

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

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

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

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

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

Audit details

Site details

Sedex site reference	ZS1000076241	Site name	THE JAYAVEL IMPEX
Business name	THE JAYAVEL IMPEX	Site address	641607 DOOR NO/ PLOT NO: 7, MURUGASAMY LAYOUT 2ND STREET T.K.COLONY WEST, TIRUPUR, TIRUPUR, IN

Audit details

Sedex company reference	ZC5000064240	Auditor company name	LRQA
Audit company address	Suite 1401, Dorset House Taikoo Place, 979 King's Road Quarry Bay, Hong Kong SAR, CN, HK		
Date of audit	2025-07-23	Audit conducted by	Anandhi Ga
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		
Time in and out	Day 1		Day 2
	In	09:20	In 09:30
	Out	17:45	Out 13:30
Audit type	Full initial		
Was the audit announced?	Semi announced		

Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? RAMASAMY M / GENERAL MANAGER

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 exist in the factory		
Reason for absence during the audit	No Union exist in the factory		
Reason for absence at the closing meeting	No Union exist in the factory		

SMETA declaration

Auditor team

SMETA declaration

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

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

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

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

None

Lead auditor	Anandhi Ga	APSCA Number	21703347
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Additional auditor

Date of declaration	2025-07-24
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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	RAMASAMY M
Title	GENERAL MANAGER
Date of declaration	2025-07-24

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.F Provide all workers with clearly written ...	Base code	NC ZAF601032981
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601032982
	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601032983

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Management systems

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



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

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



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000064240	
Sedex site reference	ZS1000076241	
Company name	THE JAYAVEL IMPEX	
Business ownership type	GOODS	
Site name	THE JAYAVEL IMPEX	
Site name in local language		
GPS location	GPS address	Door no.7, Murugasamy Layout 2nd street, T.K.Colony west, Tirupur district-641607
	Coordinates	Latitude: 11.118896; Longitude: 77.353544;
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	S.Vigneshkumar
	Job title	CEO
	Phone number	9994404237
	Email	vicky@jayavelimpex.in

[← Management systems](#)

[Worker analysis →](#)

Company and site details

Applicable business and other legally required business license numbers and documents

- 1.The facility has valid business license TPR 19242 for employing 100 workers with 50 horse power which is valid till 31/12/2025
- 2.Building plan approval No. E/1011/2022 dated 28.02.2022
- 3.Building Stability certificate dated 28.02.2025
- 4.Fire License No.483/2025; K.Dis.No.2782/A1/2025 (Renewal) dated 24.02.2025, valid for one year
- 5.Certified Standing Order no.B/2685/2018 dated 20.07.2018
- 6.Pressure vessels (Form 8) for Horizontal Air receiver (Capacity- 300Ltrs), dated 21.07.2025, valid for 6 months
- 7.Sanitary certificate number L.Dis.No. 654 dated 20.02.2025
- 8.GST Registration Number: 33AALFT8711A1ZF dated 02.01.2023
- 9.Importer - Exporter Code number 3217503643 dated 09.05.2017

[← Management systems](#)

[Worker analysis →](#)

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of wearing apparel (clothing), except fur apparel
	Secondary	
	Other	
Product type	Creeper, Romper, Full body suits, Jogger sets, Pyjamas / Night wear, Kids & Adults outer wear (T-Shirt, Pants, Shorts, Winter Sweat jackets, Pull overs).	
Process overview	Production process- Fabric inward, Cutting, Sewing, Checking, Ironing, Packing and Dispatch. Production lines- 4 nos. Main equipment- Straight knife cutting machine (1 nos), Rib cutting machine (1 nos), Stain removing machine (2 nos), Metal detector (1 nos), Single needle machine (18 nos), Overlock machine (15 nos), Flat lock machine (7 nos), Kaja machine (1 nos), Button machine (1 nos), Electrical Boiler for ironing machine (2 nos), Compressor (1 nos), Generator (45kva- 1 nos).	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	255m ²

[← Site details](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2022
	If building is shared, provide details	Not a shared building
	Number of floors	5
	Description of floor activities	Ground floor: Fabric storage area, Cutting section, Sample section, Accessories stores, Reception, Creche, Ladies rest room, Hydrant pump station; First floor: Ironing section, Packing section, Checking section, Ladies toilet; Second floor: Sewing section, Ladies and Gents toilet; Third floor: Office area, Conference room, MD Cabin; Fourth floor: Staff toilets, Compressor, R.O.Plant, Gents rest 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

[← Site details](#)

[Worker analysis →](#)

Worker accommodation and transport

Does the site organise worker transport to the worksite?	Not applicable
	The transportation is not needed as all the workers live near the site.

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	90-95%	April	90-95%
	May	90-95%	June	90-95%
	July	90-95%	August	90-95%
	September	90-95%	October	90-95%
	November	90-95%	December	90-95%

Is there any night shift work at the site?	No
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Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other social audit WRAP# 124084 certification period August 21, 2024 to August 21, 2026; BSCI Amfori ID 356-002189-001 valid till 20.03.2026; GOTS (Global Organic Textile Standard) certificate valid till 12.03.2026; GRS (Global Recycled Standard) certificate valid till 22.04.2026;
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Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No No, the site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods of food security of indigenous peoples or the local community.
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[← Site details](#)

[Worker analysis →](#)

Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes The site has conducted Human Rights Impact Assessment (HRIA) dated 01.01.2025
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Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	21 (55.3%)	17 (44.7%)	- -	38 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	21 (55.3%)	17 (44.7%)	- -	38 (100%)
Temporary or fixed term employees	- -	- -	- -	0 (0%)
Agency or subcontracted workers	- -	- -	- -	0 (0%)
Seasonal workers	- -	- -	- -	0 (0%)
Self-employed workers	- -	- -	- -	0 (0%)
Informal workers including home workers	- -	- -	- -	0 (0%)
Apprentices, trainees or interns	- -	- -	- -	0 (0%)

