

# Monitoring result for SRP Sweaters Limited on site Site 1

## Monitoring

Monitored Party : **SRP Sweaters Limited**  
amfori ID : **050-002144-000**  
Site : **Site 1**  
Site amfori ID : **050-002144-001**  
Address : **73/1, North Kha para Road, Awochpara, Tongi,**  
: **1230, Gazipur**  
: **Dhaka**  
: **Bangladesh**  
Monitoring Activity : **amfori Social Audit - Manufacturing**  
Monitoring Type : **Full Monitoring**  
Monitoring Partner : **Bureau Veritas Hong Kong Limited**  
Monitoring Start Date : **15/10/2022**  
Closing Meeting : **15/10/2022**  
Finished Date  
Submission Date : **17/10/2022**  
Expiration Date : **17/10/2023**

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## Overall rating



## Section rating

PA1: Social Management System	D
PA 2: Workers Involvement and Protection	C
PA 3: The Rights of Freedom of Association and Collective Bargaining	A
PA 4: No Discrimination	C
PA 5: Fair Remuneration	A
PA 6: Decent Working Hours	A
PA 7: Occupational Health and Safety	D

PA 8: No Child Labour	A
PA 9: Special Protection for Young Workers	A
PA 10: No Precarious Employment	A
PA 11: No Bonded Labour	A
PA 12: Protection of the Environment	B
PA 13: Ethical Business Behaviour	A

## General description

This was an announced amfori BSCI full audit at SRP Sweaters Limited. The factory has been established in 2017 at 73/1, North Kha Para, Auchpara, Nishatnagar, Tongi, Gazipur, Bangladesh. Factory was closed from 2000 to February 2022 due to ownership change of the factory. Later factory reopened and started its production on March 2022. The factory specializes in the manufacture of all kinds of sweater items. The main production process is Winding > Jacquard > Linking > Mending > Sewing > Washing > Finishing > Packing. June to September is the peak seasons of the factory. Production capacity of the facility is 1, 30,000 pieces per month. Total area is about 36500 square feet and production area is about 26000 square feet.

In view of facilities, the facility consists of 01 building. Floor wise site description is as below-

### Building# 1

Ground Floor: Warehouse (Yarn store), yarn controller room, finished goods store, childcare room, medical center, generator room, washing section, boiler room, electric sub-station room, maintenance room.

1st Floor: Finishing section, pressing section, sewing section, electric boiler room, inspection rooms, conference room and rest of the area under renovation.

2nd Floor: Sample section, linking section, linking distribution room, coning section and rest of the area under renovation for trimming section, mending section, light check section.

3rd Floor: Auto knitting (Jacquard section) section, yarn distribution room, knitting part inspection area, UPS room, office area

4th Floor (Tin shed roof top): Winding section, lunch room, canteen, male prayer room, wastage storage area, compressor room, knitting part open machine and rest of the area open roof top.

Factory did not provide dormitory facility to their workers.

Factory is maintaining electronic time keeping system where workers in-time & out-time with workers & management acknowledgement in daily basis for all workers. There were 97 employees (78 males & 19 females) working in the factory and the youngest worker was above 18 years in the factory, which was complying with the local law. Neither migrant workers nor agency workers were found in the facility.

Per payroll review and interviews with management and employees, all the workers were paid by monthly wage system. Wages were paid and issued once in a month within first 7 working days of the following pay period. Last payment date was on October 08, 2022 to all workers for the month of September 2022. Employees' wages paid by cash. Factory had provided lowest minimum wage as BD. Tk-8000/- to the workers that meet the local law. Main Export markets of the facility are in Russia-20%, USA-25%, UK- 40%, and Italy-15%. Main Customers are Proxma Textile Ind -15%, AM London-10%, Whispering Smith-15%, NOI International-20%, JSC Melon Group-05%, Crazy Line-10%, Ruckfild-05% and Befree-20%, etc.

The regular working hour of the factory was 8:00 am to 5:00 pm with 60 minutes' lunch break from 01:00 pm to 02:00 pm. Weekend of the factory was Friday till August 14, 2022 but after that facility has changed and maintaining weekend into Tuesday now as per new government circular. The factory's wage calculation period is from 1st to 30th/31st of every month.

Two auditors conducted the audit on October 15, 2022. During opening meeting auditors explained about the audit scope and process and a detail description about the amfori BSCI new requirements and approach. Immediately after the opening meeting a floor visit was conducted with factory management. A general document checklist was also provided to the management and supplied documents were reviewed. The auditor verified randomly last one year documents (October 2021 to September 2022) and documents were available in the factory.

