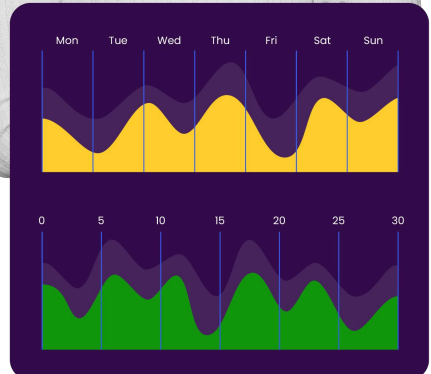


SMETA Corrective Action Plan Report (CAPR)

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
 - 0. Enabling accurate assessment
 - 1. Employment is freely chosen
 - 1.A. Responsible recruitment and entitlement to work
 - 2. Freedom of association and right to collective bargaining are respected
 - 4. Child labour shall not be used
 - 5. Legal wages are paid
 - 5.A. Living wages are paid
 - 6. Working hours are not excessive
 - 7. No discrimination is practiced
 - 8. Regular employment is provided
 - 8.A. Sub-contracting and homeworkers are used responsibly
 - 9. No harsh or inhumane treatment is allowed
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS407012744	Site name	Orangeblue Inspired Pvt Ltd
Business name	ORANGE BLUE Inspired Pvt Ltd	Site address	201301 G 107 SECTOR 63, NOIDA, IN

Audit details

Sedex company reference	ZC406862593	Auditor company name	URS Certification Limited
Date of audit	2025-06-28	Audit conducted by	Devdatt Parashar

Audit pillars	Labour Standards Health and safety		
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Time in and out	Day 1		
	In	09:35	
	Out	17:46	


Audit type	Periodic
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Was the audit announced?	Announced
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Was the Sedex SAQ available for review?	No
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Who signed and agreed CAPR?	Mr. Vineet Kumar / HR Manager
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Any conflicting information SAQ/Pre-Audit Info	No
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Is further information available?	No	
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Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No

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B: Present at the audit?	Yes	Yes	No
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C: Present at the closing meeting?	Yes	Yes	No
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Reason for absence at the opening meeting	no union in the factory
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Reason for absence during the audit	no union in the factory
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Reason for absence at the closing meeting	no union in the factory
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SMETA declaration

Auditor team



SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

Lead auditor	Devdatt Parashar		APSCA Number	21705217
Additional auditor	Jyoti Malhotra		APSCA Number	21705270
Date of declaration	2025-06-28			

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Vineet Kumar
Title	HR Manager
Date of declaration	2025-06-28

ORANGEBLUE INSPIRED PVT. LTD.

Authorized Signatory

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.G Provide sufficient first-aid supplies ons...	Local law Base code	NC ZAF600988780
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF600988778
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF-
	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC ZAF-
	3.O Implement an appropriate electrical safet...	Local law Base code	NC ZAF600988779

Findings: non-compliances

ZAF600988780

Non-compliance

Due 2024-10-06

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-06-28)*

Workplace requirement

3.G Provide sufficient first-aid supplies onsite, and ensure that adequately trained personnel are available during all shifts.

Time given to resolve

30 days

Issue title

289 - First aid box available but contents are missing, out of date or otherwise inadequate

Verification method

Desktop audit

Description

During the factory tour that factory has not displayed first aid contents list near the first aid box.

Area of non-compliance/non-conformance

Local law
Base code

Description (carried over)

During the factory tour that factory has not displayed first aid contents list near the first aid box.

Corrective and preventative actions

Factory shall ensure to provide first aid contents near first aid box

Corrective and preventative actions (carried over)

Factory shall ensure to provide first aid contents near first aid box

Local law reference

According to Section 45(1) of The Factories Act, 1948, There shall in every factory be provided and maintained so as to be readily accessible during all working hours first-aid boxes or cupboards equipped with the prescribed contents, and the number of such boxes or cupboards to be provided and maintained shall not be less than one for every one hundred and fifty workers ordinarily employed (at any one time) in the factory

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

N/A

Evidence

[NC Photo First aid contents not displayed.jpg](#)

* PDF generated at 13:57 (UTC) on 28 Jun 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600988778

Non-compliance

Due 2024-10-06

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Findings](#)

[Management systems →](#)

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Time given to resolve

30 days

Issue title

214 - No evacuation plan or designated emergency exit route

Verification method

Desktop audit

Description

During the factory tour it was noted that fire evacuation plan not provided.