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	2 (100%)	0 (0%)	- -	2 (5.3%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	2 (100%)	0 (0%)	- -	2 (5.3%)

* % of total workforce

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

Only 2 inter state migrant are employed from Bihar state.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	3 (100%)	- -	- -	3 (7.9%)
15 - 17 years old	- -	- -	- -	0 (0%)
Under 15 years old	- -	- -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

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

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Indian	55%	45%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	- -	- -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	- -	- -	- -	0 (0%)
Workers paid hourly / daily rate	- -	- -	- -	0 (0%)
Salaried workers	21 (55.3%)	17 (44.7%)	- -	38 (100%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	- -	- -	- -	0 (0%)
Paid weekly	- -	- -	- -	0 (0%)
Paid monthly	21 (55.3%)	17 (44.7%)	- -	38 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

None

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	3 (100%)	0 (0%)	- -	3
Supervisors or team leaders	1 (33.3%)	2 (66.7%)	- -	3
Administrative staff	0 (0%)	1 (100%)	- -	1

[← Worker analysis](#)

[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

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

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

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

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

Number and size of group interviews Individual- 6 workers
Group- 1 group of 4 workers = 4 workers

Did workers understand the purpose of the audit? Yes

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

[← Worker analysis](#)

[Measuring workplace impact →](#)

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 complaints /Concerns reported. Out of 10 employees interviewed, no Negative feedback received.

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

Communication (e.g. from management)
Equal opportunities
Freedom of movement
Hours worked, rest days or breaks
Job security
Overtime
Work atmosphere (e.g. treatment by supervisors)
Work environment – comfort (e.g. temperature, noise or dust levels)

Additional comments

No negative feedback reported by the employees on working conditions of the site.

Attitude of workers' committee/union representatives

Worker representatives confirmed that there are no unions, however they have committees to express their concerns. The worker representatives are elected by the workers only. There are 3 committees available in the factory- Work force and Grievance committee, Health & Safety committee and Internal Complaints committee. All committee meetings are conducted once in two months and meeting minutes are maintained. Worker representatives confirmed that there is no difference in treatment between workers participating in the committees and those who are not. No negative information reported.

Attitude of managers

The management is found to be co-operative throughout the audit. Provided full access to the auditor throughout the audit process. Answered to all Questions and have given access to all documents.

[← Worker analysis](#)

[Measuring workplace impact →](#)

Workers interviewed by type

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

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	4	0	-	4
Workers interviewed individually	2	4	-	6

[← Worker analysis](#)

[Measuring workplace impact →](#)

Migrant workers interviewed

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

[← Worker interviews](#)

[Measuring workplace impact →](#)

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 (2024)	5.0%	2.5%	-	7.5%
Previous full calendar year (2023)	3.0%	3.0%	-	6.0%

* 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)	8.0%	6.0%	-	14.0%
Last full calendar year (2024)	17.0%	9.0%	-	26.0%
Previous full calendar year (2023)	14.0%	7.0%	-	21.0%

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

Are accidents recorded? Yes

Factory management maintained accident register, however no accidents occurred in the factory till date.

[← Worker interviews](#)

[Code area 0 →](#)

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

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

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

Lost day work cases (per 100 workers)*

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

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

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

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

[← Worker interviews](#)

[Code area 0 →](#)

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

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%
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Percentage of workers that work on average more than 60 total hours in a given week

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		
Systems and evidence examined to validate this code section	Current System: Based on the interaction with employees, management and review of records, 1. The factory management provided full access to the auditor to conduct and complete the audit without any obstruction to all requested documents, interviews and the facility itself. 2. During audit, No attempt to offer bribes. No threatening in any way to induce the auditor to be dishonest, observed. 3. The factory management provided an accurate site description and Sedex site profile prior to audit. 4. The factory management has established Universal Human Rights Policy dated 02.06.2025, approved by General Manager. 5. The factory management has established various social policy like Child Labour Policy, Child Labour Remediation Policy, Discrimination Policy, Disciplinary Policy, Freedom of Association and Collective Bargaining Policy, Forced Labour Policy, etc., approved by the General Manager. Evidences examined: 1. Human Rights Policy dated 02.06.2025 2. Child Labour Policy, Child Labour Remediation Procedure, Recruitment Policy, Forced labour prevention Policy, Anti-Discrimination Policy, Freedom of Association and Collective Bargaining Policy, etc., 3. Awareness training on ETI Base Code dated 05.06.2025		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?

No

Did any workers selected by the auditor decline to be interviewed?

No

1. Employment is freely chosen

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory management has established Forced labour prevention Policy dated 02.06.2025, approved by General Manager. The policy stated their commitments like not engaging prison labour or bonded labour, freedom of movement, voluntary overtime, etc., but details of non-requirement to pay any pre-employment fees or deposits, found missing in their policy. This oversight in policy have not led to an NC, but has a risk of not complying with this Base code in future.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and sustain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit once in 6 months, followed by Management review meetings regularly, to ensure sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 0](#)

[Code area 1.A →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

1. The factory management has established Forced labour prevention Policy dated 02.06.2025, approved by General Manager.
2. The policy stated their commitments like not engaging prison labour or bonded labour, freedom of movement, voluntary overtime, etc., but details of non-requirement to pay any pre-employment fees or deposits, found missing in their policy. However the factory does not require recruitment fees, monetary deposit or deposition of employee's original ID card such as a condition of employment, confirmed during the interview process.
3. All employees go through a personal interview, and verification of their documents like national identification cards or educational certificates for age proofs, and residential proofs, and after a proper screening only they are offered with employment. Photocopies of age, address and educational proof documents are maintained in their individual personal file.
4. Employees are free to leave at the end of their shift and overtime work is not compulsory.
5. The factory does not restrict the employee's freedom of movement.
6. No Prison labours are employed, and the same is not a legal requirement.