As per payroll and time records review, auditors reviewed sample records of 15 employees from September 2022 (attendance & Payroll) as current month, July 2022 (attendance & Payroll) as Peak Month & May 2022 (attendance & Payroll) as Off Peak month. All were permanent workers in the factory. Based on attendance records, maximum working hours were 02 hours in a day and 60 hours in a week.

A total of 15 selected employees (12 males and 03 females) from different sections were conducted individually and group interviews. According to the interviews, employees were satisfied with the working conditions in positive way toward regarding the timely payment, non-discrimination, and non-forced labor in the factory.

At the end of the audit, a closing meeting was held with factory representative; all of the current findings along with corresponding corrective action plans were disclosed and communicated to facility management and Manager (Admin & Accounts) signed the onsite CAP and agreed to take corrective actions.

Audit Company: Bureau Veritas Consumer Products Service  
Audit Company APSCA Number: 11600002

Lead Auditor Name: Iffat Fatema Jahan  
APSCA Auditor Registered Number: RA 21701632

Team Auditor: Junaid Hasan- RA 21701260

Note: Facility did not use contractor for so, no license or permit is required. No agency labor contractor used by the factory. Factory recruited all workers directly. No Government waiver is applicable for this auditee, No Collective bargaining agent in the facility.

Remarks:

1. The factory management was convenient in English. So they requested to the auditors to provide the Corrective Action Plan in English.
2. Facility has conducted a survey on Living wage on employees of the facility and the monthly fair remuneration scan in the area is BDT. 13630.00. Facility has calculated the living wage taking consideration the cost of Food, Education, Transportation, Clothing, Energy & Water consumption, Housing etc. Besides, the factory management shows good understanding of possible gaps existing between the actual remuneration and the fair remuneration figure in the area.

## Site Details

Site : Site 1  
Site amfori ID : 050-002144-001

### GICS Classification

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Sector : Consumer Discretionary  
Industry Group : Consumer Durables & Apparel

Industry : Textiles, Apparel & Luxury Goods  
Sub Industry : Apparel, Accessories & Luxury Goods

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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N.A.

### Water Stress Situation

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N.A.

## Metrics

### Key Metrics

Total workforce	79 Workers
Legal minimum wage in local currency	8000 Monthly
Lowest wage paid for regular work at the site	8000 Monthly
Calculated living wage in local currency	13630 Monthly
Total sample	15 Workers

### Other Metrics

Male workers	63 Workers
Female workers	16 Workers
Permanent workers - Male	78 Workers
Permanent workers - Female	19 Workers
Temporary workers - Male	0 Workers
Temporary workers - Female	0 Workers
Seasonal workers - Male	0 Workers
Seasonal workers - Female	0 Workers
Management - Male	3 Workers
Management - Female	0 Workers
Apprentices - Male	0 Workers
Apprentices - Female	0 Workers
Workers on probation - Male	10 Workers
Workers on probation - Female	0 Workers
Workers with night shift - Male	0 Workers
Workers with night shift - Female	0 Workers
Workers with disabilities - Male	0 Workers
Workers with disabilities - Female	0 Workers
Domestic migrant workers - Male	0 Workers
Domestic migrant workers - Female	0 Workers
Foreign migrant workers - Male	0 Workers
Foreign migrant workers - Female	0 Workers
Workers hired directly - Male	78 Workers
Workers hired directly - Female	19 Workers
Workers hired indirectly - Male	0 Workers
Workers hired indirectly - Female	0 Workers
Unionised workers - Male	0 Workers
Unionised workers - Female	0 Workers
Workers under CBA - Male	0 Workers
Workers under CBA - Female	0 Workers
Pregnant workers	0 Workers
Workers on parental leave - Male	0 Workers
Workers on parental leave - Female	0 Workers
Sample - Male	12 Workers
Sample - Female	3 Workers

## Findings

### PA1: Social Management System

1.1 It was noted that the factory is trying to adopt requirement of amfori BSCI COC, they have lacking in commitment towards integrating the BSCI Code into their business culture, understand the content of the amfori BSCI Code and Terms of Implementation for business partners to be involved in the amfori BSCI monitoring process, understand the need to develop the internal procedures to integrate the amfori BSCI Code into day-to-day business practices. This violates amfori BSCI Performance Area 1.1

Management understand English and they were comfortable in English.

