

CODE OF PRACTICE

Auditing Standards

Issued August 2025

The auditing standards booklet and our policies are all available or communicated with all suppliers on or through our website.

Section 1 - No Forced Labour or Modern Slavery

- We as a buyer will not tolerate any form of modern slavery, human trafficking, forced labour, bonded or involuntary prison labour.
- Employees shall be free to leave manufacturing sites or residential facilities at any time when they are not working.
- Employees shall be allowed to consult with doctors during working hours.
- No worker shall pay a fee or deposit in order to secure a job.
- No deposit or fee shall be retained for accommodation, tools, training or personal protective equipment (PPE) or for any other reason.
- Workers shall be free to leave/terminate their employment and receive any money owed in full.
- If withholding passports or other ID papers is required by law, workers must always have access to their documentation on demand.
- Loans provided by the employer to an employee shall be subject to a written agreement between both parties with clear repayment terms and always at an affordable and realistic repayment rate.
- No workers shall be forced to work through mental or physical threat, owned or controlled or treated as a commodity by an employer.

CAT 6

- Evidence of Modern Slavery.
- Unreasonable restriction of resignation.
- Unreasonable restriction on access to doctor/medical assistance, during working hours.
- Evidence of workers being trafficked.
- Prison labour if unable to verify voluntary status.
- Restriction of movement in manufacturing or residential facilities, including workers being unable to leave at the end of a standard shift unless necessary for safety/ privacy.
- Fee for employment.
- Retention of original identity documents for employment unless required by law and with worker's consent.
- Financial penalties for leaving.

CAT 5

- Deposit for tools, uniform, PPE or any other reason.
- Employees paying for tools or personal protective equipment, either initially or as a replacement.
- Evidence of owed wages not being to workers when they leave.

MAJOR

- Loans provided at unaffordable repayment rates or without written agreement between employer and employee.
- Unreasonable notice requirements that are not in line with legislative requirements.

MINOR

Isolated instances of missing or incomplete loan agreements.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 2 – Freedom of Association

- Employers shall respect lawful freedom of association. Employees shall be free and able to exercise their right to organise and bargain collectively in the workplace and at industry and national levels.
- Agreed collective bargaining documentation shall be communicated to Employees and available for the workforce to review.
- The Employer shall adopt an open attitude towards the organizational activities of trade unions. There should be open communication channels between Employers and Employees regarding conditions without

threat of reprisal, intimidation or harassment.

- Where local laws restrict freedom of association and trade unions, Employers will allow workers to form worker groups/committees, if they so choose. There must not be an unequal representation of management to workers within these groups/committees. There shall be an equal representation of male and female workers within these groups/committees.
- The Employer shall ensure that any Employee representatives are not discriminated against and have freedom to carry out their representative functions in the workplace. Employee representatives should have access to facilities such as meeting rooms so they can carry out their role, as well as appropriate time off for representatives' activities without loss of pay or benefits.
- Meetings between management and representatives where issues are raised and actions agreed must be documented and communicated to workers.
- In accordance with local legislation, elections for Employee representatives shall be held regularly and the identities of the chosen representatives communicated to all Employees.

CAT 6

Any deliberate action or attempt to restrict freedom of association:

- Deliberate dismissal or discrimination of union members or representatives.
- Anti-union clauses in employment contracts .
- Evidence of a critical communication breakdown between workers and employers which may lead to serious conflict or abuse.

MAJOR

- No worker committee where it is a legal requirement.
- Interference by factory management in the decision making or election process of workers committee representatives.
- Union or worker representatives are not permitted any facilities /sufficient time to carry out their duties, within reason.
- The employer shall ensure that worker representatives are clearly communicated to employees.
- Collective agreements do not meet requirements of legislation.
- Worker representatives are not democratically elected.
- No parallel means where freedom of association is restricted by law.

MINOR

- No documented collective bargaining agreement available for review, where it is a legal requirement.
- No documented notes of meetings between management and representatives of issues raised and actions taken.
- Elections for worker representatives are not held regularly.
- No policy and/or communication to workforce of their right to freedom of association and bargain collectively.
- The employer shall ensure that worker representatives are clearly communicated to employees.
- Unequal representation of management to workers or male / female workers.

15/08/2025

** This is not an exhaustive list and auditor discretion will be applied where appropriate**

Section 3.1 – Health & Safety

Working Conditions

3.1.1 Workplace

- The workplace must be safe, clean and of sound structure.
- Clean and tested drinking water must be provided free of charge, readily accessible at any time and must not be restricted to break times.
- The workplace and all access staircases must be well ventilated and illuminated.
- Employees must be protected from extreme temperatures.
- Workers shall be protected from falling from work platforms, upper floors, ledges, lift shafts and roofs where they are accessed for work or rest purposes.
- Floor and roof openings shall be covered or guarded to prevent falling.

3.1.2 Toilets

- Toilets must be clean and free from foul odour and access not restricted to workers.
- Toilets must be equipped with flushing water and hand washing facilities.
- Clean soap and hand drying facilities shall be provided.
- There must be at least one male room and one female room for every two floors.
- The number of male and female rooms provided should be adequate and proportionate to the workforce and facility layout, to be assessed at the auditor's discretion.
- Toilets shall have doors to protect privacy and any windows shall be opaque.

3.1.3 Canteens

- Food storage, preparation and service areas shall be clean and hygienic.
- Cooks shall be trained in food preparation hygiene.
- If food utensils are re-used, they shall be clean and sterilised.
- Facilities away from the workstation should be provided for eating meals and rest during breaks.

CAT 6

Extremely hazardous working conditions, including but not limited to:

- High risk of any person or material falling from a height that would cause severe injury.
- Premises not structurally safe.
- Severe cracks not investigated (at auditor and Regional Manager's discretion; on a case by case basis).
- Unreasonable restriction on the use of toilets and/or access to drinking water.

CAT 5

- Clean and consumable drinking water not available.
- Extremely poor hygiene, posing a risk to health; i.e. food storage / service / preparation areas, general production area.
- No doors on toilets to give privacy.
- Floor or roof openings which are not guarded.

MAJOR

- No protection from extreme temperatures.
- Severe cracks not investigated.
- Severe lack of ventilation or adequate lighting to enable work to be carried out safely.
- Bins should be provided for the disposal of sanitary and medical waste.

Toilets

- No flushing or washing water.
- No soap available.
- No separated male / female toilets.
- Inadequate level of cleanliness or maintenance of toilets.
- Insufficient number of toilets in ratio to workforce.

Canteens or Rest areas

- Onsite cooks should have the appropriate health and safety certifications and qualifications for food preparation or food hygiene.
- Food utensils re-used whilst uncleaned.
- No facilities provided for rest and/or eating.

MINOR

- Inadequate lighting and/or ventilation.
- System for protection from extreme temperatures is inadequate.