Area of non-compliance/non-conformance

Local law
Base code

Description (carried over)

During the factory tour it was noted that fire evacuation plan not provided.

Corrective and preventative actions

Factory shall ensure to provide the fire evacuation in all the working area

Corrective and preventative actions (carried over)

Factory shall ensure to provide the fire evacuation in all the working area

Local law reference

According to Section 38 (1 & 2) of the Factories Act, 1948, Every factory shall provide and maintain 1) a) safe means of escape for all person in the event of fire and b) the necessary equipment and facilities for extinguishing fire 2) effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.

* PDF generated at 13:57 (UTC) on 28 Jun 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

190 - No fire fighting equipment signage/labelling/instructions

Description

It was noted during factory tour that visual operating instructions were not posted near fire equipment installed at security guard

Corrective and preventative actions

It is recommended to the factory to provide visual operating instructions in local language to the fire fighting equipment.

Local law reference

In accordance with the Factories Act 1948, Section 38(1) In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and provide and maintain (a) safe means of escape for all persons in the event of a fire and (b) the necessary equipment and facilities for extinguishing fire. (2) Effective measures shall be taken to ensure that in every factory all the workers are familiar with the means of escape in case of fire and have been adequately trained in the routine to be followed in such cases.

Evidence

[NC Photo - Operating instruction missing.jpg](#)

* PDF generated at 13:57 (UTC) on 28 Jun 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

Verification method

Desktop audit

Description

"During the factory tour it was noted that needle guard was not installed in approx 5% of the stitching machines

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

Factory is recommended to install needle guards all stitching machine

Local law reference

In accordance with the Factories Act 1948, Section 26 (1) All machinery driven by power and installed in any factory (a) every set screw, bolt, or key on any revolving shaft, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger. According to Section 21 of The Factories Act, 1948, Every moving part of a prime mover and every flywheel connected to a prime mover, whether the prime mover or fly wheel is in the engine house or not shall be securely fenced by safeguards of substantial construction which shall be constantly maintained and kept in position while the part of machinery they are fencing are in motion or in use

* PDF generated at 13:57 (UTC) on 28 Jun 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600988779

Non-compliance

Due 2024-10-06

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Time given to resolve

30 days

Issue title

228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels

Verification method

Desktop audit

Description

During the factory tour that factory has not provided rubber mat in electrical Panel

Area of non-compliance/non-conformance

Local law
Base code

Description (carried over)

During the factory tour that factory has not provided rubber mat in electrical Panel

Corrective and preventative actions

Factory shall ensure to provide rubber mat in all electrical panel

Corrective and preventative actions (carried over)

Factory shall ensure to provide rubber mat in all electrical panel

Local law reference

In accordance with Factories Act 1948, Section 7A (1) every occupier shall ensure, so far as is reasonably practicable, the health, safety and welfare of all workers while they are at work in the factory. (2) Without prejudice to the generality of the provisions of sub-section (1), the matters to which such duty extends, shall include- (a) the provision and maintenance of plant and systems of work in the factory that are safe and without risks to health, (b) the arrangements in the factory for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances, (c) the provision of such information, instruction, training and supervision as are necessary to ensure the health and safety of all workers at work

Evidence

[NC Photo Rubber mat missing.jpg](#)

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Authorized Signatory

[← Findings](#)

[Management systems →](#)

* PDF generated at 13:57 (UTC) on 28 Jun 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Findings](#)

[Management systems →](#)

Audit company:
URS Certification Limited

Audit reference:
ZAA600142555

Start Date:
2025-06-28

End Date:
2025-06-28

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				

Not addressed













Fundamental improvements required


Some improvements recommended


Robust management systems

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	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly				
9. No harsh or inhumane treatment is allowed				
10.A. Environment 2-Pillar				

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

Guidance

The Corrective Action Plan Report (CAPR) 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/ non-conformances.