Evidences examined:

1. Forced Labour Policy dated 02.06.2025
2. Recruitment procedure dated 02.06.2025
3. Sampled 10 personal files, includes age proof and all required documents
4. Internal audit report dated 11.04.2025 and MRM dated 24.04.2025

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory management has established Recruitment Policy dated 02.06.2025, approved by General Manager. The Recruitment policy defines their process like employee selection, prohibition of hiring underage, non-discrimination during employee hiring, etc., but the details of non-requirement to pay any pre-employment fees or deposits, found missing in their policy. This oversight in procedure have not led to an NC, but are likely to do so in the future.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and sustain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit once in 6 months, followed by Management review meetings regularly, to ensure sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. Only workers with the legal right to work are engaged in work.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 1](#)

[Code area 2 →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

1. The factory management has established Recruitment policy dated 02.06.2025, approved by General Manager.
2. The factory management recruits all employees directly and does not use any labour contractors.
3. The factory management verifies the original photographic identification to validate that all workers have the legal right to work.
4. The factory does not require recruitment fees, monetary deposit or deposition of employee's original ID card such as a condition of employment, confirmed during the interview process.
5. All employees go through a personal interview, and verification of their documents like national identification cards or educational certificates for age proofs, and residential proofs, and after a proper screening only they are offered with employment. Photocopies of age, address and educational proof documents are maintained in their individual personal file.
6. No onsite subcontractors were engaged in any production process.

Evidences examined:

1. Recruitment policy dated 02.06.2025
2. Personal files of sampled workers to check for valid age proofs obtained
3. Workers interview
4. Management interview

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

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

Migrant workers

Do any workers migrate across international borders to work at this site?	No
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[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 5%

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 2 workers from Bihar state - Northern state of India

Recruitment fees

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

What recruitment fees and costs do workers pay during the recruitment and employment process? Workers do not pay any recruitment costs (Please provide details)
Confirmed during the worker interview that workers are not required to pay recruitment fees.

Were recruitment fees or costs identified during worker interviews? No

Worker interview confirmed that no recruitment fees were collected.

[← Code area 1.A](#)

[Code area 2 →](#)

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

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust Management System

The factory management has established a policy on Freedom of Association and Collective Bargaining dated 02.06.2025, approved by General Manager. The policy and instructions are suitable for the site's circumstances and are likely to result in sustainable compliance with the Workplace Requirements in the Base Code Area currently and in the long run.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and sustain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. The workers have formed Work force committee, Grievance committee and Internal complaints committee for workers to collectively bargain and resolve any issues with the management.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 1.A](#)

[Code area 3 →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

- The factory management has established Freedom of Association and Collective Bargaining Policy dated 02.06.2025, approved by General Manager.
- The management interview confirmed that there is no union in the factory and Workers' may join / form union and there is no restriction from management.
- All interviewed employees reported that there are no restrictions in the Factory on forming a union or bargaining collectively, however they do not feel the requirement of the same.
- The workers have formed Workforce Committee and Grievance committee, consisting of representatives of workers and management, through an electoral system. The committee member meets once in 2 months and discuss the work related grievances and minutes of meeting maintained.
- Committee representatives informed during interview that they are not discriminated against and have access to carry out their representative functions in the workplace.

Evidence examined:

1. Freedom of Association and Collective Bargaining Policy dated 02.06.2025
2. Workforce and Grievance committee election record dated 17.05.2025
3. Workforce and Grievance committee meeting minutes
4. Workers interview
5. Management interview
6. Interview with Workforce and Grievance committee Representatives

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

Data points

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

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust Management System

The factory has established the Health & Safety policy, approved by General Manager. The policy and instructions are suitable for the site's circumstances and are likely to result in sustainable compliance with the Workplace Requirements in the Base Code Area currently and in the long run.

2) Resources:

Grade: Robust Management System

The factory management has nominated Mr. P.Dheenathayalan / Production Incharge, as Senior Health & Safety Representative, responsible for developing, implementing and maintaining Health & Safety measures in the Organization. The roles and responsibilities are demonstrated with regards to this Base Code as a written document and communicated. The concern person understood his roles and responsibilities, and has necessary skills and authority to execute.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on Fire safety, Health & Safety and PPE usage for all employees on a regular basis, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit once in 6 months, followed by Management review meetings regularly, to ensure sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. No non-conformances observed in this Base Code.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

[← Code area 2](#)

[Code area 4 →](#)

Systems and evidence examined to validate this code section

1. General Health and Safety management

- The factory management has established Health and Safety policy dated 02.06.2025, which defines the management's commitment in providing the Health and Safety environment.
- The factory management has appointed Mr.P.Dheenathayalan / Production Incharge as Senior Health & Safety Representative, responsible for developing, implementing and maintaining health and safety measures in the organization.
- The factory building observed to be stable & no structural issues observed. The existing building stability certificate was obtained from a competent structural civil engineer on 28.02.2025, valid for 3 years.
- Health & Safety committee was formed and members meet once in two months and discuss health & safety related issues. Minutes of meetings were maintained.
- Health & Safety related Risk Assessment carried out covering all work process, including building infrastructure and preventive measures are taken to mitigate the risk identified.
- The factory management has provided awareness training on Health & Safety and PPE usage, during induction training for newly joining workers, and re-fresher training once in 2 months for existing workers. The training effectiveness are evaluated and records are maintained. However the factory management did not maintain a documented training plan.
- The factory management has provided appropriate PPE like face mask, ear plug for ironers, metal gloves to cutters. Needle guards and Eye guards were provided for sewing machines and the same is properly used by the workers, while working.
- The factory has installed R.O.Plant for water purification, and drinking water is supplied through pipeline to each floor for the worker utilization. The water is tested once in six months regularly, in a lab and results stated that they are fit for drinking purpose.
- No canteen facility provided and same is not a legal requirement, with regards to the employee strength.
- The ventilation, temperature and lighting were found adequate in the production floor.
- Toilets appeared to be sufficient, clean and well stocked with necessary supplies.