Toilets

- Insufficient toilet or washing facilities.
- No hand drying facilities.
- No locks on doors to give privacy.

Canteens or Rest areas

- Inadequate hygiene in food storage and preparation areas.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 3.2 – Health & Safety

Fire Safety / Evacuation Procedures

3.2.1 Fire Prevention

- Employers shall develop a policy on smoking and communicate it to all Employees.
- Signs shall be posted where smoking is prohibited.
- The smoking policy shall be enforced throughout the site.
- Combustible materials shall be stored at least 5m away from the building.

3.2.2 Evacuation Procedures

- Evacuation plans, including procedure, layout and assembly points, shall be posted in prominent areas in a language that workers understand.
- Emergency drills shall be conducted at least every 6 months in both the workplace and dormitories.
- The procedure shall be documented and communicated to all Employees.
- Employers must develop a written evacuation procedure for emergencies such as fire, chemical spillage, natural disaster and electricity failure.

3.2.3 Walkways, Stairs and Exits

- Fire exits and escape routes shall be adequately signed, well maintained, free from obstruction and easily opened.
- Signage to the nearest fire escape shall be visible from all parts of the premises.
- Main walkways shall be at least one metre (40inches) wide and pathways shall be free from obstruction and tripping hazards all the way to a place of safety.
- Stairs shall have adequate and secure handrails and are clear from obstruction.
- There shall be at least two emergency exits on each floor which lead to a place of safety i.e. an assembly point outside.
- No door or gate leading from a production floor shall have an internal lock.
- No door or gate leading from a production floor shall be locked during working hours.

3.2.4 Fire Awareness

- Workers shall be made aware that in the event of fire, the priority is for them to get out of the building safely.

3.2.5 Fire Protection Equipment

- There should be adequate fire safety equipment in relation to the size and the nature of workplace operations.
- Where smoke alarms are fitted, they must be fully functional at all times.
- Emergency lighting shall be provided in the direction of escape route in case of power failure.
- Fire alarms or other means shall be provided on all floors to warn staff of evacuation.
- All electrically installed fire alarms shall have a back up power supply.
- Fire protection equipment shall be immediately accessible and free from obstruction.
- Fire extinguishers, hydrants, hose reels, sprinklers, smoke/heat detectors, emergency lights and fire alarms shall be inspected monthly for damage and obstruction.
- Fire extinguishers, hydrants, hose reels, sprinklers, smoke/heat detectors, emergency lighting and fire alarms shall be inspected and maintained by qualified personnel annually.

3.2.6 Fire Certification

- Current fire certificate retained on site.
- Approved floor levels and building plans shall be retained on site.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 3.2 – Health & Safety

Fire Safety / Evacuation Procedures

CAT 6

- Inability to show current Fire Certificate (if required by Law & discretion of Auditor).
- No Fire fighting equipment on site. (i.e. : no extinguishers etc.).
- Floor levels not approved/unapproved building plans.
- Extremely hazardous working environment that may result in casualties.
- Locked fire exits.
- No fire alarm system.
- No emergency lighting.
- Fire alarm cannot be heard in all areas.

CAT 5

- Fire Certificate does not cover all floors (e.g. If rooftop is not included in the fire license if required by Law).
- Clear evidence of smoking in production area and/or in hazardous area i.e. chemical store, boiler/generator room.
- Insufficient number of exits.
- Flammable materials and combustible solid/liquid materials stored in stairwells/under stairs/doorways.

CAT 4

- Unacceptably hazardous working environment, to be assessed at the auditor's discretion.

MAJOR

- Evidence of smoking in general production environment.
- Emergency lighting inadequate.
- Access to fire protection equipment is blocked.
- Fire protection equipment is not maintained.
- Blocked aisles or exits, obstructing exit/s.
- Exit doors are not designed to open outwards.
- No evacuation drills carried out/reported/ documented over a year.
- Inadequate and/or poorly maintained fire equipment.
- No back-up power supply for fire alarm system.
- Exits, stairs or aisles are less than one metre (40 inches) wide.
- No visual warning in appropriate area i.e. noisy areas, hearing protection zones etc.
- No fire exit signs.
- No documented evacuation plan or procedure.
- No written procedures for emergencies such as chemical spillage, natural disaster and electrical failures.
- Poor housekeeping.
- No handrails on stairs.
- No integrated smoke detection system/fire detection system (if required by law).

MINOR

- No policy on smoking.
- Evacuation drill not carried out every 6 months.
- Fire exits not adequately signed.
- Inadequate number of fire extinguishers.
- Isolated instances of out of date fire extinguishers.
- Fire drills are not reported and documented in last 6 months.
- Evacuation / emergency procedure not posted prominently throughout workplace.
- No visual inspection or maintenance records of fire equipment including:
- Fire alarm
 - Extinguishers / hoses / hydrants / sprinklers
 - Emergency lighting
 - Smoke / heat detectors
- Isolated instances of blocked aisles or exits, obstructing exit(s)/emergency lighting not working.
- No induction training provided to employees regarding Fire Safety.
- Inadequate fire protection system including -
 - Hoses/hydrants.
- No 'No Smoking' signs in critical areas.
- No designated smoking area.
- No assembly point

Section 3.3 – Health & Safety

Medical Programmes

- The Employer shall provide adequate and appropriate first aid facilities for their
- Employees in case of injury or illness at work.
- To help prevent future accidents, accident procedures should be put in place covering accident reporting and logging, accident investigation and analysis, and learning from accidents to prevent them happening again.
- The workplace shall have at least one qualified first aider on each floor and in each shift, and at least one for every 50 Employees in facilities of under 100 people; for workplaces in excess of 100 Employees, a ratio of one trained first aider for every 100 people or part thereof.
- First aid supplies shall be readily available and managed by designated personnel.
- First aid supplies shall be provided free of charge.
- First aid signs shall be posted with first aid boxes.
- As per local legislation young persons under 18 years of age shall not commence employment until a thorough medical examination is conducted to show they are fit for work. Young persons under 18 years of age shall be subject to repeat medical examinations annually.
- Annual medical examinations shall be provided for Employees using respiratory protection equipment as part of their job.
- Where local legislation requires or where employees are exposed to specific work hazards, Employers shall ensure Employees receive the appropriate periodic medical examinations.
- Where local legislation requires, Employers shall ensure Employees receive medical examinations.
- Annual hearing examinations shall be provided for Employees who are exposed to excessive noise for 8 hours or equivalent.
- Accident reporting channels shall be established and communicated to all Employees.

CAT5

First aid kits available but, a charge is levied for first aid supplies.

MAJOR

- There are no trained first aid personnel.
- No first aid kits available.
- Restricted access to first aid supplies.
- Accidents are not reported/recorded.
- Respiratory or hearing examinations are not carried out for workers using respiratory equipment or who are exposed to excessive noise.
- Other medical examinations not carried out where required by law i.e. designated persons such as young workers, cooks, operators in contact with chemical or operators who work in dusty area.

