SA Social Accountability International

SA8000 AUDIT SUMMARY REPORT

GUJARAT FLUOROCHEMICALS LIMITED 10/20/2023

Part I: Audit Information

AUDIT OVERVIEW	
Organization	Gujarat Fluorochemicals Limited
CertificationBody	Bureau Veritas Headquarters
Subcontracted Audit?	No
Audit Team Leader	Vivek Garg
APSCA #	ASCA21703373
Technical Reviewer	Krishan Gupta
Technical Experts	NA
Specialist Auditors	NA
Auditors	Manisha Baurai, Simon Allace
Observers	NA
Management Representatives	Mr. Subodh Gautam
Worker Representatives	Mr. Vikash Nizama, Mr. Shailendra
Audit Start Date	07/18/2023
Audit End Date	07/21/2023
Duration off site	1.00
Duration on site	12.00
Audit Type	Stage 2
Surveillance Audit	
Type Announced	Announced
Multisite	No

Surveillance Schedule	Annual
Audit Objectives	 To confirm that the management system conforms with all the requirements of SA 8000 and SAAS Advisory 18 requirements; To confirm that the organization has effectively implemented its planned arrangements; To confirm that the management system is capable of achieving the organization's policies and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements; If applicable to identify areas for potential improvement of the management system.
Audit Scope	 Dahej Plant: Manufacturing And Supply Of Caustic Soda, Chlorine Hydrogen, Chliromethanes, Anhydrous Hydrogen Fluoride, TFE, VDF, R22, R125, Fkm (Flouroelastomer), Different Grades Of Ptfe, Pfa, Fep, Micro powders, PPA (Polymer Processing Aids) And By-products Like: HCL, H2SO4, Dilute HF, Fluorosilicic Acid and Calcium Chloride.(By Primary Process Of Mixing, Heating, Filtration, Separation) Ranjit Nagar Plant: Manufacture & Supply Of Fluorocarbons, Its By- products and Testing Of Cylinders (Captive Purpose). Development, Manufacturing And Supply Of Fluorospeciality Chemicals. (By Primary Process Of Mixing, Heating, Filtration, Separation)

Audited Site(s)

Site No 1	
Site Name	GUJARAT FLUROCHEMICALS LIMITED (Dahej Plant (Central Location)
Address Line 1	12/A, INDUSTRIAL ESTATE, DAHEJ, TALUKA-VAGRA, DIST: BHARUCH - 392130, GUJARAT, INDIA
Address Line 2	
Postal/Zip Code	392130
City	vagra
State/Province	GUJARAT
Country	India
Longitude	0.000000
Latitude	0.000000
Site No 2	
Site Name	GUJARAT FLUROCHEMICALS LIMITED(Ranjit Nagar Plant)
Address Line 1	SURVEY NO-16/3, 26-27, RANJITNAGAR, TALUKA - GHOGHMBA, DIST.PANCHMAHAL - 389380, GUJARAT, INDIA
Address Line 2	
Postal/Zip Code	389380
City	GHOGMBA
State/Province	GUJARAT
Country	India
Longitude	0.000000
Latitude	0.000000

AUDIT DETAILS

Audited Locations	Canteen, Crèche, Fire/Evacuation Drill Witnesse, Main Production Facility, Warehouse and Distribution	
Additional Locations	NA	
Areas Not Audited this Audit	NA	
Worker Records Reviewed	55	
Shifts Audited	Evening/Night Shift, Morning/Day Shift	
Worker Interviews Conducted	50	
Worker Interviews		
Number of Workers Interviewed	50	
Number of Female Workers Interviewed	20	
Number of Male Workers Interviewed	30	
Number of Migrant Workers Interviewed	0	
Number of Group Interviews Conducted	6	
Offsite Interviews	No	

