




SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC: 414368861	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS: 414552107
Business name (Company name):	Sap Print Solutions Private Limited		
Site name:	Sap Print Solutions Private Limited		
Site address: <i>(Please include full address)</i>	Plot No. 30, Sector-2, The Vasai Taluka Industrial Co-Op Estate Ltd., Gauraipada, Vasai East, Dist. Palghar, Maharashtra – 401208.	Country:	India
Site contact and job title:	Mr. Silvester D'Costa - Plant Manager & Mr. Dinesh Suratkal – Sr. Manager Marketing		
Site phone:	+91 98925 57823 & +91 98202 63821	Site e-mail:	d'costa@sapprints.com & dinesh@sapprints.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar
			<input type="checkbox"/> Business Ethics
Date of Audit:	04 th May 2022 / Desktop Reviewed Date 15th June 2022		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Sap Print Solutions Private Limited
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Report written in black = Periodic Audit / 04th May 2022

Report written in Blue = Desktop Review / 15th June 2022

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

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

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

Any exceptions to this must be recorded here (e.g. different sample size): None

Auditor Team (s) (please list all including all interviewers): Pralhad Magdum Lead Auditor

Lead auditor: Pralhad Magdum

Team auditor: None

Interviewers: Pralhad Magdum

Desktop Reviewed Date 15th June 2022

Report writer: Pralhad Magdum

Report reviewer: Pooja Nayyar – Report Reviewer-SM

Date of declaration: 04th May 2022

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

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

Audit Parameters

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:30 AM Day 1 Time out: 06:15 PM	Day 2 Time in: N/A Day 2 Time out: N/A	Day 3 Time in: N/A Day 3 Time out: N/A
B: Number of auditor days used:	1.0 Manday audit i.e., 01 Auditor x 01 day		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input checked="" type="checkbox"/> Partial Other –Desktop Review If other, please define:		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Silvester D'Costa - Plant Manager		
H: Is further information available (if yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	31 st March 2021		
J: Previous audit type:	Initial / Announced / Onsite		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		
Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i>	Worker representative was present in opening meeting & during audit process. However, not present in closing meeting as closing meeting was conducted after his working hour.
E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i>	No union exists in the facility.

Guidance

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

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

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

Root cause (see column 4)

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

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

Next Steps:

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

Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90,180,365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
03: Safety & Hygienic Conditions	New – 01	<p>Description of non-compliance: It was noted from review of records that Fire No Objection Certificate dated 07.04.2021 obtained from the concerned authority found expired on dated 06.04.2022. Facility has applied for renewal on dated 07.03.2022 & acknowledged by fire dept. on dated 02.05.2022 but has not obtained renewed fire No Objection Certificate yet.</p> <p>Law / ETI Requirements: In accordance with Section 21 of "The Maharashtra Fire Prevention and Life Safety Measures Act, 2006". The responsibility of maintaining fire and emergency service is of planning authorities' i.e., local authority or planning authority. In the state of Maharashtra, the subject of Fire Services is the basic responsibility of Urban Local Bodies such as Municipal Corporation & Municipal Councils. For the Developments beyond the municipal areas such as MIDC, CIDCO, SEZ's,</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>Recommendations: It is recommended to the facility to obtain valid Fire No Objection Certificate from the concerned authority.</p>	30 days	Desktop	Yes, Mr. Silvester D'Costa - Plant Manager		<p>Closed on 15th June 2022 by Desktop Review</p> <p>Closed on SEDEX on 15th June 2022</p>

		Private Town Ships etc in accordance with circular No. MFS/2015/1600 dated 16th October 2015 from office of fire adviser.							
03: Safety & Hygienic Conditions	New – 02	<p>Description of non-compliance: It was noted during site tour that facility has not provided self-battery backup emergency light at the external staircase used as emergency exit located at rear side of the building.</p> <p>Law / ETI Requirements: In accordance with the Maharashtra Factories Rules, 1963 rule no. 70. Fire Protection, sub rule 9. Fire exits, point (e) The exit shall be clearly visible and suitably illuminated with suitable arrangement, whatever artificial lighting is to be adopted for this purpose, to maintain the required illumination in case of failure of the normal sources of electric supply</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>Recommendations: It is recommended to the facility to provide self-battery backup emergency light at the external staircase used as emergency exit located at rear side of the building.</p>	30 days	Desktop	Yes, Mr. Silvester D'Costa - Plant Manager		<p>Closed on 15th June 2022 by Desktop Review</p> <p>Closed on SEDEX on 15th June 2022</p>
03: Safety & Hygienic Conditions	New – 03	<p>Description of non-compliance: It was noted from review of records & management interaction that facility does not conduct regular inspection / checking of firefighting & fire safety equipment's like fire hydrant points, hose reel, fire alarm system & emergency light installed in their premises.</p> <p>Law / ETI Requirements: In accordance with The Factories Act, 1948 section 7A. General duties of the occupier-(1) Every occupier shall ensure, so far as is reasonably practicable, the health, safety and</p>	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>Recommendations: It is recommended to the facility to conduct regular inspection / checking of firefighting & fire safety equipment's like fire hydrant points, hose reel, fire alarm system & emergency light installed in their premises.</p>	30 days	Desktop	Yes, Mr. Silvester D'Costa - Plant Manager		<p>Closed on 15th June 2022 by Desktop Review</p> <p>Closed on SEDEX on 15th June 2022</p>

		welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risk to health; (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances; (c) the provisions of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work; (d) the maintenance of all places of work in the factory in a condition that is safe and without risks to health and the provision and maintenance of such means of access to, and egress from, such places as are safe and without such risks; (e) the provision, or maintenance or monitoring of such working environment in the factory for the workers that is safe, without risk to health and adequate as regards facilities and arrangements for their welfare at work.							
03: Safety & Hygienic Conditions	New – 04	Description of non-compliance: It was noted from review of records & management interaction that the frequency of examination of pressure vessel is not adequate as required by law. Facility has conducted pressure vessel test of air compressor last on 08.10.2021 & previously was tested on 08.10.2020 i.e., once in period of 12 months (externally).	<input type="checkbox"/> Training <input checked="" type="checkbox"/> Systems <input type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	Recommendations: It is recommended to the facility to maintain the frequency of examination of pressure vessel equipment's as per the legal requirement.	30 days	Desktop	Yes, Mr. Silvester D'Costa - Plant Manager		<p>Closed on 15th June 2022 by Desktop Review</p> <p>Closed on SEDEX on 15th June 2022</p>

		<p>Law / ETI Requirements: In accordance with The Maharashtra Factories Rules 1963, rule 65. Safety measure for pressure plant and vessel operated under pressure over atmospheric pressure (4) Ever pressure plant in service shall be thoroughly examined by a competent person- (a) Externally once in every period of six month (b) Internally once in every period of twelve month and (c) Hydraulic test once in period of four years.</p>							
09: No Harsh or Inhumane Treatment	New – 01	<p>Description of non-compliance: It was noted during review of records & management interaction that facility has constituted grievance redressal committee wherein monthly meetings are conducted between workers. However, there are no representatives appointed from employer side.</p> <p>Law / ETI Requirements: In accordance with The Industrial Dispute (Amendment) Act, 2010, Chapter IIB, 9C. Setting up of Grievance Redressal Machinery. - (1) Every industrial establishment employing twenty or more workmen shall have one or more Grievance Redressal Committee for the resolution of disputes arising out of individual grievances. (2) The Grievance Redressal Committee shall consist of equal number of members from the employer and the workmen. (3) The chairperson of the Grievance Redressal Committee shall be selected from the employer and from among the workmen alternatively on rotation basis</p>	<input type="checkbox"/> Training Systems <input checked="" type="checkbox"/> Costs <input type="checkbox"/> lack of workers <input type="checkbox"/> Other – please give details:	<p>Recommendations: It is recommended to the facility to constitute grievance redressal committee as required by the law.</p>	30 days	Desktop	Yes, Mr. Silvester D'Costa - Plant Manager		<p>Closed on 15th June 2022 by Desktop Review</p> <p>Closed on SEDEX on 15th June 2022</p>

		every year. (4) The total number of members of the Grievance Redressal Committee shall not exceed more than six.							
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Corrective Action Plan – Observations

Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
N/A	N/A	None observed	N/A	N/A

Good examples

Good example Number <i>The reference number of the good example from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
N/A	None observed	N/A

Confirmation

<p>Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) <i>If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.</i></p>		
A: Site Representative Signature:	Mr. Silvester D'Costa	Title: Plant Manager Date: 04 th May 2022
B: Auditor Signature:	Pralhad Magdum	Title: Lead Auditor Date: 04 th May 2022
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: I dispute the following numbered non-compliances:		
E: Signed: <i>(If <u>any</u> entry in box D, please complete a signature on this line)</i>		Title Date
F: Any other site Comments:		

Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a "root cause"

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=riPsbEoPQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>