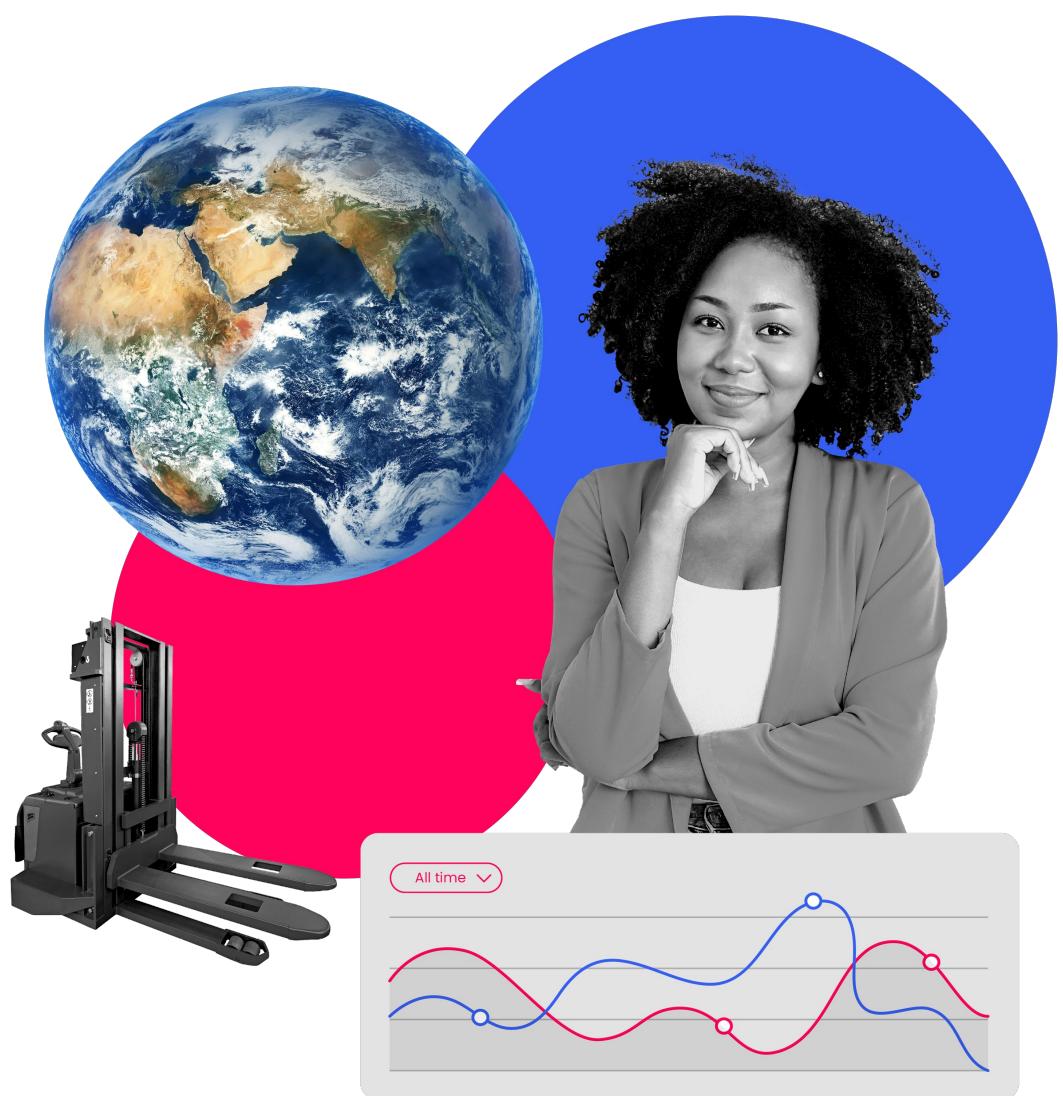




Sedex Members Ethical Trade Audit Report

Version 7



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Attachments

Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

Included in a 2-Pillar audit:

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

Included in a 4-Pillar audit:

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

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC1069373	Auditor company name	SGS ASIA
Date of audit	2024-12-20	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1004469	Site name	zircon Technologies India Limited Dehradun
Business name	ZIRCON TECHNOLOGIES INDIA LIMITED	Site address	248197 KHASRA NO. 1017, 1019, 1021, CAMP ROAD (BEHIND HOTEL SPICE) SELAQUI, DEHRADUN – UTTRAKHAND,, Dehradun, IN
Site phone	0135-2933555	Site email	accountsddn1@zircontech.com

Audit parameters

Time in and out	Day 1
	In 09:00
	Out 15:30
Audit type	Periodic
Was the audit announced?	Announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Ms Shalini Chadha / Exe. Director
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	No Union In the facility		
Reason for absence during the audit	No Union In the facility		
Reason for absence at the closing meeting	No Union In the facility		

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)

Nil

Lead auditor	Amruta Prasad Ojha	APSCA Number	21703229
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Additional auditor	MOHIT KUMAR	APSCA Number	32200416
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Date of declaration	2024-12-20
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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	Ms Shalini Chadha
Title	Exe. Director
Date of declaration	2024-12-20