AUDIT CONCLUSIONS

Audit Comments	Gujarat Fluorochemicals Limited (GFL) is an Indian Chemicals Company with over 30 years of expertise in Fluorine Chemistry. GFL has expertise in Fluoropolymers, Fluorospecialities, Refrigerants and Chemicals, catering to the material requirements of modern world. They have competencies in Fluorine-based products through product innovation and customer partnerships in diverse end-use markets. The year 1989 marked commencement of Company's commercial operations with India's largest Refrigerant manufacturing unit at Ranjitnagar, Gujarat, India. The site was further expanded to produce Fluorospeciality products catering to the growing demands in global agriculture and pharmaceutical industry. Foraying into new avenues in 2007, with one of the world's most integrated facilities at Dahej, Gujarat, India, GFL now has a diverse portfolio of Fluoropolymers comprising PTFE, PFA, FEP, FKM, PVDF and Fluoropolymer Additives. Total area for the Dehej Plant is apprx. 130 Acres, and for Ranjit Nagar plant is apprx. 100Acres. With three manufacturing facilities in India, a captive Fluorspar mine in Morrocco, offices and warehouses in Europe and USA, and a marketing network spread across the world, GFL is one of the established players in Fluoropolymers and Fluorospecialities markets. Companies Sustainability goals are interworen with the way we do business all along our value chain. The company is signatory to the United Nations Global Compact (UNGC), and is a member of the Indian Chemical Council (ICC). Our focus on Health, Safety and Environment is reflected in the wellbeing and safety of our people. All-inclusive efforts towards sustainability at various facets make us long-term partners for our customers across geographies. Organisation run in three shift and at present total man power is approx 4790 in Dahej (3218Nos) and in Ranjeetnagar (1572Nos). The shift are at present in both locations three shift and one general. For Dahej Plant- First shift-06:00 am. General shift -09 am to 5.00pm For both the plant. Address verifie
Audit Recommendations	reported. There is no outsource or exclusive suppliers.
	Certification be granted

ORGANIZATIONAL DATA

Industry

Resource Transformation: (H2) Chemicals

Description of Operations	MIXING, HEATING, FILTRATION, SEPERATION		
Multi-Site?	No		
Company Provided Accommodation?	No		
Number of Shifts for Main Manufacturing/Service Processes	3		
Additional Shift Details	NO OF SHIFTS 4 GENERAL SHIFT TIME 09:00 to 5:30pm for HO and Site 1 FIRST SHIFT TIME 07:00am to 03:00 pm for HO and Site 1 SECOND SHIFT TIME 03:00am to 11:00 pm for HO and Site 1 THIRD SHIFT TIME 11:00pm to 07:00 am for HO and Site 1		
Date of Last Completed Self- Assessment	06/26/2023		
Minimum Wage	12,376.00 Regular Overhours 48.00		
Lowest Wage	12,376.00 Average Overhours 10.00		
Living Wage	9,060.00 Minimum Legal Worker Age 15.00		
Currency	Indian Rupee Age of Youngest Worker 19.00 (INR)		
	Number of employees		
Contract	Male (Employee Female (Employe (s)) (s))	ee Total (Employee(s))	
Direct employees	2523	42 2565	
Sub-contracted employees	3060	20 3080	
Permanent	0	0 0	
Temporary	0	0 0	
Homeworkers	0	0 0	
Migrants	0	0 0	

Part II: Performance Elements

Criteria 1. CHILD LABOR

SA8000 STANDARD REQUIREMENT CRITERIA:

1.1 The organization shall not engage in or support the use of child labor as defined in the SA8000 Standard.

1.2 The organization shall establish, document, maintain and effectively communicate to personnel and other interested parties, written policies and procedures for remediation of child laborers, and shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child as in the SA8000 Standard.

1.3 The organization may employ young workers, but where such young workers are subject to compulsory education laws, they shall work only outside of school hours. Under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work more than 8 hours a day. Young workers may not work during night hours.

1.4 The organization shall not expose children or young workers to any situations — in or outside of the workplace — that are hazardous or unsafe to their physical and mental health and development.

No Issues Raised	
Performance Element - Additional Comments	Display of child workers not allowed at main entrance gate evident, during the interview also security guards confi rmed that there is no child or Young workers, verifi ed the total of 50 nos. of samples verifi ed, no child labor or young workers observed.
Management Systems - Additional Comments	Risk related to Child labour is identified and actions are in place

Criteria 2. FORCED LABOR

SA8000 STANDARD REQUIREMENT CRITERIA:

2.1 The organisation shall not engage in or support the use of forced or compulsory labour, including prison labour, as defined in Convention 29, shall not retain original identification papers and shall not require personnel to pay 'deposits' to the organisation upon commencing employment.

2.2 Neither the organisation nor any entity supplying labour to the organisation shall withhold any part of any personnel's salary, benefits, property or documents in order to force such personnel to continue working for the organisation.

2.3 The organisation shall ensure that no employment fees or costs are borne in whole or in part by workers:

2.4 Personnel shall have the right to leave the workplace premises after completing the standard workday and be free to terminate their employment provided that they give reasonable notice to their organisation.

2.5 Neither the organisation nor any entity supplying labour to the organisation shall engage in or support human trafficking.

