015, Section 77 (5) c, y, & r)		It was noted through facility tour, document review and management interview that the facility did not have disinfecting equipment, tetanus serum, gas measurement tools etc. at medical room. This issue has been verified through desktop review Dated on 10/02/2017.	Lack of monitoring	It is recommended that the facility should provide sufficient medical equipment at medical room.	30 Days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has Sufficient medical equipment.	Open Closed
Working Conditions are Safe and Hygienic, ETI 3.1 & Bangladesh Labor Rules 2015, Section		It was noted from facility tour and management interview that first aid kits were found insufficient in the first aid boxes of building 1 (garments building) and building 2 (textile building). Note that 3 packs of oral saline, tourniquet, Analgesic and antacid type of	Lack of monitoring	It is recommended that the facility should provide sufficient first aid contents in first aid boxes.	30 Days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has Sufficient first aid contents in first aid boxes.	Open Closed

- 76 (2)		tablets etc. were found missing. This issue has been verified through desktop review Dated on 10/02/2017.							
Working Conditions are Safe and Hygienic, ETI 3.1 & Bangladesh Energy Regulatory Commission License Regulations 2006, section 9 (b)		It was noted through management interview and document review it was noted that the facility did not have CPP (Captive Power Plant) license for their power generation capacity of 3.09 MW.	Lack of monitoring	It is recommended that the facility should obtain CPP license for their power generation.	30 Days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has CPP license.	Open
Working condition are safe and hygienic: 3.1 & Bangladesh Labor Rules 2015, section- 353(1 & 4) & 94(1)		It was noted through plant tour, document review and management interview that there are mismatch found between facility layout approval and currently established facility such as printing section in 3rd floor but layout shows sewing section in mentioned area of the building 1. Same as 2nd floor, 7th floor found mismatch with existing layout plan of the building 1, 3rd floor of the	Lack of awareness	It is recommended that the facility should have approved building layout plan for the respective floor from the concern authority.	30 days	Desktop	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Upload photo evidence to SEDEX showing facility has facility layout plan for mentioned areas.	Open

		<p>building 3 and ground floor of the building 6 and shed 1.</p> <p>Moreover, building 5 which is commonly used has no approved floor layout plan from the concern authority.</p>							
<p>Living wages are paid 5.1 & Minimum wage gazette 2013, Marginal Privileges-1.</p>		<p>It was noted through salary sheet, employee personal file review, employee and management interview it was noted that, 5% increment was not ensured after completing 1 year length service. As one employee joined July, 2015, he/she will be entitled for increment on July, 2016 salary but facility provided his/her 5% increment on October, 2016 salary. Beside this facility did not calculate the arrear bill from which month employees are supposed to entitle. Note that facility provided increment only on January, April, July and October for previous 3 months entitled employees.</p>	<p>Lack of monitoring</p>	<p>It is recommended that facility shall be providing yearly increment with new rate of overtime for whose employee completed 1 year service in the facility.</p>	<p>60 Days</p>	<p>Follow-up</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>Salary sheet and time card review and management and employee interview</p>	<p>Open</p>
<p>Living wages are paid 5.1</p>		<p>Employees welfare fund could not be verified due to management could not able to provide any policy, procedure, meeting minutes, bank account information. Note that facility has a welfare</p>	<p>Lack of monitoring</p>	<p>It is recommended that facility management should ensure all documented policy procedure.</p>	<p>60 Days</p>	<p>Follow-up</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president &</p>	<p>Policy and procedure file review and management and employee interview</p>	<p>Open</p>

		fund where only employees are contributing BDT 2 or BDT 10 or BDT 50 monthly basis.					Head of Compliance		
Living wages are paid 5.1 and Bangladesh Labor Law 2006, Section-150(1)		Workplace injury or accident or incident compensation was not ensured by facility management. Note that employees who fall in work place injury are compensated from employee's welfare fund instead of facility's own account.	Lack of monitoring	It is recommended that facility management should ensure all workplace injury compensation.	60 Days	Follow-up	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Policy and procedure file review and management and employee interview	Open
Working Hours 6.1 and Bangladesh Labor Law 2013, Section-118(3)		It was noted through document review that the 32 out of 80 randomly selected employees have worked on 21 st February, 1 st May, 16 December, 2016 (festival holiday declared by the facility), without 02 days compensatory and 01 day substitute holiday. However, facility management has paid overtime payment against the work on this day.	Lack of monitoring	It is recommended that facility management should ensure all documented policy procedure.	60 Days	Follow-up	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Policy and procedure file review and management and employee interview	Open
Working Hours 6.1 and Bangladesh Labor Law 2006, Section-102(1 & 2)		It was noted through employees' time record, salary sheet review, employees and management interview that employees of the facility had worked excessive hour's overtime in a day as well as weekly holiday work. Thus excessive working hours were	Lack of monitoring	It is recommended that the facility management should keep regular working hour within legal limits.	60 Days	Follow-up	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Policy and procedure file review and management and employee interview	Open

