

SMETA Corrective Action Plan Report (CAPR)



Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - · Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Guidance

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

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

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

Root cause (see column 4)

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

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

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

				Audit I	Details				
Sedex Company Reference: (only available on Sedex System)		ZC41860	1708	Sedex Site Reference: (only available on Sedex System)		ZS418620912			
Business name (C name):	ompany	Jay Agro	Export						
Site name:		Jay Agro	Export						
Site address:		Gat No- 8 Parmori Taluka-D Nashik 422202 IN	30/4, At pos indori	t-	Country:		IN		
Site contact and job title: Mr Ravindra Gunjal / Packhouse Mana					ouse Manager				
SMETA Audit Pillars:		☑ Lab Star	our ndards	Health and Safety (plus Environment 2-Pillar)			Environment 4-pillar Busines Ethics		
Date of Audit:		2023-04-13							
			Aud	it Comp	any Name:				
			D	QS CF	S GmbH				
			Au	dit Con	ducted By				
Affiliate Audit Company	\checkmark		Purchaser				Retailer		
Brand owner		□ NG					Trade U	nion	
Multi-stakeholder					Combined Au	ıdit (s	elect all t	hat app	ly)

Audit Parameters						
Time in and time out	Day 1					
	In	10:00				
	Out	18:30				
Audit type:	FULL_IN	NITIAL				
Was the audit announced?	ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR		Mr Ravindra Gunjal / Packhouse Manager				
Is further information available	No					

Audit attendance	Management	Worker Representatives				
	Senior management	Worker Committee representatives	Union representatives			
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 formed, not legally	/ required.				
Reason for absence during the audit	Worker representative was present during the opening meeting and closing meeting but not present in audit process due to busy in production process. No union formed, not legally required.					
Reason for absence at the closing meeting	No union formed, not legally	No union formed, not legally required.				

Summary of Findings

Issue		a of informity	Number of issues		ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
3 - Working conditions are safe and hygienic	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1	123456 \$\$\$\$\$\$6	8	0	0	NC - bf0deaba-2043-4ab1- a4cb-ecee4b7777ac NC - 28de47d3-87c8-4944- 8952-db9778ef3b76 NC - 77dae5e3-93d2-4ecd- a08f-cc266e7d1ac2 NC - 8b62ebcd-247f-42b0- 8e2d-593450bd96a5 NC - eaca26d3-81da-4ae3- 8ed6-a7967faa64c2 NC - a122ab46-6dae-42b7- 8ecb-ca3920b6d54e NC - 8ae8497e-e751-4938- baf6-4924ed138208 NC - 86aa81d5-de03-4533- a42a-6f5433463b89
9 - No harsh or inhumane treatment is allowed	9.2	§7	1	0	0	NC - 5c193a37-0500-42dc- b053-7bb2c2dbed82

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Local Law Issues

Issue	Description
§1	In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include-(a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.
§2	In accordance with the Factories Act 1948, Section 38 (1) In every Facility, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every Facility all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases. As per section 2.37 of Nation Building Code of fire safety gates. As per IS: 6248, standard reflects that stopper to be well provided on rolling shutters above ground height as per actual state of floor height.
§3	As per Maharashtra Factories Rules, 1963, 9. Fire exits - (a) In this rule (d) In every room of a factory exits sufficient to permit safe escape of the occupants in case of fire or other emergency shall be provided with shall be free of any obstruction. There shall be at least two ways of escape from every room and the exits shall be as remote from each other as possible and shall be arranged to provide direct access in separate directions from any point in the area served. (i) All exits shall provide continuous means of egress to the exterior of a building or to an exterior open space leading to a street.

Audit company: DQS CFS GmbH Report reference: ZAA600008009

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§4	In Accordance with Maharashtra Factories Rules, 1963Rules prescribed under subsection (2) of section 31 and section 112 [65. Safety measures for pressure plant and vessels operated under pressure over atmospheric pressure - (1) In this rule,-(3)(i) Every pressure plant or pressure vessel shall be fitted with- (4) Ever pressure plant in service shall be thoroughly examined by a competent person,- (a) externally once in every period of six months; (b) internally, once in every period of twelve months,
§5	In Accordance with Maharashtra Factories Rules, 1963Rules prescribed under section 11. Fire-extinguishers - An adequate number of suitable types of fire extinguishers or other firefighting equipments, depending on the nature of the chemicals stored in any place in a factory, shall be placed near each such place and such fire-extinguishers or other fire-fighting equipment's shall be regularly tested and refilled. Clear instructions as to how the extinguishers or other equipments should be used, printed in the language which the majority of the workers employed in such factory understand, shall be affixed near each extinguisher or other equipment. Sufficient number of workers shall be trained in fire-fighting practices.
§6	In accordance with the Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.
§7	As per Section 4 of the PoSH Act: A senior female employee should head the PoSH Committee, At least half of the PoSH Committee members should be women, and. One member should be from an NGO or an association that works for women's empowerment.