2. Fire Safety

- The factory management has obtained Fire license from the local Fire Safety authorities.
- The Fire-fighting equipment like 10 Fire extinguishers (ABC-9 and Co2-1), 8 Fire alarm manual call points, 20 Smoke detectors, 12 Emergency lights, 1 Fire hydrant point, and 4 Hose reels were installed and found adequate and regularly inspected.
- The factory management has installed fire hydrant system, with an underground water tank capacity of 25000 litres. Hydrant pump with 5HP motor, is connected with the generator for auto start during emergency.

- The factory management has provided fire fighter training (live demo training on operating fire extinguishers, fire hydrant and hose reel) to its employees, once in 6 months. And the mock drill training once in 2 months through external agency, as per the legal requirement.
- Totally 20 smoke detectors were installed covering all areas & floors of the factory.
- The factory management has installed horizontal air compressor. The pressure vessel has been inspected by the local authority, once in 6 months, and valid inspection reports are maintained.

3. Electrical Safety

- The factory has made agreement with an electrical contractor, who holds a valid Permit from the electrical authority, to take care of electrical maintenance.
- The factory has installed 1 diesel generator of 62.5 KVA, for secondary power supply.

4. Chemical Safety

- The factory does not use or store hazardous chemicals in its production process. Even diesel used for operating generator are purchased as required and not stored inside the factory premises.
- The MSDS (Material Data Safety Sheet) of diesel is posted on generator in local language for the awareness of the diesel handler.
- The sewing machine oil are purchased only in small quantity in containers, are stored in secondary container, and MSDS displayed near its storage.

5. Medical Safety

- There were 5 First aid boxes provided covering all section and all floor of the factory building. First aid boxes found with sufficient first aid medicines, as prescribed in law.
- There are 5 First Aid trained employees holding valid first aid training certificate from St. John Ambulance, dated 07.06.2025 valid for three years.

Evidences examined:

1. Health and Safety Policy dated 02.06.2025, signed by General Manager
2. Fire safety and Health & Safety Risk Assessment dated 01.07.2025
3. Building plan approval No. E/1011/2022 dated 28.02.2022
4. Building Stability certificate dated 28.02.2025
5. Fire License No.483/2025; K.Dis.No.2782/A1/2025 (Renewal) dated 24.02.2025, valid for one year
6. Pressure vessels (Form 8) for Horizontal Air receiver (Capacity- 300Ltrs), dated 21.07.2025, valid for 6 months
7. Sanitary certificate number L.Dis.No. 654 dated 20.02.2025
8. Drinking water test report no. EFLTTC13268252632 dated 18.02.2025, valid for 6 months

9. First Aid training certificate dated 07.06.2025, valid for three years
10. Mr.P.Shanmugam – Electrical contractor, B- License No. B 119804, valid from 27.12.2022 to 26.12.2026
11. Health & Safety committee meeting – Once in 2 months – latest meeting minutes dated 09.06.2025
12. Mock drill training record of last 12 months, latest training dated 09.06.2025, previous training dated 18.04.2025
13. Fire fighter training record of last 12 months, latest training dated 09.06.2025, previous training dated 18.12.2024
14. Awareness training on Health & Safety and PPE usage dated 05.07.2025

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?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes Building plan approval No. E/1011/2022 dated 28.02.2022 Building Stability certificate dated 28.02.2025
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

4. Child labour shall not be used

Management systems

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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory has established Child Labour Policy and Child Labour Remediation Procedure, approved by General Manager. And the policy missed the management's commitment to adopt the international labor standards, with reference to this Base Code.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and sustain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensured sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. No child labour or young worker employed in the factory.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 3](#)

[Code area 5 →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

- The factory management has established Child Labour Policy dated 02.06.2025, approved by General Manager.
- The factory management has established Child Labour Remediation Procedure dated 02.06.2025, approved by General Manager.
- The Child labour policy and the Recruitment Procedure states that the factory shall not employ workers less than 14 years of age.
- In addition to it, the factory has also displayed a board at the entrance which states that child labour is prohibited.
- There is No young-looking workers observed during factory visit. Youngest worker of the facility seems to be 20 years.
- There are no apparent concerns related to child labour at the factory. No findings observed in this Base Code.

Evidence examined:

- 1.Child Labour Policy dated 02.06.2025
- 2.Child Labour Remediation Procedure dated 02.06.2025
- 3.Recruitment Procedure dated 02.06.2025
- 4.Interview with Worker and Management
- 5.Personal files of sampled employees, maintained with valid age proof documents in the form of national ID card, election card, education and school leaving certificate, etc.,

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	7%
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	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust Management System

The factory has established Policy on Working Hours, Minimum Wages, Overtime, Leave and Maternity Benefit dated 02.06.2025, approved by General Manager. The policy and instructions are suitable for the site's circumstances and are likely to result in sustainable compliance with the Workplace Requirements in the Base Code Area currently and in the long run.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and maintain them.