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	§1	NC ZAF600743353
	3.L Implement effective processes to manage f...	§2	NC ZAF600743354
	3.G Provide sufficient first-aid supplies ons...	§3	NC ZAF600743355
	3.O Implement an appropriate electrical safet...	§4	NC ZAF600743356
	3.L Implement effective processes to manage f...	§5	NC ZAF600743357
	3.O Implement an appropriate electrical safet...		NC ZAF600770507
	3.M Ensure all machinery is installed, mainta...		NC ZAF600770508
	3.N Maintain a log of all hazardous substance...		NC ZAF600770509
	3.N Maintain a log of all hazardous substance...		NC ZAF600770510
	3.L Implement effective processes to manage f...		NC ZAF600770511
	3.L Implement effective processes to manage f...	§6	NC ZAF600770513
	3.N Maintain a log of all hazardous substance...		NC ZAF600770515
5. Legal wages are paid	5.A Ensure that all workers (including non-em...	§7	NC ZAF600743358
	5.A Ensure that all workers (including non-em...	§8	NC ZAF600743359
2. Freedom of association and right to collective bargaining are respected	2.B Not prohibit, discourage or interfere wit...		NC ZAF600770506
8. Regular employment is provided	8.A Provide a written contract or other bindi...		NC ZAF600770512
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§9	NC ZAF600770514

Local law issues

§1 In accordance with the Factories Act, 1948, chapter 4, article 32(a): In every factory, passages shall be of sound construction and properly maintained, and shall be kept free from obstruction and substances likely to cause persons to slip. Where it is necessary to ensure safety, steps, stairs, passages and gangways shall be provided with substantial handrails.

§2 In accordance with the Uttar Pradesh Factories Rules (1950), Rule 61(10)(nn), a proper fire alarm system shall be provided if the total capacity of the building is over 500 persons, or if more than 25 persons are employed above or below the ground floor, except buildings where the entire area is undivided and all parts thereof are clearly visible to all occupants

§3 In accordance with the Factories Act, 1948, Chapter 5, Article 45(1): In every factory, there shall be provided and maintained so as to be readily accessible during all working hours, first-aid boxes equipped with prescribed contents. The number of such boxes or cupboards to be provided and maintained shall not be less than one for every 150 workers ordinarily employed in the factory.

§4 In accordance with the Indian Electricity Rules 1956, Rule 30 (1), the supplier shall ensure that all electric supply lines, wires, fittings and apparatus belonging to him or under his control, are in a safe-condition and in all respects fit for supplying energy and the supplier shall take due precautions to avoid danger arising on such premises from such supply lines, wires, fittings and apparatus.

§5 In accordance with the U.P (Uttarakhand) Factories Rules (1950), Rule 61(10)(e) the exits shall be clearly visible and suitable illuminated with suitable arrangements, whatsoever 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.

§6 In accordance with the U.P (Uttarakhand) Factories Rules (1950), Rule 61(10)(e) the exits shall be clearly visible and suitable illuminated with suitable arrangements, whatsoever 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.

§7 In accordance with the Minimum Wages Act, 1948, Section 12: The employer shall pay every employee engaged in scheduled employment under him, wages at a rate not less than the minimum rate of wages fixed by State Government's notification for that class of employee in that employment.

§8 In accordance with the Payment of Wages Act, 1936, Section 5: Payment of wages to every person employed in a factory employing less than 1000 persons shall be made before the end of the 7th day after their work period.

§9 According to The Central Ground Water Authority (that is constituted under Section 3 (3) of Environment Protection Act 1986), NOC to extract ground water has to be obtained from the relevant authorities for all Notified and Non Notified Areas.

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	✓	✓	✓	ℹ

✗ Not addressed

⚠ Fundamental improvements required

ℹ Some improvements recommended

✓ Robust management systems

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

✗ Not addressed

⚠ Fundamental improvements required

ℹ Some improvements recommended

✓ Robust management systems

Site details

Company and site details

Sedex company reference	ZC1069373	
Sedex site reference	ZS1004469	
Company name	ZIRCON TECHNOLOGIES INDIA LIMITED	
Business ownership type	GOODS	
Site name	zircon Technologies India Limited Dehradun	
Site name in local language	zircon Technologies India Limited Dehradun	
GPS location	GPS address KHASRA NO. 1017, 1019, 1021,, CAMP ROAD (BEHIND HOTEL SPICE) SELAQUI, DEHRADUN – UTTRAKHAND,	Coordinates Latitude--30.36123, Longitude--77.84368
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name Ms Shalini Job title Executive Director Phone number 0135-2933555 Email accountsddn1@zircontech.com	
Applicable business and other legally required business license numbers and documents	Factory License-- # DDN-896 valid till 31-12-2024. for 150 workers. Fire NOC- # 1204 Valid from 20-10-2022 to 19-10-2025. Stability Certificate---Form-02- Obtained on January 2016 from Competent Structural Engineer-Mr Rajeev Kumar. Building plan # JS/07/71/12 approval dated 27-08-2012. Air, water and Hazardous waste consent--# UKPCB/HO/CON/Z-2/2022/1442, dated 01-12-2022 valid till 31-03-2025. Contractor Registration---# 600/D-CL/11 dated 26-11-2011 and amended dated 23-10-2024. Contractor License-- Pawan Hans Associated -- dated 16-11-2024 valid till 15-11-2025. Certified standing order--dated 05-01-2016 certified copy verified.	