Issues Raised

Procedure on forced and compulsory labour-Dtd:01-04-

Comments	2023 is available The organization has defi ned the policy of non-practice of any sort of forced labour.
Management Systems - Additional Comments	Risk related to the Forced labour identified and actions are in place
Non-Conformities Raised	
Primary Clause N°	2.2
Secondary Clause N°	
NC Туре	Major
NC Statement	The process to manage the security contract was not found effective.
Objective Evidence observed	During the discussion with the 4 nos of security guards its evident that security agency new gen security are deducting the amount of INR1500 for the Uniform and Shoes

Criteria 3. HEALTH AND SAFETY

3.1 The organisation shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential health and safety incidents and occupational injury or illness arising out of, associated with or occurring in the course of work. It shall minimise or eliminate, so far as is reasonably practicable, the causes of all hazards in the workplace environment, based upon the prevailing safety and health knowledge of the industry sector and of any specific hazards.

3.2 The organisation shall assess all the workplace risks to new, expectant and nursing mothers including those arising out of their work activity, to ensure that all reasonable steps are taken to remove or reduce any risks to their health and safety.

3.3 Where hazards remain after effective minimisation or elimination of the causes of all hazards in the workplace environment, the organisation shall provide personnel with appropriate personal protective equipment as needed at its own expense. In the event of a work-related injury the organisation shall provide first aid and assist the worker in obtaining follow-up medical treatment.

3.4 The organisation shall appoint a senior management representative to be responsible for ensuring a safe and healthy workplace environment for all personnel and for implementing this Standard's Health and Safety requirements.

3.5 A Health and Safety Committee, comprised of a well-balanced group of management representatives and workers, shall be established and maintained. Unless otherwise specified by law, at least one worker member(s) on the Committee shall be by recognised trade union (s) representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers shall appoint a representative(s) as they deem appropriate. Its decisions shall be effectively communicated to all personnel. The Committee shall be trained and retrained periodically in order to be competently committed to continually improving the health and safety conditions in the workplace. It shall conduct formal, periodic occupational health and safety risk assessments to identify and then address current and potential health and safety hazards. Records of these assessments and corrective and preventive actions taken shall be kept.

3.6 The organisation shall provide to personnel, on a regular basis, effective health and safety training, including on-site training and, where needed, job-specific training. Such training shall also be repeated for new and reassigned personnel, where incidents have occurred, and when changes in technology and/or the introduction of new machinery present new risks to the health and safety of personnel.

3.7 The organisation shall establish documented procedures to detect, prevent, minimise, eliminate or otherwise respond to potential risks to the health and safety of personnel. The organisation shall maintain written records of all health and safety incidents that occur in the workplace and in all residences and property provided by the organisation, whether it owns, leases or contracts the residences or property from a service provider.

3.8 The organisation shall provide, for use by all personnel, free access to: clean toilet facilities, potable water, suitable spaces for meal breaks, and, where applicable, sanitary facilities for food storage.

3.9 The organisation shall ensure that any dormitory facilities provided for personnel are clean, safe and meet their basic needs, whether it owns, leases or contracts the dormitories from a service provider.

3.10 All personnel shall have the right to remove themselves from imminent serious danger without seeking permission from the organisation.

Issues Raised	
Performance Element - Additional Comments	Dahej Plant: Transport Safety Manual Training dated 18/07/2023 participant 10 Chemical Awareness Training dated 30/06/2023 participants 25nos Mediclaim awareness Training dated 29/06/2023 11 Nos. ERT dated 24/06/2023 19 nos

	ERGONOMICS Workstations maintained in line with the results of the health and safety risk assessment to minimize bodily strain. Work place conditions well maintained. Tables and ergonomic Chairs are provided for all employees to carry out their work without any strain. Work place conditions are found conducive for the employees to work. Interview with workers and Health and Safety team confirmed the same. PERSONAL PROTECTIVE EQUIPMENT (PPE) The Organisation has conducted Risk Assessment for various activities being carried out and they were provided appropriate PPE's as identified. Safety helmet, Safety Goggle, Safety Shoes, Face Sheild, Face mask, Chemical wise specific hand glove and suit, cryogenic hand glove are given at free of cost and employees also found wearing the same. GENERAL WORKING ENVIRONMENT The Overall work environment is found good. Workplaces found clean, tidy and free from dust and dirt. There was no process where there is a chance for potential for ignition. Work place conditions are monitored for Air, Noise and Lighting. External agency support is taken to assess Air, Noise, Lighting and Dust level and the results are within limits. WATER, AIR, NOISE AND TEMPERATURE A Survey has been conducted by engaging external agency M/s. Enpro Enviro Tech and Engineers Pvt limited for Industrial noise level, Illumination level, Source emissionetc. on dated 05/07/2023. Report dated 08/07/2023 and found the results are within limits. Drinking Water Test Report done by Drinking Water test report no. Report No. URC-23-06-L-0947, dated 04/07/2023 thru Uni Star Laboratory confirms water is potable. MACHINE GUARDS AND SAFETY Diesel Generator with acoustic enclosure is found used by the Organisation in the absence of electrical power supply. All sewing machines provided with pulley and belt guards. The same werified during plant visit. REST ROOM FACLLTIES Restroom are separate for Male and female. Toilets for Men – 27, Female – 7. KITCHEN, CAFETERIA AND CANTEENS Kitchen Cafeteria with dining facility prov
	onformities Raised
Primary Clause N°	3.1
Secondary Clause N°	
NC Туре	Major