MINOR

- First Aid box is not signed clearly or appropriately.
- Inadequate number of trained first aid personnel.
- Inadequate numbers of first aid boxes.
- Workers do not know who the trained first aid personnel are.
- Accident reporting does not include 'preventive' action.
- First aid supplies are out of date.
- First aid boxes not adequately stocked or replenished.

** This is not an exhaustive list and auditor discretion will be applied where appropriate**

Section 3.4 – Health & Safety

Chemical Safety

- All chemicals and hazardous substances must be identified and labelled with warning signs in accordance with their chemical properties and legislative requirements. All chemical labelling should be legible and durable, which is easily understandable to the workers.
- Employers should keep an inventory of chemicals used at the site and make this available to workers, including but not restricted to: identification of material; compatibility chart, approximate volumes; flammability; toxicity; hazard potential for ground water and storage location. All Chemicals used on site must be fully risk assessed.

- All chemicals and wastes shall be delivered, handled, stored, transported and disposed of in accordance with its properties and legislative requirements.
- Employees must be trained on the health risk associated with hazardous substances with which they work. Via this training, they should also be familiar with the precautions necessary for their protection.
- Chemicals must not be used without appropriate MSDS (Material Safety Data Sheets) available on site. MSDS must be held for all chemicals and should be made available to employees at the point of use in a language they understand.
- The correct PPE shall be provided for employees handling chemicals.
- Employers shall develop and implement an emergency plan for handling chemical spills and releases.
- Spill kits or absorbents shall be in place in chemical storage areas and in relevant production areas.
- Processes using hazardous chemicals shall be well ventilated and personal exposure monitored and kept below regulatory requirements.
- Eye washing equipment should be provided anywhere there is a risk of splashes in the eye.

CAT 6

Extremely hazardous working conditions;

- Improper handling and storage of large quantities of hazardous chemicals including, exposure and handling of highly toxic, highly flammable and carcinogenic chemicals.
- Storage of hazardous materials in accommodation premises or canteens.
- Sandblasting is carried out at the facilities (see Chemical Management Manual on supplier extranet).
- Sandblasting and shot blasting is carried out at the facilities (see Chemical Management Manual on supplier extranet).

CAT 5

- Extremely poor delivery, storage, labelling, handling, transportation or disposal of hazardous chemicals/substances.
- No OR Extremely poor ventilation in area/s of storage or usage of hazardous chemicals/substances.

MAJOR

- No OR major lack of PPE provided for employees exposed to hazardous chemicals/substances.
- No training provided to employees handling hazardous chemicals/substances and spillage, including the correct use of PPE.
- No systems for safe disposal of hazardous chemicals / substances.
- MSDS not available and not clearly communicated i.e. displayed in local language.
- No spill kits or absorbents in chemical storage areas and in relevant production areas.
- No washing facilities in chemical storage or usage area/s, and next to any battery charging stations, such as eye wash or dousing showers.
- Poor ventilation in area/s of storage or usage of hazardous chemicals/substances.
- Lack of or poor monitoring of exposure to hazardous chemicals/substances.
- Hazardous warning signage not displayed in relevant areas (e.g. flammable, explosive or toxic chemicals etc.).
- Storage areas not clearly defined and segregated for different types of chemicals (Wet and dry chemicals; Hazardous and non-hazardous chemicals; Incompatible chemicals).
- Chemicals haven't been risk assessed.

MINOR

- Isolated instances of MSDS not available.
- Isolated instances of no PPE available.
- Training not clearly documented or updated for workers handling or using hazardous chemicals/substances.
- Isolated instances of chemicals not labelled with names and warning signs.
- No documented spillage procedure.
- No Chemical Inventory available.
- Lids not kept on chemical containers when not in use.
- Each chemical does not have a separate utensil to avoid any cross contamination of chemicals (especially important with dyes).
- Isolated instances of chemicals not being listed on the chemical inventory.
- Chemical containers in poor condition.

Section 3.5 – Health & Safety

Equipment/Machinery

- Employers must ensure that any equipment provided for work is suitable for its intended purpose, maintained in an efficient state, in working order and good repair. Dangerous machinery must be securely guarded.
- Equipment shall be clean and well maintained. All moving parts likely to cause injury shall be effectively guarded. A

maintenance programme shall be in place for all safety devices and guarding.

- Goods and Passenger lifts shall be well maintained and have sufficient safety mechanisms to prevent the opening of doors when the lift platform is not at floor level.
- Goods lifts will not be used in breach of relevant safety regulations and permits.
- Where fitted, emergency stop buttons shall be effective and clearly labelled.
- Portable heating appliances shall be positioned safely.
- Hoists, pressure vessels, boilers and forklifts shall be regularly inspected, properly maintained and documented. These items shall not be used by anyone who has not been trained in their use.
- Machine drains and service lines including steam pipes, compressed air pipes and hot water pipes and tanks shall be regularly inspected and properly maintained.
- Permit-to-work programmes shall be implemented for hot work, electricity work, steam pipe work, pressurised pipe work, tank entry, fire protection equipment impairment, grinding operations and welding.
- Forklifts shall be inspected daily when used, findings recorded and operated by authorised personnel only.
- Gas cylinders shall be securely fixed and separated from incompatibles, and to be at least 5m away from the production area.
- Welding cylinders shall be equipped with flame arrestors and check valves. Welding shall not take place without the operative being supplied with suitable eye and face protection.
- Local exhaust ventilation systems are regularly cleaned and maintained.
- Where flammable materials are stored only safe equipments shall be used e.g. lights and switches.

CAT 6

- Locking devices removed or not functional for goods and passenger lifts.
- There is no automatic stopper sensor on the spinning machines in washing facilities, if deemed life threatening.

CAT 4

Emergency stop buttons ineffective.

MAJOR

- Lack of guarding on heavy machinery i.e. washing/spinning machines.
- Breach of legal requirements on hazardous operations such as boiler inspection and electricity installation and licences of electricians.
- Equipment is not suitable for use, not maintained in an efficient state, in poor working order and in poor repair.
- Forklift trucks or other equipment/machinery operated by unauthorised and/or unqualified personnel.
- Unsafe equipment (including lights and switches) used in storage areas with flammable materials.
- Welding cylinders not equipped with flame arrestors or check valves.
- Maintenance records are not in place or not up-to-date i.e. for machinery, hoists, forklifts, steam pipes etc.
- No permit to work programme for hot work, electricity work, pipe work, tank entry, fire protection equipment impairment, grinding operations and welding.
- No OR major lack of PPE provided for employees who operate welding equipment.
- Portable heating appliances not positioned safely.
- Gas cylinders stored insecurely.
- Local exhaust ventilation systems not properly maintained and cleaned, i.e. heat ventilation, later and automatic cutting machines, printing machines, ironing and pressing machines, etc.)
- Goods lift being used in breach of relevant permits.