3) Communication & Training:

Grade: Fundamental improvements required

The factory management provides awareness training on policies and procedures, and training effectiveness are evaluated and recorded. However the sampled workers were not aware of the Gratuity benefits that they are entitled to. This Systemic gap in communications and/or training implementation have led to a non-conformity.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensured sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. No in-consistency in records observed during the payroll review.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.F Provide all workers with clearly written ...	Base code	NC ZAF601032981

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

Based on the interaction with employees, management and review of records,

- The factory management has established Policy on Working Hours, Minimum Wages, Overtime, Leave and Maternity Benefit, approved by General Manager.
- Verified the salary slips & time records of sampled employees for 3 months- June'2025 (Recent month), January'2025 (Random month) and August'2024 (Random month).
- The company follows Hosiery industry minimum wages.
- Wages are paid on or before 7th of every month as cash payment, as per the worker's discretion. All employee wages meets the legal minimum wages.
- Workers confirmed that they receive the wage slip every month, with all necessary details in their local language. As verified during document review wage slips consist of two languages – English and Tamil.
- No illegal deductions were made from the wages of the workers as a disciplinary measure. There were no reports or indications of disciplinary deductions.
- Employees are benefited with social security schemes such as Employee Provident Fund (EPF) & Employee State Insurance (ESI). All social insurance (PF & ESI) remittances were passed on to the relevant authorities on or before 15th of every next month, as per the legal requirement.
- Annual Bonus of 10% from the earned wages, for the period Oct'23 to Sep'24 and annual leave wages (1 day for every 20 days), and casual leave wages (10 days per calendar year) were paid on 29.10.2024, for all employees as per legal requirement.

Evidence examined:

1. Policy on Working Hours, Minimum Wages, Overtime, Leave and Maternity Benefit dated 02.06.2025, approved by General Manager
2. G.O copy of the Hosiery industry minimum wage
3. Employment contract for the sampled workers to examine agreed wage rates and terms & conditions
4. Wage statement & Wage slip for sampled employees for the month of June'2025 (Recent month), January'2025 (Random month) and August'2024 (Random month)
5. Attendance records for sampled employees for the month of June 2025, Jan 2025 & Aug 2024
6. PF & ESI challan remittance record for past 12 months
7. Living wages calculation sheet
8. Bonus, EL & CL wages payment record
9. Production records from work floors to check for discrepancies

Findings: non-compliances

ZAF601032981

Non-compliance

Due 2025-09-27

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.F Provide all workers with clearly written information, in a language workers understand, outlining wage information (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) before employment begins, and with clearly written information relating to any changes of the same during the course of employment.

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

898 - Wage information (rates of and total pay, overtime, payment frequency, deductions, benefits and insurances, and paid leave) is not adequately communicated to workforce

Area of non-compliance/non-conformance

Base code

Description

Observed during the worker interview that 6 out of 10 sampled workers, were not aware of the Gratuity benefits (social benefit eligible for employees working more than 5 years in that organization). However the Gratuity benefit details are mentioned in the employment contract of the workers, which are signed by the workers and maintained in their respective personal file.

Corrective and preventative actions

The factory management shall provide a refresher training regarding Gratuity benefits (eligibility, calculations and when they will receive, etc.,) for all workers, as majority of the workers are working for a long tenure in that organization.

* PDF generated at 12:52 (UTC) on 29 Jul 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 5](#)

[Code area 5.A →](#)

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) Wages are paid on or before 7th of every month as cash payment, as per the worker's discretion.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

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

Is legal wage/legally recognised CBAs data available for any of these options?	Not available	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	48.0
	Max hours per month	208.0

[← Code area 5](#)

[Code area 5.A →](#)

Actual required working hours	Required hours per day	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	Max hours per day	Non applicable
	Max hours per week	12.0
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	1.0
	Max hours per week	2.0
	Max hours per month	5.0
Minimum legal wage	Min per hour	38.25
	Min per day	306.0
	Min per week	1836.0
	Min per month	7956.0
Actual minimum wage	Actual per hour	40.62
	Actual per day	325.0
	Actual per week	1950.0
	Actual per month	8450.0
Minimum legal overtime wage	Min per hour	76.5
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

Actual minimum overtime wage	Actual per hour	81.24
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 workers sampled from the month June 2025 10 workers sampled from the month Jan 2025 10 workers sampled from the month Aug 2024
Are there different legal minimum/ legally recognised CBAs wage grades?	Yes Legal minimum: w. e. f. 1/4/2025 to 31/03/2026(Basic +DA) – INR 443.00/- for Cutting, Tailoring, Ironing, Packing and Fabrication, INR 341.00/- for Checking, INR 324.00/- for Labelling, INR 315.00/- for Hand folding, INR 310.00/- for Damage, INR 306.00/- for Fold & Tie and Assistants.
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce meets legal minimum wage
Are there any bonus schemes used?	Yes Annual Bonus of 10% from the earned wages, for the period Oct'23 to Sep'24 and annual leave wages (1 day for every 20 days), and casual leave wages (10 days per calendar year) were paid on 29.10.2024, for all employees as per legal requirement.
Were accurate records shown at the first request?	Yes

[← Code area 5](#)

[Code area 5.A →](#)

Were any inconsistencies found? No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	Current System: Based on the interaction with employees, management and review of records, •The factory management follows the minimum wages established by the government for Hosiery industry. •The factory management has calculated the living wage based on the industry bench mark, to understand the gap between wages received by workers and what they would need to receive in order to earn a living wage. •The factory pays more than the living wages arrived. The living wage arrived is INR 6981 per month (based on the food basket survey and basic household expenditure). The factory paid minimum wages is INR 7373 per month (Net in hand), which is more than the living wages arrived by the factory.		

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	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust Management System

The factory has established Policy on Working Hours, Minimum Wages, Overtime, Leave and Maternity Benefit dated 02.06.2025, approved by General Manager. The policy and instructions are suitable for the site's circumstances and are likely to result in sustainable compliance with the Workplace Requirements in the Base Code Area currently and in the long run.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and maintain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensured sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. Working hours are found within the legal limit.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 5.A](#)

[Code area 7 →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

- The factory management has established the Policy on Working Hours, Minimum Wages, Overtime, Leave and Maternity Benefit. The working hours are communicated to workers through the employment contract, and displayed in notice board.
- The factory runs in a general shift from 8.45 am to 6.00 pm; with 45 mins lunch break between 12.30 pm to 1.15 pm, and two tea breaks each 15 mins.
- All employees are getting one day off for every 6 days of work. Sunday is the common weekly holiday.
- The factory management maintains manual time card system to monitor the worker's in-time and out-time.
- The Overtime work is voluntary as per their policy, however No overtime work observed in the sampled months.