NC Statement	The process to manage the safe enviroment was not found effective.
Objective Evidence observed	 During the site round at dahej plant following observed: 1) Chemical storage at the backside of logistic were did not having secondary containment 2) Fire extinguisher SR-02/FE/04 found totally block for the access 3) Switch yard earthing pit due date was showing the APR-23 4) Assembly point no12 was not clear and fit for purpose, totally wet mud and scrap stored into this observed. 5) Nitrogen storage yard were found open and no responsible contact or restriction to enter observed.

Criteria 4. FREEDOM OF ASSOCIATION & RIGHT TO COLLECTIVE BARGAINING

SA8000 STANDARD REQUIREMENT CRITERIA:

4.1 All personnel shall have the right to form, join and organise trade union(s) of their choice and to bargain collectively on their behalf with the organisation. The organisation shall respect this right and shall effectively inform personnel that they are free to join a worker organisation of their choosing without any negative consequences or retaliation from the organisation. The organisation shall not interfere in any way with the establishment, functioning or administration of workers' organisation(s) or collective bargaining. 4.2 In situations where the right to freedom of association and collective bargaining are restricted under law, the organisation shall allow workers to freely elect their own representatives.

4.3 The organisation shall ensure that union members, representatives of workers and any personnel engaged in organising workers are not subjected to discrimination, harassment, intimidation or retaliation for being union members, representative(s) of workers or engaged in organising workers, and that such representatives have access to their members in the workplace.

No Issues Raised	
Performance Element - Additional Risk related to FOA is in place and actions are in place Comments Risk related to FOA is in place and actions are in place	
Management Systems - Additional Comments	Following the Model standing order of Gujarat Govt.

Criteria 5. DISCRIMINATION

5.1 The organisation shall not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinions, age or any other condition that could give rise to discrimination.

5.2 The organisation shall not interfere with the exercise of personnel's rights to observe tenets or practices or to meet needs relating to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinions or any other condition that could give rise to discrimination.

5.3 The organisation shall not allow any behaviour that is threatening, abusive, exploitative or sexually coercive, including gestures, language and physical contact, in the workplace and in all residences and property provided by the organisation, whether it owns, leases or contracts the residences or property from a service provider.

5.4 The organisation shall not subject personnel to pregnancy or virginity tests under any circumstances.

No Issues Raised

Performance Element - Additional Comments	Shift Approval 09-03-2022 is available and during interview workers found aware of the same.
Management Systems - Additional Comments	Risk related to discrimination is in place and actions are in place

Criteria 6. DISCIPLINARY PRACTICES

SA8000 STANDARD REQUIREMENT CRITERIA:

6.1 The organisation shall treat all personnel with dignity and respect. The organisation shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

No Issues Raised

Performance Element - Additional Comments	Organisation is not engaging or supporting the use of corporal punishment, mental or physical coercion and verbal abuse. Organisation has a well-defi ned guidelines for ensuring transparent disciplinary action against errant employees in organisation. Any disciplinary action is based on the relevant clauses of the standing order
Management Systems - Additional Comments	Procedure for Disciplinary practice- GFL/06 is available and Implemented, Following the Model standing order

Criteria 7. WORKING HOURS

7.1 The organisation shall comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays. The normal work week, not including overtime, shall be defined by law but shall not exceed 48 hours.

7.2 Personnel shall be provided with at least one day off following every six consecutive days of working. Exceptions to this rule apply only where both of the following conditions exist: a) National law allows work time exceeding this limit; and

b) A freely negotiated collective bargaining agreement is in force that allows work time averaging, including adequate rest periods.