Site activities

Site function	Factory Processing/Manufacturer
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Site activities

Site activities	Primary	Printing
	Secondary	
	Other	
Product type	Pressure sensitive Self adhesive and non self adhesive	Printed label
Process overview	Receiving of rawmaterial, printing, Checking, packing and dispatch.	
What level of mechanization best describes the work at this site?	High mechanisation / low manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	2416m ²	
Building 1	Last construction works on site	2010
	If building is shared, provide details	No
	Number of floors	3
	Description of floor activities	Ground Floor-- Security operation, production, Scrap Yard, Utility area, 1st Floor---office area, Digital printing section, 2nd floor--QC, Dispatch, Lunch room.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not provided No transport provided

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 or back shift work at the site?	Yes			
	2nd and Night shift is in operation			
What percentage of the workforce, including temporary and agency workers, work during the night/ back shift?	15%			
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	No			
	Only Morning and general shift conducted			

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)
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?	Yes Assessment of impact on human rights have been done

Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?

Yes

HRIA has been conducted in 2024

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	63 (91.3%)	6 (8.7%)	- -	69 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	24 (34.8%)	0 (0%)	- -	24 (34.8%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	39 (56.5%)	6 (8.7%)	- -	45 (65.2%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	10 (14.5%)	0 (0%)	- -	10 (14.5%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	10 (14.5%)	0 (0%)	- -	10 (14.5%)

* % of total workforce

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

Workers by age

	Men	Women	Other	Total
18 - 24 years old	7 (10.1%)	0 (0%)	- -	7 (10.1%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

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

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	91%	9%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	0 (0%)	0 (0%)	- -	0 (0%)
Salaried workers	63 (91.3%)	6 (8.7%)	- -	69 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	63 (91.3%)	6 (8.7%)	- -	69 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

Nil

People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	2 (2.9%)	3 (4.3%)	- -	5
Supervisors or team leaders	5 (7.2%)	1 (1.4%)	- -	6
Administrative staff	7 (10.1%)	4 (5.8%)	- -	11

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Group interviews
Individual 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 4 worker			
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 Complain from workers
What did the workers like the most about working at this site?	Job security Pay Equal opportunities Communication (e.g. from management) Social activities and events Grievance mechanisms Freedom of movement Hours worked, rest days or breaks
Additional comments	All workers are happy to work in the facility. There is no wages withheld by HR department. There is regular communication between management and workers
Attitude of workers' committee/union representatives	The workers representative was interviewed. It was reported that there is no complain received from any workers. Management always cooperated with workers and no pending issues.
Attitude of managers	All management staffs are aware about code implementation. They confirmed that there is good relation between management and workers. All workers are happy to work here. There is no pending issues.

Workers interviewed by type

	Total
Permanent workers	9
Temporary or fixed-term employees	0
Agency or subcontracted workers	1
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total

Workers interviewed by group/individual

Workers interviewed in groups	4	0	-	4
Workers interviewed individually	4	2	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	3	0	-	3
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	3	0	-	3

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	2.0%	2.0%	-	4.0%
Previous full calendar year (2022)	2.0%	2.0%	-	4.0%

* 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%	1.0%	-	3.0%
Last full calendar year (2023)	2.0%	1.0%	-	3.0%
Previous full calendar year (2022)	2.0%	1.0%	-	3.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?

Yes

There was no accident/ incident happened since last 1 year

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

	Men	Women	Other	Total

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

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

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

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

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Compliance of code of conduct on Human Rights lies with Ms Shalini Chaddha Exe Director.</p> <p>The facility has defined policies for Human Rights dated 25-03-2018.</p> <p>Policy on protection of Confidential Information and confidential reporting system is incorporated in the Data privacy and confidential policy. There is Human rights Impact assessment done for stakeholders.</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
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes All documents of agency worker were available for verification

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Free chosen employment. She also monitor the implementation of the code. The facility has defined policies on No forced labour, free chosen employment. There was training imparted on free chosen employment to employees.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Forced labour and free chosen employment. Policy on forced labour well defined as per ZIR/FL/01. There was no issue of forceful detention of workers and no holding of payment observed. Workers can leave job as per their wish. They can keep themselves away in case any dangerous situation. There was no NC finding in this section		

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
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Responsible recruitment. She also monitor the implementation of the code implementation. The facility does not engage any middle man or agency for labour recruitment.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Responsible recruitment. There are contractor worker hired including security guards. There are no other middle man involved in labour recruitment activities. During worker interview, it was confirmed that no recruitment fee is taken from workers. All regular employees are directly hired by the facility HR department.		

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 Workers are recruited and hired by licensed labour providers There are contractor workers engaged in production area and Security guard service.
Provide business names for all labour providers and programmes used	Contractor Registration---# 600/D-CL/11 dated 26-11-2011 and amended dated 23-10-2024. Contractor License-- Pawan Hans Associated -- dated 16-11-2024 valid till 15-11-2025.
How do the labour providers recruit and hire workers?	Directly
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 (including 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?	Yes
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

Migrant workers

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

List the sending states/provinces/regions Only 15% of workforce are from other state like UP

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?

No

No Recruitment fee taken from worker

Were recruitment fees or costs identified during worker interviews?

No

No Recruitment fee taken from worker

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	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Freedom of association. She also monitor the implementation of the code implementation. Workers are aware about their representative and also aware about policy on freedom of association through training. There was no record of worker representative recruitment evidenced. Hence NC reported.