Evidence examined:

1. Policy on Working Hours, Minimum Wages, Overtime, Leave and Maternity Benefit dated 02.06.2025, approved by General Manager
2. Time record for sampled employees for the month of June'2025 (Recent month), January'2025 (Random month) and August'2024 (Random month)
3. Production records from work floors to check for discrepancies
4. Interview with Worker and Management

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?	Not applicable, as the site pays overtime premium of 200%, as per law requirement.
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?	50.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory has established Anti-Discrimination policy, approved by General Manager. And the policy missed the management's commitment to adopt the international labor standards, with reference to this Base Code.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and maintain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensured sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. No discrimination practise reported by the workers in the interview.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 6](#)

[Code area 8 →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

- The factory management has established Anti-Discrimination policy dated 02.06.2025, approved by General Manager.
- No discrimination reported/observed in hiring, compensation, promotion and termination based on race, caste, national origin, religion, age, disability, gender, marital status and sexual orientation. The factory's job advertisements and interview process were reviewed and the same is confirmed during the interaction with management and workers.
- The factory management stated that they are open to all genders in hiring.
- All employees have fairly equal opportunity for training and other facilities.
- No health checks like HIV test are requested before or during the recruitment process or during employment, confirmed during the interview process.
- The factory management has established Grievance committee where the workers can register their grievances related to work/ employment, to bring into factory management consideration and get resolved. This meeting is held once in two months.
- The employee are provided with Suggestion/ Complaint boxes, to report anonymously.
- There are no apparent concerns with regard to discrimination in any form at the factory. Hence No findings observed in this Code.

Evidence examined:

1. Anti-Discrimination policy dated 02.06.2025, approved by the General Manager
2. Payroll records to check for equal remuneration for equal work
3. Work force and Grievance committee meeting minutes
4. Training records
5. Resignation & Termination records
6. Interview with Management and Worker

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	11%
Three most common nationalities in managerial and supervisory roles	Indians

8. Regular employment is provided

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory management did not maintain any specific policy with regards to this Code, however the recruitment procedure has been established. The policy and instructions are suitable for the site's circumstances and are likely to result in sustainable compliance with the Workplace Requirements in the Base Code Area currently and in the long run.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and maintain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. Written employment contract with terms and conditions are provided to employees in their local language (Tamil / Hindi) understood by the workers.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 7](#)

[Code area 8.A →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

- All employees are directly hired by the factory management, and no labour contractors involved.
- Written employment contract with terms and conditions are provided to employees in their local language (Tamil / Hindi) as understood by the workers, and a copy is maintained in their personal file.
- No false apprenticeship schemes were practiced in the factory. Also, nothing has been reported by the interviewed workers.

Evidence examined:

1. Personal file for Employment contract and Terms & conditions
2. Worker interview
3. Management interaction

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

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

Management systems

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

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory management did not establish any specific policy with regards to Sub contractors or Home workers, as they did not engage any subcontractors in the production process. As a policy with regards to this Base Code in un-documented, the factory management has a risk of not complying with this Base Code in future, if subcontractors or home workers are engaged.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and maintain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented policy with regards to this Base Code, which did not led to a non-conformity, but may have a risk of having in the future.

4) Monitoring:

Grade: Some Improvements Recommended

The factory management conducts internal audit regularly. However the internal audit checklist did not cover this Base Code. As per the management, since they do not engage onsite sub-contractors, this base code requirements are not included in the internal audit checklist. However oversight in the monitoring systems have not led to NCs.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 8](#)

[Code area 9 →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,
 •The factory management did not engage subcontract or Home workers in its production processes, hence all processes are done in-house.

Evidence examined:

1. Production process flow diagram
2. Production records
3. Material inward and outward registers were verified for material movement for home working and subcontractors
4. Interview with Management and Workers

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

Data points

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

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

Confirmed during the management and worker interview that no products or services obtained through homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

No unrecorded work or undeclared sub-contracting observed on site.

[← Code area 8.A](#)

[Code area 9 →](#)

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	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust Management System

The factory management has established Disciplinary procedure. The factory's Certified Standing Order is in place to define the misconducts and disciplinary practice to be followed. This Standing order is available in English and Tamil language, and displayed in notice board for worker's reference.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.Vigneshkumar / CEO, as Management Representative, responsible for the implementation of various Social Standards like SA8000 and BSCI in the Organization. The written document demonstrates the roles and responsibilities, in generic and not specific with regards to this Base Code. The concern person understood his role and responsibilities, however he requires the necessary skills to implement and maintain them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on ETI Base Codes and Company's policies and procedures regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which did not led to a non-conformity, but may have a risk of missing some training in the future.

4) Monitoring:

Grade: Robust Management System

The factory management conducts internal audit regularly. Monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. The interviewed workers stated that their grievances are handled and immediately addressed by the management, and no harsh or inhumane treatment is practiced.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 8.A](#)

[Code area 10.A →](#)

Systems and evidence examined to validate this code section

Current System:

Based on the interaction with employees, management and review of records,

- The factory management maintains The Certified Standing Order, which defines the disciplinary practice to be followed inside the factory and the procedures to handle any misconduct.
- The factory management has established procedure for Disciplinary practices dated 02.06.2025, approved by General Manager.
- There were suggestion / complaint boxes, installed in worker's private area, where workers could report any grievances (harassment, bullying, discrimination etc.), in an anonymous way. Any received complaint would be handled by management, without any reprisal for the worker in question.
- Observed during the document review and interview with management and worker, no evidence to demonstrate that Internal Complaint Committee, which deals with Prevention of Sexual Harassment in the Workplace, was conducted in the factory as per the legal requirement.
- There are no apparent concerns regarding any forms of abuse at the factory, as per worker interview.