7.3 All overtime work shall be voluntary, except as provided in 7.4 below, shall not exceed 12 hours per week and shall not be requested on a regular basis.

7.4 In cases where overtime work is needed in order to meet short-term business demand and the organisation is party to a freely negotiated collective bargaining agreement representing a significant portion of its workforce, the organisation may require such overtime work in accordance with such agreement. Any such agreement must comply with the other requirements of this Working Hours element.

Issues Raised		
Conformity Record		
Question	Answer	Audit Trail evidence
Does overtime exceed 12 hours per week?	Yes (NOT OK)	Yes overtime exceed 12 hours per week In Dahej Plant and in ranjit nagar plant it was verified that OT was more then legal and SA 8000 requirement in all the contract organization like Anuj Enterprise , new gen security and Satyam Enterprise. The worker from Anuj Enterprise worked on Oct 2022 i.e 25 days 12 hr duty and 3.5 days 8 hr. Total overtime 100 hr that month of Oct 2022. It is violation of local legal requirement of 50 hr overtime in a quarter. Raised a major NC .
Performance Element - Additional Comments	for the Oct 2 50 worker fil Nagar Site w time of the w process on the	attendance details in out attendance details 022 to May 2023 . As per Procedure 200 total les in Dahej Plant and 37 files in Ranjeet vere checked. Attendance record the In & Out orkers. The in and out attendance logging he audit day were checked at worker entry working hours found to satisfactory except C area.
Management Systems - Additional Comments	Risk related going on	to the Overtime is in place and actions are
Non-C	Conformities R	laised
Primary Clause N°	7.3	
Secondary Clause N°		
NC Туре	Major	
NC Statement	Overtime cor worker	ntrol was not found adequate in the contract

	In HO it was verified that OT was more then legal and SA 8000 requirement in all the contract organization like Anuj Enterprise , new gen security and Satyam Enterprise. The worker from Anuj Enterprise worked on Oct 2022 i.e 25 days 12 hr duty and 3.5 days 8 hr. Total overtime 100 hr that month of Oct 2022. It is violation of local legal requirement of 50 hr overtime in a quarter.
Objective Evidence observed	Justification –As this is direct requirement of Standard and Gujarat factory rules hence raised as major NC. Although during interview it was observed that OT is voluntary basis and workers get the premium payment of overtime and give satisfactory remark about company and also there was not observed any immediate threats to workers lives and grievous and intentional violations of human rights hence raised as major NC not critical.

Criteria 8. REMUNERATION

SA8000 STANDARD REQUIREMENT CRITERIA:

8.1 The organisation shall respect the right of personnel to a living wage and ensure that wages for a normal work week, not including overtime, shall always meet at least legal or industry minimum standards, or collective bargaining agreements (where applicable). Wages shall be sufficient to meet the basic needs of personnel and to provide some discretionary income.

8.2 The organisation shall not make deductions from wages for disciplinary purposes. Exception to this rule applies only when both of the following conditions exist:

a) Deductions from wages for disciplinary purposes are permitted by national law; and b) A freely negotiated collective bargaining agreement is in force that permits this practice. 8.3 The organisation shall ensure that personnel's wages and benefits composition are detailed clearly and regularly to them in writing for each pay period. The organisation shall lawfully render all wages and benefits due in a manner convenient to workers, but in no circumstances in delayed or restricted forms, such as vouchers, coupons or promissory notes. 8.4 All overtime shall be reimbursed at a premium rate as defined by national law or established by a collective bargaining agreement. In countries where a premium rate for overtime is not regulated by law or there is no collective bargaining agreement, personnel shall be compensated for overtime at the organisation's premium rate or at a premium rate equal to prevailing industry standards, whichever is higher.

8.5 The organisation shall not use labour-only contracting arrangements, consecutive shortterm contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to personnel under applicable laws and regulations pertaining to labour and social security.

Performance Element - Additional	The Organization's policy is to pay the applicable legal
Comments	minimum wages
	to different categories of employees in the facility. The Organization
	practices only monthly salary and no wages are based on piece rate.
	The Government Notifi cation (Minimum salary notifi cation of Gujarat
	Government) for Home Textile Industry for the period from Apr' 22 to Oct'
	22 followed as above.
	Social deductions PF & Group Insurance have done for all . Wage slip is
	given to all employees along with wages. The
	Organisation practices only
	monthly salary and no wages are based on piece rate.