Summary of findings

Code area	Workplace requirement	Local law	Finding
2. Freedom of association and right to collective bargaining are respected	2.B Not prohibit, discourage or interfere with workers forming a union		NC ZAF600770506
Systems and evidence examined to validate this code section	Policy-- ZIR/FACB/01 dated 26-12-2018, Responsibility for compliance of code of conduct on Freedom of association and collective bargaining--Ms Shalini Chaddha Exe Director. The facility does not prohibit workers to form or join union. However, there is no union formed by the workers. There is worker representative elected by workers. However, there was no record evidenced for free election of worker representative. Worker committee--3 from worker and 3 from staff--last meeting 27-11-2024 and previous 18-06-2024. There was workers welfare issue discussed.		

Findings: non-compliances

ZAF600770506

Non-compliance

Due 2025-02-12

Code area

2 Freedom of association and right to collective bargaining are respected

Status

Open*

Workplace requirement

2.B Not prohibit, discourage or interfere with workers' rights to join a trade union of their own choosing or other form of worker representation, including worker committees or similar arrangements where the right to freedom of association is restricted under law. This should include the fair and free selection and election of representatives, and their rights to engage in collective bargaining.

Time given to resolve

30 days

Issue title

129 - Worker/union representatives are not freely elected (e.g. they are assigned by management)

Verification method

Desktop audit

Description

There was no record evidenced for free election of worker representative

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

The facility shall maintain adequate record evidenced for free election of worker representative

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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? No

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

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
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	Fundamental Improvements Required
Explanation for management systems grades	Policy on Health and safety-- dated Policy-04-04-2018 Responsibility for compliance of code on Health and Safety--Ms Shalini Chaddha Exe Director. Training on health and safety has been provided to the workers. There is lack in monitoring for health and safety system related to NCs reported.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.L Implement effective processes to manage f...	§1	NC ZAF600743353
	3.L Implement effective processes to manage f...	§2	NC ZAF600743354
	3.G Provide sufficient first-aid supplies ons...	§3	NC ZAF600743355
	3.O Implement an appropriate electrical safet...	§4	NC ZAF600743356
	3.L Implement effective processes to manage f...	§5	NC ZAF600743357
	3.O Implement an appropriate electrical safet...		NC ZAF600770507
	3.M Ensure all machinery is installed, mainta...		NC ZAF600770508
	3.N Maintain a log of all hazardous substance...		NC ZAF600770509
	3.N Maintain a log of all hazardous substance...		NC ZAF600770510
	3.L Implement effective processes to manage f...		NC ZAF600770511
	3.L Implement effective processes to manage f...	§6	NC ZAF600770513
	3.N Maintain a log of all hazardous substance...		NC ZAF600770515

Systems and evidence examined to validate this code section

Policy on Health and safety-- dated Policy-04-04-2018
Responsibility for compliance of code on Health and Safety--Ms Shalini Chaddha Exe Director.
Health & Safety Committee---3 members each from management and workers. Last committee meetings conducted on dated 21-10-2024, Previous meeting was done on 18-08-2024. There was discussion of safety performances.
Accident register form-23 has been maintained – There have been no accidents in last 1 year.
Training on safety---
Chemical safety, MSDS--training done on 18-04-2024 & 21-11-2024 for Ink handling persons.
Fire Fighting---104 persons trained on 11-11-2024. Training on general health and safety including Use of PPE--done on 19-06-2024, Machine safety--dated 25-07-2024 and 22-11-2024, Training was done as per training calender for 2024.
First aid training ---dated 11-12-2024 for 15 persons from IRCS(authorized training provider)
Training on Environment management--- -05-2024
There was last fire drill conducted on 11-11-2024.
Fire drill/evacuation did not cover all workers e.g. night shift/foreign workers.
Factory has not conducted the hydrostatic test of installed compressor from a competent authority

Findings: non-compliances

ZAF600743353

Non-compliance

Due 2024-07-21

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

207 - Isolated or partial occurrence of blocked fire exits causing an elevated but not significant risk

Verification method

Desktop audit

Description

During the facility tour it was noted that the secondary exit of the first floor was blocked by machine and cannot be used in case of emergency.

Area of non-compliance/non-conformance

Local law

Description (carried over)

During the facility tour it was noted that the secondary exit of the first floor was blocked by machine and cannot be used in case of emergency.

Corrective and preventative actions

It is recommended that the facility shall ensure that all the exits shall be kept clear from any type of obstructions all the time for timely evacuation in case of emergency.

Corrective and preventative actions (carried over)

It is recommended that the facility shall ensure that all the exits shall be kept clear from any type of obstructions all the time for timely evacuation in case of emergency.

Local law reference

In accordance with the Factories Act, 1948, chapter 4, article 32(a): In every factory, passages shall be of sound construction and properly maintained, and shall be kept free from obstruction and substances likely to cause persons to slip. Where it is necessary to ensure safety, steps, stairs, passages and gangways shall be provided with substantial handrails.

Evidence



[Issue Title 207- Blocked Fire Exit.jpg](#)

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600743354

Non-compliance

Due 2024-07-21

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

193 - Fire alarms/smoke detectors in place but isolated case of non-functional equipment

Verification method

Desktop audit

Description

During the facility tour it was noted that hammers were missing from 02 out of 02 fire alarm call points at the second floor.

Area of non-compliance/non-conformance

Local law

Description (carried over)

During the facility tour it was noted that hammers were missing from 02 out of 02 fire alarm call points at the second floor.

Corrective and preventative actions

It is recommended that the facility shall provide the hammers to the identified fire alarms at the second floor.

Corrective and preventative actions (carried over)

It is recommended that the facility shall provide the hammers to the identified fire alarms at the second floor.