MINOR

- Lack of guarding on lighter machinery i.e. sewing/linking machines.
- Isolated instances of missing guarding OR guarding not properly used.
- Emergency stop buttons not clearly labelled.
- No daily check sheets for forklift trucks.
- Drains of machines not connected to the drainage canals.
- Unattended keys left in forklift ignition.

Section 3.6 – Health & Safety

Electrical Safety

- Only trained staff should be allowed to work with electricity, with all electrical systems being maintained so as to prevent danger at all times.
- All portable electrical equipment shall be tested and checked by a qualified person.
- Fixed wiring shall be tested with records available to confirm testing results.
- Qualified electricians shall maintain

electrical equipment and supply.

- All portable electrical equipment shall be grounded and the power connection securely fixed with a socket.
- Electricity mains supply shall be free from obstacles, with warning signs, properly maintained, prevented from unauthorised access and made from non-flammable material.
- No bare wires or buzz bars shall be exposed or be able to be accessed by unqualified persons.
- Only waterproof appliances and supply shall be used outdoors.

CAT 6

Extremely hazardous working conditions:

- High risk from exposed high voltage live cables.
- Live wires are exposed.

CAT 5

Portable electrical equipment not securely fixed with a socket.

MAJOR

- No proof of OR unable to verify in house electrician's qualifications.
- Electrical maintenance carried out by unqualified person/s.
- Non-waterproof electrical appliances and supply used outdoors and in wet areas.
- Portable electrical equipment not grounded.
- Electrical systems not adequately maintained.
- Electricity mains supply:
Obstructed No warning signs Poorly maintained Not guarded from unauthorised access
- Electrical panel boards/bus bars should be made from non-flammable material.
- Electrical installations are not periodically checked and documented. This includes tests for earthing adequacy, insulation resistance, circuit continuity, and the proper functioning of protective devices. Test records should be maintained and available.

MINOR

- Portable electrical equipment not tested and checked by qualified personnel within the last 24 months.

Section 3.7 – Health & Safety

Manual Handling

- No Employee shall be required to lift, carry, push or pull any load which could harm them. In deciding this, the personal abilities of the individual should be taken into account together with the nature of the load, task and the environment.
- Where possible, manual handling should be avoided by providing mechanical handling equipment. Job rotation should be used where repetitive strain injuries could be a risk.
- Manual handling training shall be provided for employees.

MAJOR

- Employees carrying out manual handling tasks beyond their personal abilities including - Lifting, carrying, pushing or pulling.
- Lack of appropriate equipment for safe handling of loads which constitute a serious risk.

MINOR

- No manual handling training carried out or documented.
- No job rotation in place.

** This is not an exhaustive list and auditor discretion will be applied where appropriate**

Section 3.8 – Health & Safety

Job Hazard Assessment

- Where risks are not adequately controlled by other means then the Employer must supply suitable Personal Protective Equipment (PPE), free of charge, to the Employee. Examples may be hearing protection, respiratory protection, eye protection and gloves. The Employer must

ensure the equipment is kept clean, well maintained and used appropriately.

- Chain gloves shall be provided when using electrical cutters in the cutting process.
- Job hazards shall be assessed, identified and communicated to the Employees.
- Warning signs of hazardous areas such as high voltage, confined space, extreme temperatures and asbestos shall be posted.
- Employees shall be trained to use and maintain PPE.
- Signs shall be posted where PPE is required and use of PPE is mandatory.
- When noise level is likely to be higher than the recommended levels, the Employer shall appoint a qualified person to conduct a noise assessment.
- If Employees are exposed to higher than the recommended noise levels for 8 hours or equivalent, the Employer shall eliminate noise sources if possible; otherwise ear protection equipment shall be provided and hearing examinations conducted annually.
- A noise control zone shall be defined and signed where noise exposure exceeds the recommended levels for 8 hours or equivalent. Within this zone, the use of hearing protection shall be mandatory.
- Air quality assessments shall be carried out periodically by a qualified person, in line with the relevant risk factors present on site (e.g. dust, specific chemicals etc.).
- Noise levels shall be reassessed periodically and whenever noise levels have likely increased due to new or amended noise sources (e.g. new or additional machinery).
- Illuminance levels shall be assessed periodically by a qualified person, and whenever the illumination levels have likely decreased due to major layout changes.

CAT 5

No OR extremely insufficient PPE provided to workers in usage of hazardous chemicals/substances. i.e. insufficient respiratory protection/ skin protection for workers in hazardous chemicals/substances spraying.

MAJOR

- Unsuitable/inadequate Personal Protective Equipment (PPE) provided to workers. i.e. insufficient hearing protection in mandatory hearing protection zones or chain gloves not provided when using electrical cutters.
- Hazardous warning signage not displayed in relevant areas (e.g. high voltage, extreme temperatures, asbestos etc.).
- No noise assessment conducted or documented.
- No air quality assessment conducted or documented.
- No illuminance assessment carried out.
- No risk assessment carried out.

MINOR

- PPE not kept clean, not well maintained or not correctly used.
- No training for employees on how to use and maintain PPE.
- Noise control zones not clearly defined.
- Insufficient risk assessments.
- No signage posted where use of PPE is mandatory.

Section 3.9 – Health & Safety

Residential Accommodation

3.9.1 Dormitories

- Where residential accommodation is provided for employees it must be safe and separate to the production area (particularly with regard to fire precaution), clean and provide sufficient space for an individual to live in comfortably. Toilet and washing facilities should be provided with clean running water.
- Dormitories shall not be crowded and living space shall be adequate.
- The conditions of residential accommodation, canteens and toilets/sanitary facilities shall be monitored and recorded to ensure there are no factors which may affect workers' health.
- If the room exceeds more than 12 people, two fire exits which lead to separate places of safety shall be provided.
- Sleeping arrangements shall be adequate and provided with reasonable privacy.
- The building shall have fire fighting equipment, fire alarms, emergency lighting and clear signposting of emergency exits.
- Each Employee must have his/her own bed.
- Lockers shall be provided for personal belongings.
- The building shall be structurally sound and properly maintained.
- Employees can leave and enter the dormitory freely without restriction unless reasonable grounds can be demonstrated for security and safety.
- Residential facilities must be safe in the areas of security, fire protection and electrical safety.
- An evacuation plan must be posted and evacuation drills conducted at least every 6 months.
- Cooking on open flames is only permitted in kitchen facilities and not in living quarters.

3.9.2 Bathrooms

- The number of bathroom cubicles for showering shall be adequate, with a minimum of one shower for 12 people.
- Hot and cold water shall be provided inside the bathroom cubicles for showering.
- Doors or curtains shall be installed in bathroom cubicles to protect privacy.