Corrective Action Plan - Non Compliances

Audit company: DQS CFS GmbH

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	bf0deaba-2043-4ab1-a4cb-ecee4b7777ac	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels	
Subcategory	Electrical risk	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of subsection (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handing, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work.	NC PIC # Insulation mat not placed under electrica Panel.jpg
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the audit process on the day of Audit during Facility tour it was noted that the facility has not provided insulation mat in / under electrical control panel in Utility Section .	
Follow up method	☐ Follow up audit ☑ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	

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Actions	It is recommended to the Facility to provide insulation mat under all electrical panel in the facility .	

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	Non-Compliance	Evidence
[Back to findings s	summary]	
	Non-Compliance	
Status	OPEN	
Reference	28de47d3-87c8-4944-8952-db9778ef3b76	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	214 - No evacuation plan or designated emergency exit route	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the Factories Act 1948, Section 38 (1) In every Facility, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every Facility all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases. As per section 2.37 of Nation Building Code of fire safety gates. As per IS: 6248, standard reflects that stopper to be well provided on rolling shutters above ground height as per actual state of floor height.	NC PIC # Latch not provided in shutter in entrance area.jpg
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	During the site tour in facility, it was observed that there was no provision of latch/Stopper in rolling shutter to hold shutter in case of exit in Entrance area .	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the Facility to Provide	

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latch/Stopper in all rolling shutter.	



	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	77dae5e3-93d2-4ecd-a08f-cc266e7d1ac2	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	214 - No evacuation plan or designated emergency exit route	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	As per Maharashtra Factories Rules, 1963, 9. Fire exits - (a) In this rule (d) In every room of a factory exits sufficient to permit safe escape of the occupants in case of fire or other emergency shall be provided with shall be free of any obstruction. There shall be at least two ways of escape from every room and the exits shall be as remote from each other as possible and shall be arranged to provide direct access in separate directions from any point in the area served. (i) All exits shall provide continuous means of egress to the exterior of a building or to an exterior open space leading to a street.	NC PIC 02 # Aisles not marked in Processing & Packaging Section.jpg
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	NC PIC 01 # Aisles not marked in Processing & Packaging Section.jpg
Explanation to the non compliance	Based on the audit process on the day of Audit during Facility tour it was noted that the Aisles Were not marked in the Grapes Processing Packing section on Ground floor.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the Facility to Mark the Aisles in Grapes Processing Packing section on Ground floor .	

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	Non-Co	mpliance		Evidence
[Back to findings	summary]			
	Non-Co	mpliance		
Status	OPEN			
Reference	8b62ebcd-247f-42	2b0-8e2d-593450	bd96a5	
Clause	3 - Working condit	tions are safe and	d hygienic	
Issue Title	305 - No / inadequ	uate air quality te	st	
Subcategory	Worker Health			
New or carried over?	☑ New	□ Ca	arried Over	
Root cause	☐ Training	☑ Sy	vstem	
	□ Costs	□ La	ick of workers	
	□ Other			
Root cause - Other				
ETI code	provided, bearing the industry and o steps shall be take health arising out	In mind the preva f any specific haz en to prevent acc of, associated wi minimising, so f auses of hazards	idents and injury to th, or occurring in the ar as is reasonably	
Explanation to the non compliance	management inter	raction & docume	day of Audit during ent review it was ut air quality test .	
Follow up method	☐ Follow up audi	it ☑ De	esktop audit	
Timescale	□ Immediate	□ 30 days	☑ 60 days	
	□ 90 days	☐ 120 days	☐ 180 days	
	☐ 365 days	□ Other		
Actions	It is recommended quality test for the Central Pollution (Board .	parameters as I	carried out air Prescribed by tate Pollution control	

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	Non-C	ompliance		Evidence	
[Back to findings summary]					
	Non-C	ompliance]	
Status	OPEN]	
Reference	eaca26d3-81da-	4ae3-8ed6-a7967f	aa64c2	1	
Clause	3 - Working cond	litions are safe and	d hygienic	1	
Issue Title	307 - No / inade	quate noise assess	sment conducted		
Subcategory	Worker Health				
New or carried over?	☑ New	□ Ca	arried Over		
Root cause	☐ Training	☑ Sy	rstem		
	□ Costs	□ La	ck of workers		
	□ Other				
Root cause - Other					
ETI code	provided, bearing the industry and steps shall be ta health arising ou course of work, b	g in mind the preva of any specific haz ken to prevent acc t of, associated wit by minimising, so fa causes of hazards	idents and injury to th, or occurring in the ar as is reasonably		
Explanation to the non compliance	management into	eraction & docume has not carried ou	day of Audit during nt review it was ut noise assessment		
Follow up method	☐ Follow up au	dit ☑ De	esktop audit		
Timescale	□ Immediate	□ 30 days	☑ 60 days		
	□ 90 days	☐ 120 days	☐ 180 days		
	□ 365 days	□ Other			
Actions	It is recommende assessment of the	ed to the Facility to ne facility processir	carried out noise ng area .		