Local law reference

In accordance with the Uttar Pradesh Factories Rules (1950), Rule 61(10)(nn), a proper fire alarm system shall be provided if the total capacity of the building is over 500 persons, or if more than 25 persons are employed above or below the ground floor, except buildings where the entire area is undivided and all parts thereof are clearly visible to all occupants

Evidence



[Issue Title 193- Missing Hammer 2.jpg](#)

[Issue Title 193- Missing Hammer 1.jpg](#)

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600743355

Non-compliance

Due 2024-08-20

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.G Provide sufficient first-aid supplies onsite, and ensure that adequately trained personnel are available during all shifts.

Time given to resolve

60 days

Issue title

289 - First aid box available but contents are missing, out of date or otherwise inadequate

Verification method

Desktop audit

Description

During the facility tour it was noted that antiseptic lotion/cream and surgical gloves were not available at the 02 out of 02 first-aid box at the ground floor and first floor.

Area of non-compliance/non-conformance

Local law

Description (carried over)

During the facility tour it was noted that antiseptic lotion/cream and surgical gloves were not available at the 02 out of 02 first-aid box at the ground floor and first floor.

Corrective and preventative actions

It is recommended that the facility shall ensure that such boxes are periodically checked to ensure that they have sufficient and needed first aid supplies all the time.

Corrective and preventative actions (carried over)

It is recommended that the facility shall ensure that such boxes are periodically checked to ensure that they have sufficient and needed first aid supplies all the time.

Local law reference

In accordance with the Factories Act, 1948, Chapter 5, Article 45(1): In every factory, there shall be provided and maintained so as to be readily accessible during all working hours, first-aid boxes equipped with prescribed contents. The number of such boxes or cupboards to be provided and maintained shall not be less than one for every 150 workers ordinarily employed in the factory.

Evidence



[Issue Title 289- Missing First-aid content.jpg](#)



* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600743356

Non-compliance

Due 2024-06-21

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

Immediate

Issue title

222 - Combustible/flammable materials located near a source of fire, heat or spark

Verification method

Desktop audit

Description

During the facility tour it was noted that the combustible materials were kept under electrical panels and switch boards at the ground floor near goods lift area, and printing section at the first floor and digital printing section at second floor.

Area of non-compliance/non-conformance

Local law

Description (carried over)

During the facility tour it was noted that the combustible materials were kept under electrical panels and switch boards at the ground floor near goods lift area, and printing section at the first floor and digital printing section at second floor.

Corrective and preventative actions

It is recommended that facility shall ensure that no combustible material is kept under electrical panels or switch board to minimize fire risk

Corrective and preventative actions (carried over)

It is recommended that facility shall ensure that no combustible material is kept under electrical panels or switch board to minimize fire risk

Local law reference

In accordance with the Indian Electricity Rules 1956, Rule 30 (1), the supplier shall ensure that all electric supply lines, wires, fittings and apparatus belonging to him or under his control, are in a safe-condition and in all respects fit for supplying energy and the supplier shall take due precautions to avoid danger arising on such premises from such supply lines, wires, fittings and apparatus.

Evidence



[Issue Title 222- Combustible material kept near electrical panel 2.jpg](#)

[Issue Title 222- Combustible material kept near electrical panel 1.jpg](#)

[Issue Title 222- Combustible material kept near electrical panel 3.jpg](#)

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600743357

Non-compliance

Due 2024-07-21

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 no emergency light was installed at the secondary exit from second to first floor.

Area of non-compliance/non-conformance

Local law

Description (carried over)

During the facility tour it was noted that no emergency light was installed at the secondary exit from second to first floor.

Corrective and preventative actions

It is recommended that the facility shall provide functional beam focus battery operated emergency lighting near all exits, emergency exits and in the staircases.

Corrective and preventative actions (carried over)

It is recommended that the facility shall provide functional beam focus battery operated emergency lighting near all exits, emergency exits and in the staircases.

Local law reference

In accordance with the U.P (Uttarakhand) Factories Rules (1950), Rule 61(10)(e) the exits shall be clearly visible and suitable illuminated with suitable arrangements, whatsoever 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



[Issue Title 209- Missing Emergency Light.jpg](#) 

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770507

Non-compliance

Due 2025-02-12

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

220 - Failure to comply with legal requirements for electrical safety e.g. inspections

Verification method

Desktop audit

Description

There was no Electrical Safety inspection done by the facility. (Based on document review it was noted that factory has not conducted the annual inspection of 2 DG sets (500 KVA & 320 KVA) & Transformer (600 KVA) from concern government department.)

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

The facility shall ensure that Electrical Safety inspection is done competent authority and record is maintained.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770508

Non-compliance

Due 2025-02-12

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement		Time given to resolve
3.M Ensure all machinery is installed, maintained, and used in a safe manner.	30 days	
Issue title		Verification method
267 - No/inadequate certificates for inspections of machinery, or machines not registered as required by law	Desktop audit	
Description		Area of non-compliance/non-conformance
Factory has not conducted the hydrostatic test of installed compressor from a competent authority.	Base code	
Corrective and preventative actions		
The facility shall ensure that hydrostatic test of installed compressor is done from a competent authority.		