and Govt. waiver circular dated on 31 October 2016 :		noted as follows: a) 14 out of 80 employees had worked minimum 74 to maximum 78 hours of work in a week in the month of December 2016 (Current month). b) 46 out of 80 employees had worked minimum 75 to maximum 100 hours of work in a week in the month of May 2016 (random month). Maximum 14 hours of work found in a day. c) 48 out of 80 employees had worked minimum 75 to maximum 101 hours of work in a week in the month of February 2016 (random month). Maximum 14 hours of work found in a day.							
Working Hours 6.1 and Bangladesh Labor Law 2006, section- 103(a)		It was noted from documents review (Time card), employees and management interview it was noted that facility was open on May 06, 20, 27; February 05, 12, 19, 26; 2016 which were weekly holidays (Friday) of the facility. As a result employees of the facility did not get one day off after seven day period of work.	Lack of monitoring	It is recommended that facility management should ensure weekly holidays as per law.	60 Days	Follow-up	Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance	Policy and procedure file review and management and employee interview	Open
Regular employment		It was noted through facility management representative	Lack of monitoring	It is recommended that facility should	90 Days	Desktop	Y -	Upload photo evidence to	Open Closed

<p>is provided , ETI Base Code, point: 8.1, Bangladesh Labor Rules, 2015, section 19(5)</p>		<p>interview and review identity card of employees was noted that the facility had not provided identity cards in prescribed format to all employees.</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>		<p>provide identity card in prescribed format to all employees as per law.</p>			<p>Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>SEDEX showing facility has ID card of employees as per prescribed format</p>	
<p>Environment 10B (4.2) and Environment Conservation rules 1997, Rule 8(1 & 2)</p>		<p>It was noted through management interview and document review that the facility's environmental clearance certificate was expired on 5 August 2016. Note that the facility had applied for renewal on 24 July 2016.</p> <p>This issue has been verified through desktop review Dated on 10/02/2017.</p>	<p>Lack of monitoring</p>	<p>It is recommended that facility should collect updated environmental clearance certificate as per law.</p>	<p>90 Days</p>	<p>Desktop</p>	<p>Y - Mr. Sikder Mazedur Rahman – Vice president & Head of Compliance</p>	<p>Upload photo evidence to SEDEX showing facility has environmental clearance certificate</p>	<p>Open Closed</p>

Corrective Action Plan – Observations

<p>Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i></p>	<p>New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i></p>	<p>Details of Observation <i>Details of Observation</i></p>	<p>Root cause <i>(completed by the site)</i></p>	<p>Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i></p>
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1. Environment 4-Pillar 10B4.6		It was noted through management interview that the facility did not conduct an environment impact assessment (internal/ external) to evaluate the significant environmental impacts of its sites and processes upon environment.	Lack of awareness	It is recommended that facility should conduct environment impact assessment through internal or external parties for evaluate the significant environmental impacts of its sites and processes.
2. Environment 4-Pillar 10B4.9		It was noted through management interview that the facility management did not implement environmental management system in the facility.	Lack of awareness	It is recommended that facility should developed environment management system for the facility.

Good examples

Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
5.1	The company has a procedure to provide monthly attendance bonuses to its employees.	Documents review, management and employees interview.

Confirmation

<p>Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i></p>		
<p>A: Site Representative Signature:</p>	<p>Mr. Sikder Mazedur Rahman</p>	<p>Title: Vice president & Head of Compliance Date: 16th & 17th January 2017</p>
<p>B: Auditor Signature:</p>	<p>Salman Mostafiz, Asadur Rahman, Abdullah Muktedir</p>	<p>Title: Lead Auditor and Auditors Date: 16th & 17th January 2017</p>
<p>C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.</p>		
<p>D: I dispute the following numbered non-compliances: None</p>		
<p>E: Signed: (If <u>any</u> entry in box D, please complete a signature on this line)</p>		
<p>F: Any other site Comments: None</p>		

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a “root cause“

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.

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

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

Click here for A & AB members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Ing5lw_3d_3d

Click here for B members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brq_3d_3d

Disclaimer

Any proposed Corrective Action Plan (CAP) closed utilizing a Desktop Review is limited by the evidential documentation provided by the facility in order to correct the non conformance. The intent of this service is to provide assurance that the facility is on the correct path with its proposed or completed corrective actions. Intertek cannot be held responsible for the falsification of evidence or the effective implementation of the proposed corrective actions, which in many instances may only be truly validated by an onsite Audit visit owing to the limitations of the desktop review process. The facilities shall be wholly responsible for the correct and effective implementation of their proposed CAP.

Intertek nor any of its affiliates shall be held liable for any direct, indirect, threatened, consequential, special, exemplary or other damages that may result including but not limited to economic loss, injury, illness, or death arising from the inability of a facility to implement its CAP.



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