Issues Raised

Management Systems - Additional Comments	Salary is being paid on 5th of every month and it is paid through bank. Salary is calculated based on attendance of employees presented in a month which is monitored through Biometric System. System is in place to monitor overtime work .verifi ed with worker interview and document review.(wage record & Time card) 87 sample includes Onroll (50Nos.)& Contract(37Nos). Contract workers only utilizing in Production dept. PAYROLL DOCUMENTATION Payment of wages calculation was used Pay soft software system. All workers are included in payroll. All workers are included in payroll and social security records. Payroll documents such as In & Out time record, Wage register, Pay slip are available which found complete and accurate and up-to date. 50 records verifi ed for Dahej Plant and 37 Records for Ranjit nagar Plan thereby exceeding the requirement of P200:2020 Verifi ed with attendance register, Pay slip, and salary register. Verifi ed with attendance register, Pay slip, and salary register. Verifi ed moth found necessary records are maintained by the Organization. Final settlement of wages includes wage of bonus, leave and Gratuity. Records to this effect verifi ed for during audit. Final settlement is made timely and correctly. Leave Wages: - Earn Leave calculated during JAN' 23 to JUNE' 2023. Earn days wages are found paid for last year.
	onformities Raised
Primary Clause N°	8.1
Secondary Clause N°	
NC Туре	Major
NC Statement	The payment of national holiday not given as per requirement.
Objective Evidence observed	The man power supplier Anuj Enter prise : the contract workers not getting premium payment for worked on national holiday. Justification – As this is direct requirement of Standard and local rules hence raised as major NC.As the overtime and salary reimbursement is on time hence raised major NC not critical.

Part III: Management Systems Elements

Overall MD score: 3.58

If the MD score is 0, no MD was performed on this audit

Criteria 9.1 POLICIES, PROCEDURES & RECORDS

SA8000 STANDARD REQUIREMENT CRITERIA:

9.1.1 Senior management shall write a policy statement to inform personnel, in all appropriate languages, that it has chosen to comply with SA8000.

9.1.2 This policy statement shall include the organisation's commitment to conform to all requirements of the SA8000 Standard and to respect the international instruments as listed in the previous section on Normative Elements and Their Interpretation. The statement shall also commit the organisation to comply with: national laws, other applicable laws and other requirements to which the organisation subscribes.

9.1.3 This policy statement and the SA8000 Standard shall be prominently and conspicuously displayed, in appropriate and comprehensible form, in the workplace and in residences and property provided by the organisation, whether it owns, leases or contracts the residences or property from a service provider.

9.1.4 The organisation shall develop policies and procedures to implement the SA8000 Standard.

9.1.5 These policies and procedures shall be effectively communicated and made accessible to personnel in all appropriate languages. These communications shall also be clearly shared with customers, suppliers, sub-contractors and sub-suppliers.

9.1.6 The organisation shall maintain appropriate records to demonstrate conformance to and implementation of the SA8000 standard, including the Management System

requirements contained in this element. Associated records shall be kept and written or oral summaries given to the SA8000 worker representative(s).

9.1.7 The organisation shall regularly conduct a management review of its policy statement, policies, procedures implementing this Standard and performance results, in order to continually improve.

9.1.8 The organisation shall make its policy statement publicly available in an effective form and manner to interested parties, upon request.

MS Maturity Declaration Score: 3.67

No Issues Raised

Criteria 9.2. SOCIAL PERFORMANCE TEAM

SA8000 STANDARD REQUIREMENT CRITERIA:

9.2.1 A Social Performance Team (SPT) shall be established to implement all elements of SA8000. The Team shall include a balanced representation of:

a) SA8000 worker representative(s); and

b) management.

Compliance accountability for the Standard shall solely rest with Senior Management. 9.2.2 In unionised facilities, worker representation on the SPT shall be by recognised trade union(s) representative(s), if they choose to serve. In cases where the union(s) does not appoint a representative or the organisation is not unionised, workers may freely elect one or more SA8000 worker representative(s) from among themselves for this purpose. In no circumstances shall the SA8000 worker representative(s) be seen as a substitute for trade union representation.

MS Maturity Declaration Score: 3.67

Issues Raised

Non-Conformities

SA Clause N°	9.2.2
NC Туре	Major
NC Statement	he process to implement the SPT election was not found effective in Ranjit Nagar plant.
Objective Evidence observed	Into the Ranjit nagar plant During the Verification of SPT team names there is no evidence observed for the election also the During interview of SPT members they accepted that they are selected by the management directly.