Evidence examined:

1. The Certified Standing Order no. B/2685/2018 dated 20.07.2018
2. Procedure for Disciplinary practices dated 02.06.2025
3. Suggestion/ Complaint box register
4. Interview with Worker and Management

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')?	The grievance process is available to all workers
What type of grievance mechanism(s) are available?	1. Employees can directly convey their grievances to the General Manager / MR, Production supervisors, HR staffs and Worker Representatives. 2. Workforce committee and Grievance committee. 3. Suggestion boxes are provided in the private areas, to report anonymously.
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	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

The factory management has established an environmental policy, which defines the management's commitment towards continual improvement and the prevention of pollution in development of the environmental management system. This Base Code Area is generally captured in the policy and procedures, but some gaps have already led to a non-compliance, though this is not necessarily systemic in nature.

2) Resources:

Grade: Some Improvements Recommended

The factory management has nominated Mr.S.Vigneshkumar – CEO, as EMS Representative, responsible and accountable for the continuous improvement of the Environmental Management System, throughout the organization. The concern person understood his roles and responsibilities, however he requires the necessary skills to implement them.

3) Communication & Training:

Grade: Some Improvements Recommended

The factory management provides awareness training on Environmental policy and Waste Management system regularly, and training effectiveness are evaluated and recorded. However the factory management did not maintain a documented training plan, which have a risk of missing some training in the future.

4) Monitoring:

Grade: Fundamental improvements required

The factory management conducts internal audit regularly. However the internal audit checklist did not cover the requirements related to environmental management system. This oversights in the monitoring systems have led to non-conformances which are systemic in nature.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601032982
	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601032983

[← Code area 9](#)

[Code area 10.B →](#)

Systems and evidence examined to validate this code section

Based on the interaction with employees, management and review of records,

- The factory management has established an Environment Policy dated 02.06.2025, approved by General Manager.
- The factory management has set Environmental objectives to minimize their environmental impact and contribute to sustainability.
- Factory has appointed Mr.S.Vigneshkumar – CEO, as EMS Representative, responsible for Environmental Management System.
- The factory management is aware of the local, regional and national environmental laws and found complied with.
- Air quality level, noise level & illumination level are monitored regularly and found within the permissible limits.
- Ambient air quality level, ambient noise level, generator noise level are monitored regularly and found within the maximum permissible limit prescribed by TNPCB.
- The factory did not obtain installation certificate for the diesel generators- 82.5 kva, from the electrical inspectorate, and its stack air emission is not tested, hence non-conformities are raised.
- The factory management has established Waste Management Policy and Procedure dated 02.06.2025.
- Environment related Aspect and Impact study conducted for the activities performed in the factory.
- Factory has made agreement with local merchants to dispose the general (non-hazardous) waste like fabric bits, paper, cardboard, etc.,
- Factory has made agreement with TNPCB approved merchant who collects, restores & dispose, hazardous waste like used/waste oil and E-Waste, and manifest are maintained. Waste / Used oil are disposed to M/s Thirumala Industries, and E-Waste are disposed to M/s Thirumalai E Solutions, who holds valid waste authorization.

Evidence examined:

1. Environmental Policy dated 02.06.2025
2. Environmental Objectives review dated 01.01.2025
3. Environmental Aspect / Impact Assessment Report dated 01.01.2025
4. Waste Management Policy and Procedure dated 02.06.2025
5. Air quality test report dated 18.02.2025
6. Noise level monitoring report dated 18.02.2025
7. Air Ambient and Noise boundary test report dated 18.02.2025
8. Environmental awareness & Waste handling training dated 20.05.2025
9. Waste disposal agreement of used/ spent oil dated 18.02.2025
10. Form 10 (Manifest for Hazardous and other waste)- Waste oil disposal- 45 liters, dated 11.06.2025
11. Waste disposal agreement of E-Waste dated 18.02.2025
12. Form 6 (E-Waste manifest)- E-Waste disposal- 75 kgs, dated 11.06.2025
13. Energy consumption / monitoring log.

Findings: non-compliances

ZAF601032982

Non-compliance

Due 2025-08-28

Code area

10.A Environment 2-Pillar

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

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.)

Area of non-compliance/non-conformance

Local law

Description

Observed during the document review and management interview that the site did not obtain and maintain the installation certificate for 1 out of 1 diesel generator (62.5 kva), installed and running at the ground floor (near main entrance gate), of the production building.

Corrective and preventative actions

The factory management shall obtain the installation certificate for the diesel generator (62.5 kva), from the local authority.

Local law reference

Accordance with Indian Electricity Rules 1956 Rule 47-A, Installation and Testing of Generating Units-Where any consumer or occupier installs a generating plant, he shall give a thirty days' notice of his intention to commission the plant to the supplier as well as the inspector; Provided that no consumer or occupier shall commission his generating plant of capacity exceeding 10 KW without the approval in writing of the Inspector.

Evidence

[← Code area 9](#)

[Code area 10.B →](#)



[NC - Generator \(62.5kva\)
without installation
certificate.jpg](#)

* PDF generated at 12:52 (UTC) on 29 Jul 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601032983

Non-compliance

Due 2025-09-27

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

60 days

Verification method

Desktop audit

Issue title

637 - No monitoring of air emission limits as per legal requirements

Area of non-compliance/non-conformance

Local law

Description

Observed during the document review and management interview that the site did not monitor the stack emission of diesel generator (62.5 kva), installed and running in the site.

Corrective and preventative actions

The factory management shall ensure to conduct stack emission test and ensure that the test results are within the legal permissible limits, and maintain the test reports.

[← Code area 10.A](#)

[Code area 10.B →](#)

Local law reference

In accordance with The Environment (Protection) Rules 1986, Under Rule 3, sub rule 3(A) i) Notwithstanding anything contained in sub-rules (1) and (2) of Rule 3, emission or discharge of environmental pollutants from the industries, operations or processes (other than those industries, operations or processes for which standards have been specified in schedule-I) shall not exceed the relevant parameters and standards specified in schedule VI.