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770509	Non-compliance	Due 2025-02-12
Code area		Status
3 Working conditions are safe and hygienic	Open*	
Workplace requirement		Time given to resolve
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.	30 days	
Issue title		Verification method
240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbunded)	Desktop audit	
Description		Area of non-compliance/non-conformance
Chemical was found stored without any secondary container in chemical store.	Base code	
Corrective and preventative actions		
The facility shall ensure that Chemical are stored with secondary container in chemical store.		

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770510	Non-compliance	Due 2025-02-12
Code area		Status
3 Working conditions are safe and hygienic	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

Area of non-compliance/non-conformance

Base code

Issue title

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

Description

There was Safety equipment like eye washer was not provided in chemical storage area.

Corrective and preventative actions

The facility shall ensure Safety equipment like eye washer is provided in chemical storage area.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770511

Non-compliance

Due 2025-02-12

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

Area of non-compliance/non-conformance

Base code

Issue title

860 - Fire drill/evacuation did not cover all workers e.g. night shift/foreign workers

Description

There was no Fire drill conducted in Night ahift.

Corrective and preventative actions

The facility shall ensure that Fire drill is conducted in Night ahift covering all workers

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770513

Non-compliance

Due 2025-02-12

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.

Issue title

209 - Not all emergency exits are properly marked and lighted

Description

During the facility tour it was noted that no emergency light was installed at the secondary exit from second to ground floor at Gravure machine area and first floor to ground floor near DG set area.

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

It is recommended that the facility shall provide functional beam focus battery operated emergency lighting near emergency exits staircases.

Local law reference

In accordance with the U.P (Uttarakhand) Factories Rules (1950), Rule 61(10)(e) the exits shall be clearly visible and suitable illuminated with suitable arrangements, whatsoever 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.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600770515

Non-compliance

Due 2025-03-14

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

60 days

Verification method

Desktop audit

Issue title

230 - No material safety data sheet (MSDS) obtained/available

Area of non-compliance/non-conformance

Base code

Description

There is no Material safety data instruction available in chemical store area

Corrective and preventative actions

The facility shall provide Material safety data instruction in chemical store area

* PDF generated at 10:40 (UTC) on 13 Jan 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)?	No
Who organises accommodation for workers?	Other (please explain) No Worker accomodation provided
Who organises worker transportation between accommodation and worksite?	Site owned transport
Who organises worker transportation while at work?	Site owned transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes There was no structural addition since last 2 years
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director. is the responsible person for implementation of code on Child labour prohibition in the facility. Policy on Child labour well defined by the management as per ZIR/CLP/01 dated 02-04-2018. Workers are aware about policy on no child labour. The HR department is monitoring for implementation of policy.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Child labour prohibition in the facility. Policy on Child labour well defined by the management as per ZIR/CLP/01 dated 02-04-2018. There was no evidence of child labour obtained during Site round and document verification. The facility has verified and maintained copy of age proof documents like Adhar card, Voter card, School certificate.		

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger 10%

Enter the legal age of employment 15

Enter the age of the youngest worker identified 20

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%

Were there children present on the work floor but not working at the time of audit? No

Do children live at the accommodation provided to workers? Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Wages and benefits. She also monitor the implementation of the code implementation. There was adequate awareness among workers about the wages paid and benefits entitled to them.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.A Ensure that all workers (including non-em... 5.A Ensure that all workers (including non-em...	§1 §2	NC ZAF600743358 NC ZAF600743359
Systems and evidence examined to validate this code section	There was NC reported in this section		

Findings: non-compliances

ZAF600743358

Non-compliance

Due 2024-08-20

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.A Ensure that all workers (including non-employee workers) are paid at least the legal minimum wage or legally recognised collective bargaining agreement (CBA) where one exists, whichever is higher.

Time given to resolve

60 days

Issue title

438 - Isolated instances of workers paid less than the legal minimum wage

Verification method

Follow up audit

Description

During the documents review it was noted that the 02 out of 02 security sampled security guard were paid below the legal minimum wages. As per the payroll of April 2024 those workers were paid gross (INR/Month) 10,000 against the legal minimum wages of gross (INR/Month) 12,500. However, the facility has done the arrear payment of those 02 out of 02 workers on the day of the audit itself.

Area of non-compliance/non-conformance

Local law

Description (carried over)

During the documents review it was noted that the 02 out of 02 security sampled security guard were paid below the legal minimum wages. As per the payroll of April 2024 those workers were paid gross (INR/Month) 10,000 against the legal minimum wages of gross (INR/Month) 12,500. However, the facility has done the arrear payment of those 02 out of 02 workers on the day of the audit itself.

Corrective and preventative actions

It is recommended that the facility shall ensure that all its workers are paid at-least the legal minimum wages as notified from time to time.

Corrective and preventative actions (carried over)

It is recommended that the facility shall ensure that all its workers are paid at-least the legal minimum wages as notified from time to time.

Local law reference

In accordance with the Minimum Wages Act, 1948, Section 12: The employer shall pay every employee engaged in scheduled employment under him, wages at a rate not less than the minimum rate of wages fixed by State Government's notification for that class of employee in that employment.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600743359

Non-compliance

Due 2024-08-20

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.A Ensure that all workers (including non-employee workers) are paid at least the legal minimum wage or legally recognised collective bargaining agreement (CBA) where one exists, whichever is higher.

Issue title

445 - Systemic occurrence of wages not paid on time

Description

During the documents review it was noted that wages for the contracted workers for the sampled month of April 2024 were paid late on 08.05.2024 and for the sampled month of October 2024 were paid late on 08.11.2024. In addition, wages for the on-roll workers for the sampled month of April 2024 were paid late on 09.11.2024 and for the sampled month of May 2023 were paid on 08 and 09.06.2023 respectively. The wages for the contracted security guards for the sampled month of April 2024 were paid late on 09.05.2024.