1.2 It was noted that facility management has nominated a senior management person but he did not receive any training or go through the amfori BSCI system manual yet to have comprehensive knowledge on amfori BSCI core requirement. Moreover, no formal team was formed comprising staffs of different sections assigning their responsibility for proper implementation of amfori BSCI Code in every function. This violates amfori BSCI Performance Area 1.2

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1.3 It was noted that factory did not establish proper policy and procedures on monitoring social performance of business partners as they did not describe the monitoring system of social performance of business partners in the procedure. As such there is no system of evaluating the social performance of their sub-suppliers and sub-contractors. Furthermore, auditee did not keep records of any complaints received about its business partners. This violates amfori BSCI Performance Area 1.3

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### PA 2: Workers Involvement and Protection

2.1 It was noted that formation procedures of Participation Committee (PC) were selected by the management instead of elected by the workers. Moreover, facility management did not send participation committee's meeting minutes to the labor directorate within seven days after the meeting. This violates amfori BSCI Performance Area 2.1 This violates with Bangladesh Labor (amendment) Law 2013, section-205(6) This violates with Bangladesh labour Law 2006, section 207 (2)

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2.2 It was noted that facility has made mission, vision and long term goals for the facility. However, it was not aligned with BSCI requirements as they did not define step-by-step approach toward sustainable improvements and step by step process for making significant improvements. Also, long term goals are not set with the involvement of workers and workers representative and no strategic plan has been developed to achieve the goals. This violates amfori BSCI Performance Area 2.2

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2.4 It was noted that 12 out of 15 sampled workers were not aware about the requirements of amfori BSCI Code of Conduct. This violates amfori BSCI Performance Area 2.4

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2.5 It was noted that factory did not have proper grievance handling procedure to address complaint from the workers through verbal or written communication because potential conflicts of interest, process for appeals, investigation process and grievances solving time frame have not been considered in the procedure. Besides this, factory did not record any verbal grievance which was coming from workers and no record was found how those verbal grievances were solved. Further, no grievance satisfaction survey conducted for business partners and communities yet by the facility. This violates with amfori BSCI Performance Area 2.5;

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### PA 3: The Rights of Freedom of Association and Collective Bargaining

3.1 It was noted that formation procedures of Participation Committee (PC) were selected by the management instead of elected by the workers. Moreover, facility management did not send participation committee's meeting minutes to the labor directorate within seven days after the meeting. This violates amfori BSCI Performance Area 3.1 This violates with Bangladesh Labor (amendment) Law 2013, section-205(6) This violates with Bangladesh labour Law 2006, section 207 (2)

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### PA 4: No Discrimination

4.1 It was noted that facility did not Conduct an internal assessment on the most frequent grounds used for discrimination as well as the most common activities through which discrimination may occur (e.g. hiring process, increment, promotion, overtime etc). This violates with amfori BSCI Performance Area 4.1

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## PA 7: Occupational Health and Safety

7.1 It was noted that some lacking's were observed in the Health and Safety System applicable in the occupational health and safety regulations in the factory activities. Thus, relevant issues were noted in some areas to improve in the Health and Safety section. This violates amfori BSCI Performance Area 7.1;

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7.4 It was noted that, the safety committee of this facility was not formed engaging elected participation committee members as per legal requirement as, the facility did not form participation committee through election procedure yet. This violates amfori BSCI Performance Area 7.4; This violates Bangladesh Labor Rules 2015, Rule 81 (6);

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7.5 a. It was noted that facility did not conducted fire drill once in a six months by informing Fire service and Civil Defense authority. Moreover, facility management did not kept fire drill record as per the format prescribed by law as Date of drill, signature of worker representatives, etc. information was not mentioned in the record. Moreover, photo graphic evidence also missing for fire drill. This violates amfori BSCI Performance Area 7.5; This violates with Bangladesh Labour Rules 2015, Section 55 (14); b. It was noted that facility did not have trained fire fighting team as per law. This violates amfori BSCI Performance Area 7.5; This violates with Bangladesh Labour Rules 2015, Rules: 55(10)

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7.6 It was noted that 1 of 1 coning machine operator, 25 of 31 Auto knitting (Jacquard) operators, 3 of 3 winding machine operators were not using ear plug. This violates amfori BSCI Performance Area 7.6; This violates Bangladesh Labor Law 2006, Chapter 5, Section 53(1), This violates Bangladesh Labor Rules 2015, Chapter 6, Section 67(3),

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7.7 It was noted that MSDS were not posted for 60% of the chemical using in the factory. Moreover, facility did not arrange secondary containers for the chemical using in the factory. This violates amfori BSCI Performance Area 7.7; This violates Bangladesh Labor Law 2006, Chapter- 5, Section – 53, This violates The Labour Rules, 2015, Chapter-7, Section-68 (10), This violates Bangladesh Labor Law 2006, Chapter- 6, Section – 78(1), This violates Bangladesh Labor Law 2006, Chapter- 6, Section – 78 (2),

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7.8 It was noted that factory did not developed accident and emergency procedure to reduce the accident and serious danger threatens workers' safety and health. This violates amfori BSCI Performance Area 7.8;