3.9.3 Toilets

- The number of toilets shall be adequate with a minimum of one toilet for 12 people.
- Toilets shall be clean and free from foul odour.
- Toilets shall be equipped with flushing water and hand washing water facilities.
- There must be at least one male room and one female room for every two floors.
- Toilets shall have doors to protect privacy and any windows shall be opaque.

3.9.4 Canteens

- Food storage, preparation and service areas shall be clean and hygienic.
- Cooks shall be trained in food preparation hygiene.
- If food utensils are re-used, they shall be clean and sterilised.
- Facilities should be provided for eating meals and adequate rest.
- Where applicable, cooks shall undergo a health check annually.

3.9.5 Fire Certification

- Current fire certificate retained on site.
- Floor Levels and building plans approved.

Section 3.9 – Health & Safety

Residential Accommodation

CAT 6

- No Fire fighting equipment on site. (i.e. no extinguishers etc.).
- Fire alarm cannot be heard in all areas.
- No fire alarm system.
- No emergency lighting.
- Locked fire exits.
- Inability to show current Fire Certificate (if required by Law & discretion of auditor).
- Restriction of movement in residential facilities, including workers being unable to leave dormitory freely.
- Floor levels not approved/unapproved building plans.
- Unsafe electrical appliances which could be a risk to life.
- Cooking using flammable liquids and/or open flame inside living quarters.

CAT 5

- Insufficient fire exits.
- Production and dormitory areas are not clearly separated (if required by Law, otherwise it is a major).
- Inadequate provision for hygienic storage and preparation of food.
- Unsanitary living conditions.

MAJOR

- Dormitories overcrowded.
- Personal living space is not separated by gender.
- Each person does not have his/her own bed.
- No personal storage areas.
- Bathrooms/toilets:
Extremely poor toilet and washing facilities. No flushing/washing water provided in toilets. No water provided for showering.
- Inadequate security.
- No evacuation drill carried out in last six months.
- No evacuation plan posted.
- Inadequate privacy in bathroom/toilet cubicles (doors or curtains must be installed).
- Onsite cooks should have the appropriate health and safety certifications and qualifications for food preparation or food hygiene.
- Poor standards of hygiene in canteen/food utensils/rest area.
- Inadequate fire protection system including:
Hoses/hydrants
Emergency lighting
Inadequate number of fire extinguishers

MINOR

- Inadequate personal storage areas.
- Inadequate laundry facilities.
- Inadequate privacy for sleeping arrangements.
- Insufficient number of toilets and not one male room and one female room for every two floors.
- Insufficient number of bathroom cubicles/showers.

** This is not an exhaustive list and auditor discretion will be applied where appropriate**

Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees
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Section 3.10 – Health & Safety

Childcare Facilities

- Childcare facilities shall be clean and safe, be located on the ground floor and have adequate fire safety and first aid equipment.
- Childcare facilities shall be supervised at all times by a ratio of no less than 1 carer for every 8 children.
- Records must be kept of illnesses and injuries.
- All childcare facilities must conform to all Buyer Code of Practice standards.

CAT 6 – Extremely poor safety and hygiene conditions in child care facilities.

CAT 5

No secondary exit.

MAJOR

- Facilities not meeting ratio of one carer to eight children.
- No records of accidents, illness or injury reporting or investigation.
- Aspects of childcare facilities do not conform to BUYER Code of Practice standards.
- Childcare room not on ground floor.

** This is not an exhaustive list and auditor discretion will be applied where appropriate**

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 3.11 – Health & Safety

Environmental Protection Standards

3.11.1 Waste Disposal

- The employer shall identify waste sources and develop a procedure for disposal.
- Hazardous wastes shall be labelled and disposed of properly.
- Disposal records shall also be maintained.
- Hazardous wastes shall be stored in designated and secure areas.
- The containers of hazardous waste shall be in sound condition.
- Training shall be provided for employees handling hazardous waste.

3.11.2 Air Emissions

- The employer shall identify air emission sources and monitor emissions in accordance with regulatory requirements.
- Maintenance programmes and operating procedures should be developed and implemented for in-house air treatment facilities.

3.11.3 Industrial Waste Water Discharge

- The employer shall identify waste water discharge sources and monitor emissions in accordance with regulatory requirements.
- Maintenance programmes and operating procedures shall be developed and implemented for in-house waste water treatment facilities.
- The local authority for waste water discharge shall grant an appropriate license or permit.

3.11.4 Asbestos

- The presence of any asbestos in the workplace shall be identified and steps taken to ensure its condition is monitored and that it is maintained in a safe condition. Anyone working within this environment shall be made aware of the presence of asbestos i.e. clearly labelled.

3.11.5 Storage

- Secondary containment equivalent to minimum 110% of volume of the largest container shall be provided in storage areas for chemical and fuel leakage.
- No drains are allowed inside the storage area.
- Drum storage areas shall be covered to prevent rainwater from coming into contact with drums.

3.11.6 Certification

- Environmental certificates shall be retained on site (if required by law).
 - Sludge disposal license shall be retained on site (if required by law).

**** This is not an exhaustive list and auditor discretion will be applied where appropriate ****

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 3.11 – Health & Safety Environmental Protection Standards

CAT 5

Severe AND/OR deliberate environmental pollution including; direct discharge of contaminated industrial wastewater into inland water receiver i.e. reservoir, lake, pond, etc. without treatment AND/OR large scale contamination of land. (If the remediation cannot be completed within 3 months, the non-conformity can be re-rated to Category 6).

MAJOR

- Hazardous wastes inadequately labelled or disposed of.
- No waste disposal records.
- No training provided in the handling of hazardous waste.
- Hazardous wastes not stored in designated or secure areas.
- Asbestos not maintained safely, or labelled sufficiently.
- Air emissions not monitored in line with regulatory requirements.
- Waste water discharge and emissions not monitored in line with regulatory requirements.
- No maintenance programmes or operating procedures developed or implemented for in-house air treatment facilities.
- No maintenance programmes or operating procedures developed or implemented for in-house waste water treatment facilities.
- Chemical and drum storage areas not covered to prevent rainwater from coming into contact with chemicals and drums.
- Drains inside storage area.
- Insufficient/poorly maintained storage facilities for chemicals, oil, diesel, etc. which lead to contamination of land.
- Hazardous waste/chemical waste disposal vendors not qualified with formal processing agreements, required permits and approvals from the government.
- Environmental certificate is not retained on site (if required by local law).
- Sludge disposal license is not retained on site (if required by local law).