Description (carried over)

During the documents review it was noted that wages for the contracted workers for the sampled month of April 2024 were paid late on 08.05.2024 and for the sampled month of October 2024 were paid late on 08.11.2024. In addition, wages for the on-roll workers for the sampled month of April 2024 were paid late on 09.11.2024 and for the sampled month of May 2023 were paid on 08 and 09.06.2023 respectively. The wages for the contracted security guards for the sampled month of April 2024 were paid late on 09.05.2024.

Corrective and preventative actions

It is recommended that facility shall adjust its pay dates so that wages are paid on time.

Corrective and preventative actions (carried over)

It is recommended that facility shall adjust its pay dates so that wages are paid on time.

Local law reference

In accordance with the Payment of Wages Act, 1936, Section 5: Payment of wages to every person employed in a factory employing less than 1000 persons shall be made before the end of the 7th day after their work period.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages are based on job skills and experience
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 renumeration

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
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	60.13
	Min per day	480.77
	Min per week	2884.62
	Min per month	12500.0
Actual minimum wage	Actual per hour	60.13
	Actual per day	480.77
	Actual per week	2884.62
	Actual per month	12500.0
Minimum legal overtime wage	Min per hour	120.26
	Min per day	240.52
	Min per week	1443.12
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	Non applicable
	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	10 sample for the month of November 2024 (most recent), 10 sample for the month of July 2024 (random month) and 10 sample for the month of January 2024 (random month)
Are there different legal minimum/ legally recognised CBAs wage grades?	No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Not applicable
Indicate the breakdown of workforce per earnings	% of workers earning legal min wages: 30% % of workers earning more than legal min wages: 70%
Are there any bonus schemes used?	Yes The facility is paying 8.33% of the earned wages as bonus to all the eligible workers
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	There was no NC reported in this section		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The facility established a good management system.</p> <p>The facility has appointed Ms. Harleen Kaur-HR Manager with sufficient seniority who is responsible for implementing procedures.</p> <p>The entity has maintained all policies and procedures, and the relevant person is aware of the requirements.</p> <p>Workers were found trained in the code of conduct and other required/important training.</p> <p>Policies and procedures were found effectively implemented.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The facility established a good management system.</p> <p>The facility has appointed Ms. Harleen Kaur-HR Manager with sufficient seniority who is responsible for implementing procedures.</p> <p>The entity has maintained all policies and procedures, and the relevant person is aware of the requirements.</p> <p>Workers were found trained in the code of conduct and other required/important training.</p> <p>Policies and procedures were found effectively implemented.</p>		

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?	As per the facility's overtime policy they will pay 200% of regular wages to the workers who do the overtime work. However, no overtime work was observed in the sampled month.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Non Discrimination. She also monitor the implementation of the code implementation. There was no evidence of Discrimination practice at work place as evidenced from Interview and record review.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Non Discrimination. The facility has developed Policy on Non discrimination defined as ZIR/EMPP/01 dated 01-11-2015 . There is no Discriminatory practice observed from training , wages payment. During interview, employees confirmed that there is no such discriminatory practice in the facility by management.		

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)?

Representation of women in managerial roles (ratio of women workers to women managers)

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

Three most common nationalities in managerial and supervisory roles

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	Some Improvements Recommended
Explanation for management systems grades	<p>The facility established a good management system. The facility has appointed Ms. Harleen Kaur HR- Manager with sufficient seniority who is responsible for implementing procedures. The entity has maintained all policies and procedures, and the relevant person is aware of the requirements. Workers were found trained in the code of conduct and other required/important training. Policies and procedures were found effectively implemented. There was lack of monitoring for implementation of code as contract worker not provided with appointment letter.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
8. Regular employment is provided	8.A Provide a written contract or other bindi...		NC ZAF600770512
Systems and evidence examined to validate this code section	<p>Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Regular employment provided. Appointment contract has been provided to all the regular employees. Based on the document review it was noted that 06 out of 06 contractual workers were not provided the employment letter with written terms & condition.</p>		

Findings: non-compliances

ZAF600770512

Non-compliance

Due 2025-03-14

Code area

8 Regular employment is provided

Status

Open*

Workplace requirement

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

Time given to resolve

60 days

Issue title

523 - Isolated instances of no contracts/letters of appointment in place

Verification method

Desktop audit

Description

Based on the document review it was noted that 06 out of 06 contractual workers were not provided the employment letter with written terms & condition.

Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

The facility shall ensure that contractual workers are provided the employment letter with written terms & condition.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed 34.78%

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 65.22%

Percentage of workers employed as apprentices, trainees or interns 0.0%

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The facility established a good management system. The facility has appointed Ms. Harleen Kaur HR- Manager with sufficient seniority who is responsible for implementing procedures. The entity has maintained all policies and procedures, and the relevant person is aware of the requirements. Workers were found trained in the code of conduct and other required/important training. Policies and procedures were found effectively implemented.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	There is no subcontracting activities in the facility. No part or process of production is subcontracted. No home worker engaged in any activities		

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 homeworker?				
Are full records of homeworkers available at the site?				
Does the supplier buy products or services from suppliers that use homeworkers?	No No such activities at suppliers end where home workers are engaged.			