Criteria 9.3. IDENTIFICATION & ASSESSMENT OF RISKS

SA8000 STANDARD REQUIREMENT CRITERIA:

9.3.1 The SPT shall conduct periodic written risk assessments to identify and prioritise the areas of actual or potential non-conformance to this Standard. It shall also recommend actions to Senior Management that address these risks. Actions to address these risks shall be prioritised according to their severity or where a delay in responding would make it impossible to address.

9.3.2 The SPT shall conduct these assessments based on their recommended data and data collection techniques and in meaningful consultation with interested parties.

MS Maturity Declaration Score: 3.26

No Issues Raised

Criteria 9.4. MONITORING

SA8000 STANDARD REQUIREMENT CRITERIA:

9.4.1 The SPT shall effectively monitor workplace activities for:

a) compliance with this Standard;

b) implementation of actions to effectively address the risks identified by the SPT; and

c) for the effectiveness of systems implemented to meet the organisation's policies and the requirements of this Standard.

It shall have the authority to collect information from or include interested parties (stakeholders) in its monitoring activities. It shall also liaise with other departments to study, define, analyse and/or address any possible non-conformance(s) to the SA8000 Standard. 9.4.2 The SPT shall also facilitate routine internal audits and produce reports for senior management on the performance and benefits of actions taken to meet the SA8000 Standard, including a record of corrective and preventive actions identified. 9.4.3 The SPT shall also hold periodic meetings to review progress and identify potential

actions to strengthen implementation of the Standard.

MS Maturity Declaration Score: 3.35

Issues Raised	
Non-Conformities	
SA Clause N° 9.4.2	
NC Туре	Major
NC Statement	The process to implement the NC closure was not found effective.
Objective Evidence observed	During the Verification of the NC reports raised into the internal audit it is evident that NCs are closed directly without taking the Root cause and corrective actions
Performance Criteria Flagged	

Performance Criteria Flagged

'Topic' refers to the standard requirement, and 'criteria' is the specific risk which this management systems process is inadequate to fully address.

Торіс	Criteria

Forced Labor	Worker payments to recruitment agents
Working Hours	Overtime hours (voluntary, limited and not regularly requested)
Remuneration	Meeting legal, CBA and/or other requirements
Health and Safety	Hazardous equipment and/or work environment and/or utilities (machinery, air quality, electrical, lighting, injury hazards etc.)

Criteria 9.5. INTERNAL INVOLVMENT & COMMUNICATION

SA8000 STANDARD REQUIREMENT CRITERIA:

9.5.1 The organisation shall demonstrate that personnel effectively understand the requirements of SA8000, and shall regularly communicate the requirements of SA8000 through routine communications.

MS Maturity Declaration Score: 4.07

No Issues Raised

Criteria 9.6. COMPLAINT MANAGEMENT AND RESOLUTION

SA8000 STANDARD REQUIREMENT CRITERIA:

9.6.1 The organisation shall establish a written grievance procedure that is confidential, unbiased, non-retaliatory and accessible and available to personnel and interested parties to make comments, recommendations, reports or complaints concerning the workplace and/or nonconformances to the SA8000 Standard.

9.6.2 The organisation shall have procedures for investigating, following up on and communicating the outcome of complaints concerning the workplace and/or nonconformances to this Standard or of its implementing policies and procedures. These results shall be freely available to all personnel and, upon request, to interested parties. 9.6.3 The organisation shall not discipline, dismiss or otherwise discriminate against any personnel or interested party for providing information on SA8000 compliance or for making other workplace complaints.

MS Maturity Declaration Score: 3.71

No Issues Raised

Criteria 9.7. EXTERNAL VERIFICATION & STAKEHOLDER ENGAGEMENT

SA8000 STANDARD REQUIREMENT CRITERIA:

9.7.1 In the case of announced and unannounced audits for the purpose of certifying its compliance with the requirements of this Standard, the organisation shall fully cooperate with external auditors to determine the severity and frequency of any problems that arise in meeting the SA8000 Standard.

9.7.2 The organisation shall participate in stakeholder engagement in order to attain sustainable compliance with the SA8000 Standard.

MS Maturity Declaration Score: 3.39

No Issues Raised

Criteria 9.8. CORRECTIVE & PREVENTIVE ACTIONS

9.8.1 The organisation shall formulate policies and procedures for the prompt implementation of corrective and preventive actions and shall provide adequate resources for them. The SPT shall ensure that these actions are effectively implemented.

9.8.2 The SPT shall maintain records, including timelines, that list, at minimum, non-conformances related to SA8000, their root causes, the corrective and preventive actions taken and implementation results.