* PDF generated at 12:52 (UTC) on 29 Jul 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 does not have any valid environmental or energy management certificates.

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

No

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

No

[← Code area 10.A](#)

[Code area 10.B →](#)

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 10.A](#)

[Code area 10.C →](#)

Systems and evidence examined to validate this code section

Based on the interaction with employees, management and review of records,

- The factory management has established an Environment Policy dated 02.06.2025, approved by General Manager.
- The factory management has set Environmental objectives to minimize their environmental impact and contribute to sustainability.
- Factory has appointed Mr.S.Vigneshkumar – CEO, as EMS Representative, responsible for Environmental Management System.
- The factory management is aware of the local, regional and national environmental laws and found complied with.
- Air quality level, noise level & illumination level are monitored regularly and found within the permissible limits.
- Ambient air quality level, ambient noise level, generator noise level are monitored regularly and found within the maximum permissible limit prescribed by TNPCB.
- The factory did not obtain installation certificate for the diesel generators- 82.5 kva, from the electrical inspectorate, and its stack air emission is not tested, hence non-conformities are raised.
- The factory management has established Waste Management Policy and Procedure dated 02.06.2025.
- Environment related Aspect and Impact study conducted for the activities performed in the factory.
- Factory has made agreement with local merchants to dispose the general (non-hazardous) waste like fabric bits, paper, cardboard, etc.,
- Factory has made agreement with TNPCB approved merchant who collects, restores & dispose, hazardous waste like used/waste oil and E-Waste, and manifest are maintained. Waste / Used oil are disposed to M/s Thirumala Industries, and E-Waste are disposed to M/s Thirumalai E Solutions, who holds valid waste authorization.

Evidence examined:

1. Environmental Policy dated 02.06.2025
2. Environmental Objectives review dated 01.01.2025
3. Environmental Aspect / Impact Assessment Report dated 01.01.2025
4. Waste Management Policy and Procedure dated 02.06.2025
5. Air quality test report dated 18.02.2025
6. Noise level monitoring report dated 18.02.2025
7. Air Ambient and Noise boundary test report dated 18.02.2025
8. Environmental awareness & Waste handling training dated 20.05.2025
9. Waste disposal agreement of used/ spent oil dated 18.02.2025
10. Form 10 (Manifest for Hazardous and other waste)- Waste oil disposal- 45 litres, dated 11.06.2025
11. Waste disposal agreement of E-Waste dated 18.02.2025
12. Form 6 (E-Waste manifest)- E-Waste disposal- 75 kgs, dated 11.06.2025
13. Energy consumption / monitoring log.

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Responsible use and management of water
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes GOTS
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

Last full calendar year (2024)	Previous full calendar year (2023)
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[← Code area 10.A](#)

[Code area 10.C →](#)

Total electricity consumption from non-renewable sources (kWh)	61,043	51,160
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details) No renewable energy used	Other (provide details) No renewable energy used
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	Diesel	Diesel
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	963	767.5
Water discharged	Drainage system	Drainage system
Water volume discharged (m3)	674	537
Water volume recycled (m3)	0	0
Total waste produced (mt)	13	10.7
Total hazardous waste produced (mt)	0.4	0.5

[← Code area 10.B](#)

[Code area 10.C →](#)

Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	107.7	88.7

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
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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
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Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
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[← Code area 10.B](#)

Management systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust Management Systems

The factory management has established Business Ethics Policy, and Anti-Bribery & Anti-Corruption Policy, approved by General Manager. Responsibilities and processes to implement policies and procedures are clear.

2) Resources:

Grade: Robust Management Systems

The factory management has nominated Mr.S.Vigneshkumar – CEO, as Management Representative, responsible for the implementation of this Code requirement in the site. The concern person understood her role and responsibilities, and has the appropriate authority to manage the Workplace Requirements.

3) Communication & Training:

Grade: Robust Management Systems

The factory management has established an effective training. Training content is updated according to need and the procedure for this is documented. Anti-Bribery & Anti-Corruption Policy awareness training provided for supervisors and managers.

4) Monitoring:

Grade: Robust Management Systems

The monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. No evidence indicates that the auditee is subject to any fines/prosecutions for non-compliance to Business Ethics regulations. The auditee has received, read and acknowledged the Business Ethics policy of the auditor/audit company.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

[← Code area 10.B](#)

Systems and evidence examined to validate this code section

Based on the interaction with employees, management and review of records,

- The factory management has established Anti-Corruption Policy and Procedure for Anti Bribery Investigation, approved by General Manager.
- The Policy stated that the factory maintains the highest standards of ethical conduct, honesty, and integrity by strictly prohibiting bribery and corruption in any form.
- Anti-Corruption Policy awareness training are provided for all staffs & workers by the factory management.
- System in place that effectively allows confidential and anonymous reporting, monitoring and investigation of any fraudulent or unethical business practices without fear of reprisals towards the reporter and employees are aware of the same.
- The factory management has not been subject to any fines/prosecutions for noncompliance to business in the past 2 years.
- The factory obtains and maintains all licenses and permissions relating to the land where the factory operates.

Evidence examined:

1. Anti-Corruption Policy dated 02.06.2025
2. Anti-Corruption Policy awareness training dated 05.06.2025
3. Staff Interview & Management interview.
4. Suggestion / complaint box log

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	No anti-bribery Management Systems certificates available for the site.

[← Code area 10.C](#)

Attachments



[LRQA-IN-SMTA-321174_PhotoForm_V15_1_The Jayavel Impex_23&24.07.2025.pdf](#)



[LRQA-IN-SMTA-321174_Onsite Signed CAPR_The Jayavel Impex_23&24.07.2025.pdf](#)