MINOR

- Insufficient/poorly maintained storage facilities for chemicals, oil, diesel etc. (secondary containment must be 110% of volume of primary container).
- Hazardous waste containers in poor condition.
- Empty containers not stored properly in a dedicated area for disposal of waste.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 4 – Child Labour

Child Labour

4.1 Child Labour

- BUYER will not work with companies who continue to use child labour in any of their facilities. A “child worker” is defined as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work.
- Employers shall develop a system to verify the ages of new employees including checking original identity documents and cross-referencing with employee’s photograph.
- Employers shall develop a system to prevent borrowed identity documents including spot-checking the availability of the identity documents of existing employees periodically.
- Copies of age records shall be retained in the workplace.

4.2 Young Workers

- Where young workers are employed in factories (for example aged 15-18) you must also comply with the relevant legal requirements for the region/country your factories are located in. These may include carrying out health and safety risk assessments for young people, restricting working hours and to have the relevant contracts and permissions drafted and implemented.
- Expert opinion and evidence identifies additional health and safety risks to which young workers are exposed, associated with their inexperience, immaturity and lack of awareness of existing risks to their health and safety.
- In recognition of this, Buyer will support employers who introduce both training and educational provision and workplace measures, which seek to minimise those health and safety risks.
 - Risk assessments of the type of work they are required to perform, should be undertaken to avoid exposure to health and safety risks. This should take into account the fitting and layout of their workstation and workplace
 - The nature, degree and duration of any exposure to biological, chemical and physical substances
 - The form, range, use and handling of work equipment and machinery
 - The way in which work processes and activities are organised
 - The job must be conducive to their inexperience and immaturity, e.g. no pressing, no heavy lifting, no exposure to dangerous chemicals and operations
 - Young workers shall receive a health examination where required by law
 - Young workers shall be registered with the local labour bureau where required by law
 - Young workers shall have their contract signed by a parent or guardian, as required by law
- Employers shall protect the young workers from working in hazardous areas.
- A minimum of 20 minutes rest time shall be provided for each 4 hours of work for the young workers.
- Young workers cannot work at night which is defined as any time after 22.00hrs.
- If circumstance exists where young workers cannot leave the workplace due to dependency on company transport, then educational facilities shall also be provided for young workers.
- Supervision of young workers shall comply with a ratio of 1 adult to 10 young workers.
- All young workers shall be subject to any restrictions laid down by local legislation.

4.3 Children in the workplace

- Children are not permitted in the workplace at any time.
- Factories shall have a Child Labour Policy in place.
(See Child Remediation Programme)

Section 4 – Child Labour

CAT 6

Child Labour under 15 years OR legal minimum age.

MAJOR

- Young workers cannot leave the workplace due to dependency on company transport and educational facilities are not provided.
- Systematic inability to verify age of workers.
- Age proof or ID card/s are not checked and copies are not maintained.
- Young workers not protected or in hazardous environments
i.e. using heavy machinery, chemical handling, spot cleaning etc.
- Young workers not registered or recorded with local labour bureau where required by law and subject to legal restrictions.
- No risk assessments carried out for young workers.
- No health examinations for young workers.
- Children present on site, not working, but at risk from the hazards of the workplace i.e. manufacturing, dye houses, mills, printers, tanneries, warehouses, etc.
- A minimum of 20 minutes rest time not provided for each 4 hours of work.
- Young workers are working after 22.00 hours.

MINOR

- No policy for child labour.
- Isolated instances of missing age verification.
- Contracts for young workers not signed by parent or legal guardian, where required by law.
- Insufficient ratio of supervisors to young workers.

Section 5 – Wages and Benefits

- Employee wages for a standard working week should meet or exceed national legal standards or the industry benchmark standards, whichever is higher and be at least sufficient to meet basic needs and provide some discretionary income.
- Wages shall be paid at least monthly.
- The employer shall provide to the employee written and understandable information on the wage calculation including:
 - Hours worked or piece rate if appropriate
 - Pay rate
 - Gross pay
 - Overtime pay
 - Itemized deductions; and
 - Net pay
- Contributions shall be made e.g. social security, pension, tax.
- No deductions shall be made as a disciplinary measure
- If work stoppage is required by the employer, the employees shall be paid at a rate not less than the minimum wage, unless specified by legislation.
- The employer shall pay wages directly to the worker concerned.
- All legally required benefits and bonuses shall be paid to workers/ employees on time and in full.
- Employer to provide and maintain accurate and reliable records. There shall be no inconsistencies between payroll records, payslips, clock cards or other factory documents.
- Workers shall be paid in the legal tender of the country of work, except as maybe otherwise provided by national laws or regulations or collective agreement arbitration award.
- Severances must be paid to all workers/ employees in line with the local law

CAT 6

- Unauthorised deduction of any of wages, including for disciplinary purposes unless allowed by local law.
- Retention of wages – 15 days or more beyond legal payment date.

CAT 5

- Non payment of legal minimum wage.
- Non-payment for work stoppage, if required by law.
- Poor record keeping - Inconsistencies between payroll records, payslips, clock cards or other factory documents.
- Evidence of deliberate falsification of wage records.
- Wages not being paid directly to the worker.
- Unreliable payment records.
- Persistent delayed wages – as per delayed wages (major), but still identified on follow-up audit.

CAT 4

- Contributions not made e.g. social security, pension, tax.
- Severances not paid
- Incomplete or missing wage records but payment of minimum wage can be demonstrated.
- Non payment of all due severance, including (where applicable) payment in Lieu of notice period worked.

MAJOR

- No payslips.
- Cash payments to workers in order to avoid statutory deductions.
- Inadequate information on payslips.
- Legally required bonuses are not paid to workers/ employees.
- Wages are delayed – workers/ employees are paid monthly, beyond the legal date but within 15 days.

MINOR

- Non payment of meal, housing or other benefits where required by law.
- Isolated instances of missing or no payroll records.
- Inadequate information on payslips not provided in the language that workers understand.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 6 - Working Hours

- The work schedule shall be documented and communicated to the employees and include the hours at which work begins and ends, as well as where these duties shall be carried out.
- The employer shall have a system in place to record all employees' working time accurately, including piece rate/hourly/monthly paid.
- An employee's working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week. Working hours must comply with national laws and collective agreements, whichever affords the greater protection for workers.
- The total hours worked in any week shall not exceed 60 hours.
- Working hours may exceed 60 hours in a week only in exceptional circumstances, where all of the following are met:
 - This is allowed by national law
 - This is allowed by a collective agreement freely negotiated with a workers' organization, representing a significant portion of the workforce
 - Appropriate safeguards are taken to protect the workers' health and safety
 - The employer can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents or emergencies.
- Any overtime work shall be voluntary. It is the responsibility of employers to ensure overtime is used responsibly, taking into account all of the following: the extent, frequency of hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay or as national law states, whichever is higher, and should be paid as the frequency of wages. Alternatively, overtime can be compensated as the equivalent time given as paid absence at a suitable later date.
- Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.
- Employers shall post rest days as notices in convenient places within the working establishment. Rest days shall be a full 24 hours.
- Every Employee shall be entitled to a period of paid holiday leave each year, which is in line with local legislation.
- Every employee shall be entitled to take reasonable absence from work on the grounds of genuine incapacity through illness, without financial penalty or threat of dismissal. During any such leave the employee should continue to receive, as a minimum, a reasonable payment to meet basic needs.
- Employers shall ensure safeguarding for night workers who work not less than 7 hours including the interval between midnight and 5am.
- At their request, night workers have the right to undergo a health assessment without charge and to receive advice on health issues associated with their work.
- Rest breaks shall not be shorter than the legal requirement.
- Pregnant, young or female workers shall not work illegal hours as per local legislation.