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7.10 It was noted that factory did not develop any system in place to analyze the injury & taken corrective action by identifying root cause which will improve the occupational health and safety. Moreover, workers did not receive any training on how to prevent and respond to the most frequent accidents or injuries that happen in their area of work. Also, no procedure in place for reporting near misses and did not set any reporting channel for report and record near misses. This violates amfori BSCI Performance Area 7.10;

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7.11 a. It was noted that currently the factory management is using 02 generators with capacity of total 224 KW (24 KW +200 KW) but no permission found for the all 02 generators. This violates amfori BSCI Performance Area 7.11; This violates Bangladesh Energy Regulatory Commission License Regulations, 2006, Section 9; b. It was noted that facility management could not provide any building lay out plan for review. This violates amfori BSCI Performance Area 7.11; This violates Bangladesh Labor Law 2006 (Amendment) 2013, Chapter- 20, Section – 319 (6), c. It was noted that no certificate or NOC collected for the Mini boiler (5 kg) from the concern authority. This violates with amfori BSCI Performance Area 7.11 This violates with The Boilers Act, 1923, Section-6;

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7.14 It was noted that 2 of 2 checked fire hose pipes were non-functional as water pressure was very low. Moreover, smoke detectors were not installed in the warehouse (Yarn store), finished goods store on the ground floor, wastage store on the 4th floor of the building. This violates amfori BSCI Performance Area 7.14; This violates with Bangladesh Labour Rules, 2015, Rules 55-1(d) This violates Instruction Number F.S.O. CD/4409/4(120) Section 2.1.5 dated 9/11/97 This violates Bangladesh Labor Law 2006, Chapter- 6, Section – 62,

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7.17 It was noted that 6 of 12 rubber pipes of pressing machines were not wrapped on the 1st floor of the building. Moreover, incoming & outgoing steam pipes of pressing machines of electric boilers were not wrapped on the 1st floor of the building. Furthermore, needle guards were not installed for 7 of 8 single needle sewing machines. In addition, 11 of 11 linking machines & 1 of 1 coning machine, 1 of 1 knitting part open machine did not have any upper pulley guards. This violates amfori BSCI Performance Area 7.17; This violates Bangladesh Labour law 2006, Section-63, This violates Bangladesh Labour Law, 2006, Chapter-5, Section-52,

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7.19 It was noted that facility management has developed emergency procedure deal with trauma & serious illness but factory did not provide any training to the workers on the emergency procedure of trauma & serious illness. This violates with amfori BSCI Performance Area 7.19;

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## PA 10: No Precarious Employment

10.2 a. It was noted that facility did not maintain nominee form for randomly checked 15 out of 15 employees of the facility. This violates amfori BSCI Performance Area 10.2; This violates with The Labour Rules, 2015, Form- 41, b. It was noted that facility management did not provide service book to the 15 out of 15 sampled workers as per law. This violates amfori BSCI Performance Area 10.2; This violates Bangladesh Labor Rules 2015, Rule 19(5); C. It was noted from plant tour that provided ID cards to the workers were not as per the requirement as some information were missing like Blood group & National ID number etc. This violates amfori BSCI Performance Area 10.2; This violates Bangladesh Labor Rules 2015, Rule 19(5);  
Management understand English and they were comfortable in English.

## PA 12: Protection of the Environment

12.4 It was noted that auditee did not identify and separate the type of waste generated (hazardous versus non-hazardous, including packaging and other material) in the factory. Further, facility did not have any agreement with authorized waster contractor to dispose different type of wastages of the factory. Moreover, facility did not maintain waste disposal record and did not provide awareness to the employees on waste management. This violates amfori BSCI Performance Area 12.4. This violates with Bangladesh Labour Law, 2006, section: 54;  
Management understand English and they were comfortable in English.

12.5 It was noted that a. factory management did not take any initiative on water management about water management such as how to reduce the waste of water, how to increase the conservation of water and what steps they need to take for implement that program. b. Auditee did not have proper identification of water springs, rivers, lakes and other water ecosystems in the area of facility. c. No documented risk assessments that justify management decisions on water use. d. No awareness training has provided to the staff and workers by the facility on proper use of water. e. Facility management did not collect water extraction permission from the respective authority. f. No consumption record was maintained for daily water withdrawal and water use. This violates with amfori BSCI Performance Area 12.5  
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## PA 13: Ethical Business Behaviour

13.1 It was noted that facility has developed an anti-corruption policy but facility does not have a procedure in place to investigate the incident of corruption (if any) and reward system was not included in the policy to encourage the employees to detect any corruption if occur in the facility. Further, no ethical training is provided to employees to avoid or minimize any types of corruption. This violates with amfori BSCI Performance Area 13.1  
Management understand English and they were comfortable in English.