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
No Subcontracting activities

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on No Harsh treatment. She also monitor the implementation of the code implementation. The facility does not impose fine on any worker on disciplinary ground. All workers are aware about disciplinary procedure.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	Compliance of code of conduct on No Harsh treatment lies with Ms Shalini Chaddha Exe Director. Disciplinary Action--- ZIR/DP/01 dated 01-11-2015. There is no disciplinary action taken against any worker. Fine register verified and no fine was imposed on any disciplinary ground. Complain and grievance process-- Procedure is well defined and there are one complain box provided near production area at confidential location. Grievance committee--3 from worker and 3 from staff. Last meeting was done on 18-10-2024 and previous meeting done on 13-08-2024. Worker committee--3 from worker and 3 from staff---last meeting 27-11-2024 and previous 18-06-2024. There was workers welfare issue discussed.		

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
What type of grievance mechanism(s) are available?	There is grievance process defined for all employees
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Environment management. She also monitor the implementation of the code implementation. The facility has defined policies for Code on Environment. There was training imparted on Environment management/ waste management to concerned employees. There is lack in monitoring for compliance of legal requirement as per NC reported.

Summary of findings

Code area	Workplace requirement	Local law	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§1	NC ZAF600770514
Systems and evidence examined to validate this code section	Responsibility for compliance of code on Environment -- Ms Shalini Chaddha Exe Director. Policy on Environment management- ZIR/EP/02-04-2018. There is no legal action or fine imposed from pollution control board. The facility has obtained all consents for operation from pollution control board. Air, water and Hazardous waste consent--# UKPCB/HO/CON/Z-2/2022/1442, dated 01-12-2022 valid till 31-03-2025. The facility has not obtained permission from concerned authority for extraction of ground water.		

Findings: non-compliances

ZAF600770514

Non-compliance

Due 2025-02-12

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

Issue title

598 - The site does not have all legally required permits for use and/or disposal of resources (e.g. energy, water, air emissions, waste etc.)

Verification method

Desktop audit

Description

There was no permission taken from concerned authority for use of borewell for ground water extraction

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

The facility shall obtain permission from concerned authority for use of borewell for ground water extraction

Local law reference

According to The Central Ground Water Authority (that is constituted under Section 3 (3) of Environment Protection Act 1986), NOC to extract ground water has to be obtained from the relevant authorities for all Notified and Non Notified Areas.

* PDF generated at 10:40 (UTC) on 13 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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?	The site have necessary environment consent from pollution control board
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?	Yes Environmental objectives and targets are defined

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	Responsibility for compliance of code on Environment -- Ms Shalini Chaddha Exe Director. Policy on Environment management- ZIR/EP/02-04-2018. There is no legal action or fine imposed from pollution control board. The facility has obtained all consents for operation from pollution control board. Air, water and Hazardous waste consent--# UKPCB/HO/CON/Z-2/2022/1442, dated 01-12-2022 valid till 31-03-2025.		

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?	<p>Other (provide details)</p> <p>Policy on Environment management well defined which include reduction of impact , compliance of law etc.</p>
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))?	<p>Yes</p> <p>Monitoring for power and water consumption is available and efforts are there to optimise the consumption</p>
Has the site checked that any subcontracting 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 (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	1,747,656	1,738,056
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	Utility provider	Utility provider
Types of renewable energy used	Data not available	Data not available

Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	7200 Ltr-Diesel	7728 ltr Diesel
Has the site completed any carbon footprint analysis?	No	No
Water sources	Bore well	Bore well
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	36	40
Water discharged	Sewage	Sweage
Water volume discharged (m3)	36	40
Water volume recycled (m3)	0	0
Total waste produced (mt)	131	109
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	1,465	1,689

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Business Ethics. She also monitor the implementation of the code implementation. The facility has defined policies for Code on Business conduct dated 30-01-2015. There was training imparted on Business ethics to the employees.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	Ms Shalini Chaddha Exe Director is the responsible person for implementation of code on Business ethics. Policy defined as per dated 13-06-2018, including Anti bribery and Anti-Corruption, Gift policy, Confidentiality, Conflict of interest. Training given to all employees on dated--19-12-2024,		

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

Policy on Business ethics including Antibribery available

Attachments



[Emergency Light Provided with Exit symbol.jpg](#)



[Fire alarm provided.jpg](#)



[Suggestion Box provided.jpg](#)



[Emergency Exit opening outward direction.jpg](#)



[Printing Department.jpg](#)



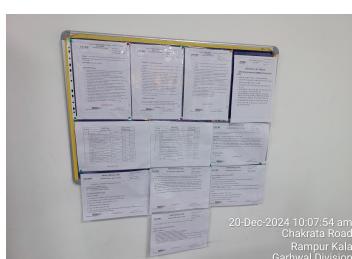
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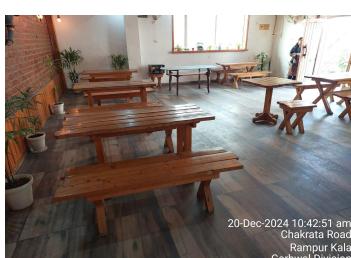
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[First Aid kit.jpg](#)



[Fire Fighting equipments.jpg](#)



[Dinning area.jpg](#)



[Chemical stored without secondary containers.jpg](#)



[Chemical stored without any MSDS, Eye washer.jpg](#)



[Packing section.jpg](#)

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