**** This is not an exhaustive list and auditor discretion will be applied where appropriate****

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 6 - Working Hours

CAT 6

- Compulsory overtime or workers who refuse overtime are penalised e.g. threats of dismissal, pay cuts, demotion etc. Financial penalties or threat of dismissal imposed where a worker is incapacitated through illness
-

CAT 5

- No reliable working hours tracking system.
- No time/hours records AND/OR major inconsistencies between working hours records and other factory records.
- Evidence of deliberate falsification of working hours and wage records.
- Night workers charged for health assessment.
- Rest breaks are not allowed or restricted.
- Workers are unreasonably restricted from taking annual leave.

CAT 4

Systematic AND/OR deliberate failure to pay legal leave entitlement including; statutory/public holidays, annual leave, sick leave or maternity leave.

MAJOR

- Standard working hours systematically exceed 48 per week or local law which is the lower.
- Overtime working hours are excessive and systematic. Regular overtime takes the total hours worked in a week to 60 or more.
- Regular 7 day working.
- Rest breaks are restricted.
- Workers unreasonably restricted from taking annual leave. (Isolated instances)
- Financial penalties or threat of dismissal imposed where a worker is incapacitated through illness .
- Overtime neither paid at a legal premium or time given in lieu.
- Systematic incorrect overtime calculations and payments.
- Pregnant, young or female workers working beyond legally permitted hours or without prior approval from local labour bodies.

MINOR

- Isolated instances of overtime hours exceeding 12 hours per week.
- Isolated instances of working hours that exceed 48 hours per week or local law, which ever is the lower.
- Isolated instances of working rest days (Buyer COP specifies 1 day in 7 or 2 in 14).
- No clear communication of standard hours, overtime hours or rest days to workers.
- Minor or isolated incidents of time records missing or incomplete time records.
- Isolated instances of incorrect overtime calculation or payment.
- Night workers not having health assessments.
- Factory cannot provide evidence of safeguarding for night workers.

Section 7 – No Discrimination is Practiced

- The employment practices and policies

of the workplace shall afford all employees equality of treatment and shall be clearly communicated to workers. Decisions or practices which are based on unfair discriminatory grounds, rather than on merit, will not be acceptable for example:

Discrimination in any form, based on race, colour, language, nationality, ethnic or social origin, religious belief, political opinion, gender, marital status, pregnancy, disability, property, birth, age, sexual orientation, union membership or any other reason shall not be practised.

- No job applicant should be unfairly refused employment or offered employment on less favourable terms due to discriminatory practices.
- All employees should have equal access to jobs, training, promotion and transfer and no one should receive less favourable wages, benefits or access to facilities on grounds of discrimination. The employer shall develop a policy on discrimination of recruiting, wages, benefits, promotion, training, transfer, termination, retirement or access to facilities.
- Employers are expected to adopt and adhere to a fair disciplinary procedure. No employee should face, be threatened with, or receive disciplinary action or dismissal on grounds of discrimination. Similarly, no employee should be unfairly selected for redundancy or lay-off.

CAT 6

A. Evidence of discrimination
e.g.

- Pregnancy testing of employees or potential recruits.
- Dismissal of workers on the grounds of proven discrimination i.e. Pregnant or sick workers.
- Evidence of discriminatory practices in relation to wages & benefits and employment terms (e.g. contract workers versus directly employed workers).
- Women returning from maternity leave not given equivalent position and pay.
- Race
- Colour
- Language
- Nationality
- Ethnic or social origin
- Religious belief
- Political opinion
- Gender
- Marital status
- Pregnancy
- Disability
- Property
- Birth
- Age
- Sexual orientation
- Union membership
- AIDS (*in some countries HIV testing is a legal requirement for all migrant labour i.e. UAE*).

MAJOR

No policies on discrimination AND/OR employment practices.

MINOR

Discrimination policy and employment practices not clearly communicated to workers.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 8 – Regular Employment is Provided

8.1 Hiring & Personnel Practices

- Wherever reasonably practical all workers should enjoy security and stability of employment and regularity of income.
- Employees shall not be required to give or serve unreasonable notice to their employer, should they wish to leave their employment.
- If labour providers are used, the employer shall conduct full compliance audits of working conditions and agency practices and comply with the requirements detailed in the Buyer Agency Labour Policy. Labour providers must hold a relevant valid licence to operate where applicable.
- The employer shall provide to the employee written and understandable labour contracts or a letter of employment. These documents shall at least:
 - include name and location of workplace, employee name, initial wage and job title;
 - be signed as acknowledgement of receipt;
 - be retained by both parties; and
 - be consistent with legislation.
- The employer shall provide documentation detailing working hours, work days, rest days, notice period, entitlement to leave and other benefits, that the employees can refer to at any time. The contents of the document shall also be communicated to the employees.
- Casual workers shall be issued with a contract of employment with the employer in a language understood by the employee. Casual contracts shall outline working hours, location of work, employee's rate of pay, termination of contract agreement and anticipated length of assignment. Casual contracts must not limit casual workers to only work for one employer.
- The following practices are not acceptable:
 - "At will" terminations
 - termination without notice
 - inappropriate use of self-employed status for lower grade worker
 - false apprenticeships
 - changes being made to contracts after being signed
 - probationary periods which exceed legal limits.
- Excessive use of fixed term contracts, home working, sub-contracting or labour only contracting shall not be used to avoid incurring obligations to employees under labour or social security laws which would arise from the regular employment relationship.
- The employer shall verify that all employees have a valid work permit/proof of legal right to work and this verification process shall be documented.

8.2 Subcontractors

- The supplier shall ensure that all subcontractors are in compliance with national and local labour, environmental, health and safety legislation and Buyer Code of Practice standards.
- The supplier shall communicate the Buyer Code of Practice requirements to their subcontractors.
- The supplier shall conduct periodic audits on their subcontractors to ensure compliance.
- All subcontractors involved in the production of Buyer branded products or component parts must be declared to Buyer.