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	a122ab46-6dae-42b7-8ecb-ca3920b6d54e	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	267 - No / inadequate certificates for inspections of machinery, or machines not registered as required by law	
Subcategory	Machinery	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	□ Costs □ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In Accordance with Maharashtra Factories Rules, 1963Rules prescribed under sub-section (2) of section 31 and section 112 [65. Safety measures for pressure plant and vessels operated under pressure over atmospheric pressure - (1) In this rule,- (3)(i) Every pressure plant or pressure vessel shall be fitted with- (4) Ever pressure plant in service shall be thoroughly examined by a competent person,- (a) externally once in every period of six months; (b) internally, once in every period of twelve months,	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the audit process on the day of Audit during management interaction & document review it was noted that facility has not conducted testing of Compressor from competent person .	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate ☑ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the Facility to conduct the testing of Compressor from competent person .	

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	Evidence	
[Back to findings s		
	Non-Compliance	
Status	OPEN	
Reference	8ae8497e-e751-4938-baf6-4924ed138208	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	190 - No fire fighting equipment signage / labelling / instructions	
Subcategory	Fire Safety - Fire Fighting Equipment	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	☐ Costs ☐ Lack of workers	
	□ Other	- ii
Root cause - Other		
Local law issue	In Accordance with Maharashtra Factories Rules, 1963Rules prescribed under section 11. Fire-extinguishers - An adequate number of suitable types of fire extinguishers or other firefighting equipments, depending on the nature of the chemicals stored in any place in a factory, shall be placed near each such place and such fire-extinguishers or other fire-fighting equipment's shall be regularly tested and refilled. Clear instructions as to how the extinguishers or other equipments should be used, printed in the language which the majority of the workers employed in such factory understand, shall be affixed near each extinguisher or other equipment. Sufficient number of workers shall be trained in fire-fighting practices.	NC PIC 02 # Fire Extinugisher instructions not displayed.jpg
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	NC PIC 01 # Fire Extinugisher instruction not displayed.jpg
Explanation to the non compliance	Based on the audit process on the day of Audit during Facility tour it was noted that the Clear instructions as to how to use the Fire Extinguishers was not displayed in the Grapes Processing Packing Area in the facility.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate ☑ 30 days □ 60 days □ 90 days □ 120 days □ 180 days □ 365 days □ Other	
Actions	It is recommended to the Facility to display the Clear	

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instructions as to how to use	the Fire Extinguishers	in
the facility .	· ·	

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	86aa81d5-de03-4533-a42a-6f5433463b89	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	208 - No emergency exits are properly marked and lighted	
Subcategory	Fire Safety - Fire exits	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	
	□ Costs □ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the Factories Act 1948, Section 38 (1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain (a) safe means of escape for all persons in the event of a fire, and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on the facility tour on the day of audit it was noted that factory had not installed emergency light in any of the department.	
Follow up method	☐ Follow up audit ☑ Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	□ 90 days □ 120 days □ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the Facility to install the emergency light for the safe egress in the facility.	

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	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	5c193a37-0500-42dc-b053-7bb2c2dbed82	
Clause	9 - No harsh or inhumane treatment is allowed	
Issue Title	587 - No sexual harassment committee where required by local law	
Subcategory	Grievance Procedures	
New or carried over?	☑ New ☐ Carried Over	
Root cause	☐ Training ☑ System	I
	□ Costs □ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	As per Section 4 of the PoSH Act: A senior female employee should head the PoSH Committee, At least half of the PoSH Committee members should be women, and. One member should be from an NGO or an association that works for women's empowerment.	
ETI code	9.2 - companies should provide access to a confidential grievance mechanism for all workers	
Explanation to the non compliance	Based on the audit process on the day of Audit during Management interaction & record review It was noted that Facility had not engaged / involve the external expert in the POSH committee .However the facility has established the Posh Committee having internal members: only. Last Posh Meeting carried on dated: 03/02/2023.	
Follow up method	☐ Follow up audit ☐ Desktop audit	
Timescale	□ Immediate □ 30 days □ 60 days	
	☑ 90 days ☐ 120 days ☐ 180 days	
	□ 365 days □ Other	
Actions	It is recommended to the Facility to engage the external expert in the posh committee .	

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Date: End Date:

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SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team			
Lead Auditor:	Arun Gupta	APSCA Number:	21705563
Additional Auditors:			
Date of declaration:	2023-04-13		

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

Site Representation	
Full Name:	Mr Ravindra Gunjal
Title:	Packhouse Manager
Date of declaration:	2023-04-13
Comments:	None

Audit company:
DQS CFS GmbH

Report reference: ZAA600008009

Start Date: 2023-04-13

End Date: 2023-04-13



Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a "root cause"

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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

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