MS Maturity Declaration Score: 3.80

No Issues Raised

Criteria 9.9. TRAINING & CAPACITY BUILDING

SA8000 STANDARD REQUIREMENT CRITERIA:

9.9.1 The organisation shall implement a training plan for all personnel to effectively implement the SA8000 Standard as informed by the results of risk assessments. The organisation shall periodically measure the effectiveness of training and record their nature and frequency

MS Maturity Declaration Score: 3.50

No Issues Raised

Criteria 9.10. MANAGEMENT OF SUPPLIERS AND CONTRACTORS

SA8000 STANDARD REQUIREMENT CRITERIA:

9.10.1 The organisation shall conduct due diligence on its suppliers/subcontractors, private employment agencies and sub-suppliers' compliance with the SA8000 Standard. The same due diligence approach shall be applied when selecting new suppliers/subcontractors, private employment agencies and sub-suppliers. The minimum activities for the organisation to fulfil this requirement shall be recorded and shall include:

a) effectively communicating the requirements of this Standard to senior leadership of suppliers/subcontractors, private employment agencies and sub-suppliers;

b) assessing significant risks of non-conformance by suppliers/subcontractors, private employment agencies and sub-suppliers. [Note: an explanation of "significant risk" is found in the guidance document];

c) making reasonable efforts to ensure that these significant risks are adequately addressed by suppliers/subcontractors, private employment agencies and sub-suppliers and by the organisation where and when appropriate, and prioritised according to the organisation's ability and resources to influence these entities; [Note: an explanation of "reasonable effort" is found in the guidance document]; and

d) establishing monitoring activities and tracking performance of suppliers/subcontractors, private employment agencies and sub-suppliers to ensure that these significant risks are effectively addressed.

9.10.2 Where the organisation receives, handles or promotes goods and/or services from suppliers/subcontractors or sub-suppliers who are classified as home workers, the organisation shall take effective actions to ensure that such home workers are afforded a level of protection substantially equivalent to that afforded to the organisation's other workers under the requirements of this Standard.

MS Maturity Declaration Score: 3.67

No Issues Raised

Part IV: Non-Conformity Record

From which audit	Primary Clause No	Secondary Clause No	NC Type	Due date	Closed or Open	Closure Date
Previous Audit	3.1	9.4.1	Minor	26-4-2022	Closed	15-3-2022
Previous Audit	9.9.1		Minor	26-4-2022	Unclosed	1-3-2024
Previous Audit	3.1	9.4	Major	14-6-2022	Unclosed	1-3-2024
Previous Audit	8.3	9.1	Minor	14-9-2022	Unclosed	1-3-2024
Previous Audit	9.9.1		Minor	14-9-2022	Unclosed	1-3-2024
Previous Audit	3.1	9.4	Major	13-9-2022	Unclosed	1-3-2024
Previous Audit	8.3	1.2	Minor	13-12-2022	Unclosed	1-3-2024
Previous Audit	9.9.1		Minor	13-12-2022	Unclosed	1-3-2024
Previous Audit	3.1	9.4	Minor	8-3-2023	Unclosed	1-3-2024
Current Audit	2.2		Major	18-10-2023	Closed	5-9-2023
Current Audit	3.1		Major	18-10-2023	Closed	6-9-2023
Current Audit	7.3		Major	18-10-2023	Closed	5-9-2023
Current Audit	8.1		Major	18-10-2023	Closed	6-9-2023
Current Audit	9.2.2		Major	18-10-2023	Closed	5-9-2023
Current Audit	9.4.2		Major	18-10-2023	Closed	5-9-2023

Part V: Record Annex

Additional Documents					
Tab	Section	Question	Filename		
Audit Overview	Audit Overview	Supporting Document Upload	Audit Pack-Surveillance Audit Plan.docx		
Audit Overview	Audit Overview	Upload Stage 1 Audit Report	Stage 1 Audit Report.pdf		
Audit Overview	Audit Overview	Upload Stage 1 Audit Findings Review/Closure & Correspondence	Finding closure stage-1- GUJARAT FLUROCHEMICALS LIMITED 1922329 Stage 1 audit -Corrective action.msg		
Audit Overview	Audit Plan	Upload 'As Intended' Audit Plan	Audit pack-Audit_Plan.doc		
Audit Overview	Audit Plan	Upload 'As Audited' Audit Plan	Hand Marked Audit_Plan.pdf		
CONFIDENTIAL INFORMATION	CONFIDENTIAL INFORMA	Document Upload	Audit plan communication.msg		