Section 8 – Regular Employment is Provided

CAT 6

- No valid working permit / proof of legal right to work for all employees **JI** (see Migrant Labour Policy).
- Labour providers are charging fees to find work.
- Labour providers are charging workers fees which exceed relevant legal limits e.g. for government passport services or health checks.
- Not receiving detailed employment terms in home country and / or having different contract terms when in country of work (as per Migrant Labour Policy).
- Workers are required to sign blank papers e.g. for use on resignation letters.

CAT 5

- Workers regularly dismissed and rehired to avoid legal obligations under labour and social security laws.
- Labour providers and recruitment processes (including costs) are not evaluated / managed by the Employer while recruiting migrant workers.

CAT 4

Systematic non-payment or non-registering of workers for the purpose of avoidance of payment of social security or other benefits.

MAJOR

- No written and understandable contract or employment terms which comply with local law and are signed by workers.
- Majority of employment documentation does not include contracted working hours, pay rate, work days, rest days, notice period, entitlement to leave and other benefits.
- Copies of contracts / terms of employment not provided to workers.
- Changes made to employment terms after employment contract has been signed by worker.
- Probation period exceeds length of time permitted by law (if local law says this extension is illegal).
- Contracts are not authenticated by the local labour bureau, if required by law.
- Excessive use of zero hour contracts to avoid paying same terms and entitlements as permanent workers.
- No copies of contracts held by company.
- Termination of employment notice and without compensatory payment, if required by law.
- Notice period differs from what is stated in the contract.
- Labour provider does not meet national requirements as a labour provider.

MINOR

- Isolated instances where employment documentation is in place but missing detail i.e. Contracted working hours, etc.
- The factory have not communicated the Buyer Code of Practice requirements to their sub-contractors.

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 9 – Respectful Treatment of Employees

- Corporal punishment, physical, mental or verbal abuse, sexual harassment or other forms of intimidation, harsh, or inhumane treatment shall not be allowed.
- Senior employees shall not ask for or accept bribes from workers either for preferential treatment, or to avoid victimisation.
- The employer shall protect their employees from bullying, verbal or physical harassment (including unreasonable body searches), victimisation, discrimination or physical abuse in the workplace, whether from management, from their colleagues or from members of the public.
- The employer shall develop written grievance and disciplinary procedures for

- the workplace and communicate these to the employees.
- A fair disciplinary and grievance procedure shall be established and adhered to in all cases of alleged employee misconduct or unsatisfactory performance.
 - All disciplinary and or grievance measures must be recorded.
 - An appeal channel shall be developed and implemented for employees facing disciplinary action.
 - The employer shall provide a credible grievance redressal mechanism for the workplace, please refer to Buyer Effective Grievance Mechanism Policy.

CAT 6

- Verbal abuse including shouting or swearing, or other forms of verbal abuse or inappropriate reprimand.
- Persons of authority i.e. supervisor/ security person intimidating or attempting to control the workforce.
- Any form of physical abuse or corporal punishment.
- Any form of sexual abuse or harassment.
- Clear evidence of managers or supervisors asking for or taking bribes including sexual favours from workers for preferential treatment or to avoid victimisation.
- Unreasonable personal body searches (including by opposite gender).

MAJOR

- No formal written rules, disciplinary or grievance procedure(s).
- No appeal channel to the disciplinary (and grievance procedure if required by law).
- Disciplinary or grievance procedures not communicated clearly to management, supervisors and workers.
- Failure to implement disciplinary action against supervisors/ managers or fellow workers who abuse or behave inappropriately towards employees.
- Where disciplinary action has been taken, lack of documented actions and measures.
- No effective grievance redressal mechanism in place.

MINOR

- Inadequate disciplinary or grievance procedure(s).
- Incomplete disciplinary action records.

**** This is not an exhaustive list and auditor discretion will be applied where appropriate****

No Forced Labour	Freedom of association	Health & Safety	Child Labour	Wages & Benefits	Working Hours	No Discrimination is practiced	Regular Employment	Treatment of Employees	Management Systems
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Section 10 – Management Systems

- The employer shall be fully aware of and able to demonstrate that they are in compliance with local legislation and Buyer Code of Practice requirements.
- The Supplier shall develop a system to ensure compliance with legislation and Buyer Code of Practice standards. This system shall include:
 - Assignment of personnel to be responsible for overall labour, environmental, health and safety performance;
 - Line management accountability for labour, environmental, health and safety issues; disciplinary actions for violation of labour, environmental, health and safety rules with documentation maintained; identification of environmental, health and safety hazards in the workplace; identification of training needs and plans for training; and continual improvement of labour, environmental, health and safety performance.
 - For all areas of compliance, true and accurate records must be maintained.
 - Reasonable participation in the audit process by factory management and workers
- The employer shall provide training for all new employees as follows:
 - Induction training to include work schedule, wages, wage calculation, work days and rest days, entitled leave, workplace rules, dormitory and canteen rules (if any), disciplinary procedure and grievance procedure, plus any other relevant information.
 - Environmental Health and Safety awareness training to include, evacuation, fire prevention, accident reporting, electrical safety and asbestos, chemical handling, waste management (where applicable), plus any other relevant information.
 - Job specific training to include in-depth training that enables the Employees to be capable of carrying out their job competently. Examples of job specific training are self-audit training and accident investigation training.
- Training records shall include information such as training date, training content, trainers and attendees, plus any other relevant information.
- The work place, canteen and dormitory rules shall be posted in prominent areas in local language.
- All suppliers should maintain accurate production records.

CAT 6

- Unreasonable refusal of audit (at auditor and Regional Manager’s discretion).
- Action by management and/or workers to avoid reasonable participation in the COP audit process e.g. management concealing workers or workers running away.
- Severe breach of local legislation and / or Code of Practice standards and policies, i.e Buyer Shared Premises, Buyer Migrant Labour, Buyer Child Labour policy, etc.
- Proven falsified records.
- Stage 3 escalation of RSC; specific to Bangladesh.

CAT 5

- Lack of reliable production records, (under auditor discretion).
- Stage 2 escalation of RSC; specific to Bangladesh.

CAT 4

Stage 1 escalation of RSC; specific to Bangladesh. A B

MAJOR	MINOR
- Inability to show business licences. - Inability to show factory licences including approved canteen licence, wastewater discharge licence, operating licence for treatment plants. - Lack of assigned personnel for overall labour, environmental, chemical, health and safety within the workplace, if required by law.	- Inability to verify any area of COP requirements through lack of records/ documents. - Induction training not provided to employees AND/OR not recorded. - Company rules not communicated clearly to all employees.

** This is not an exhaustive list and auditor discretion will be applied where appropriate**

No Forced Labour

Freedom of association

Health & Safety

Child Labour

Wages & Benefits

Working Hours

No
Discrimination
is practiced

Regular
Employment

Treatment of Employees

Management
Systems

[illegible]