Good practice examples should be pointed out at the closing meeting as well as discussing non-compliances/ non-conformances (NCs) and corrective actions, Collaborative Action Required (CAR) findings and the Management Systems Assessment (MSA).

Next steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, NCs, CARs, MSA and good examples. If you have not already received instructions on how to do this then please visit the [Sedex members' e-learning platform](#).
2. Sites shall action its NCs and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request that the audit body verify its actions. Please visit [Sedex members' e-learning platform](#) for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a desktop review process via the Sedex platform or by follow-up audit.
5. Some NCs that cannot be closed off by desktop review may need to be closed off via a 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 NC. Any follow-up audit must take place within twelve months of the previous initial/periodic audit and the information from the previous 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).
7. The site shall develop and share with Sedex an action plan to work on CAR findings, and take actions to work on these areas as identified.
8. The site should use the MSA gradings to help to improve internal systems, focusing where their systems are weakest and the risks of harm are highest. These actions should better prepare them for future audits and help sustain compliance.

[← Management systems](#)

Management Systems Assessment (MSA)

A management system is defined as a comprehensive framework comprising of processes, policies, procedures, and tools that are strategically designed and implemented within a business to plan, organise, execute, monitor, and continuously improve its activities. Management systems are the systems that underpin how a company runs its day-to-day operations, makes decisions, and helps avoid the recurrence of common problems.

Where management systems are weak a site is at higher risk of non-compliance over time, the SMETA MSA can help sites to proactively reduce the likelihood of risks occurring. Sites should take actions commensurate with their size and resources, focusing on where their systems are weakest and the likelihood of risks is highest, based on their sector, location and workforce profile.

The MSA Grades do not result in NCs, and will not be re-assessed in follow-up audits.

For more information on management systems please refer to the Management Systems workbooks.

Collaborative Action Required

The SMETA Workplace Requirements identify certain specific issues where a site may not meet the base code, but the usual mechanisms of NC verification and closure are not appropriate, for some or all of the following reasons;

- The audited party does not have the capacity/ responsibility to close the issue without support from other relevant stakeholders, such as commercial partners/buyers.
- Remediation of the issue requires an indeterminate and possibly extended timeframe, rather than a predetermined deadline as set within the Sedex platform.
- There is a risk of adverse consequences if closure of a particular issue is not approached with due consideration and time provided for adequate risk assessment.
- Evidencing effective remediation is complex and it is outside the capacity of existing SMETA methodology to validate through evidence provided during an onsite assessment alone.

These specific WRs have a Collaborative Action Required (CAR) finding raised against them.

Collaborative Action Required findings require a different way of working from other NCs for buyer and supplier members. The activities required to close these issues may involve actions from both buyers and suppliers, as well as additional stakeholders such as third-party labour providers, impacted workers, local NGOs, and trade unions.

[← Guidance](#)

Due to the complexity of the issues and the spectrum of potential stakeholders that may need to act, CARs may need long-term closure plans, potentially spanning multiple years. To facilitate a longer-term approach and to reduce the likelihood of undue pressure on suppliers to close issues that may be out of their control, Sedex does not prescribe a closure date nor a verification methodology for these findings. Sedex encourages all its members to work collaboratively and responsibly on these issue areas, sharing responsibilities and actions as appropriate.

When developing a methodology to prioritise action on these more complex areas, Sedex recommends following a due diligence process and prioritising activities based on the most salient risks.

For Suppliers

Where CARs are raised suppliers should create an action plan for how they are going to address these areas. Sedex also recommends suppliers reach out to their buying partners to understand their expectations on these issues and start a constructive dialogue. The action plans can be uploaded on to the Sedex platform, which will change the status of the CAR finding from “open” to “in progress”. Management and assessment of action plans is encouraged as an activity between linked buyer and supplier members.

For Buyers

Where CARs are raised buyer members should prioritise resolution of these issues based on a salient risk approach. Buyers should assess their own roles and responsibilities in the closure of these findings, especially considering any increased financial costs and how these may relate to the buyers own purchasing practices. Buyers should work with suppliers to ensure that closure plans are realistic, taking a long-term approach to improvement where it is necessary, and working with multi-stakeholder initiatives, NGOs, Trade Unions and other third parties to address these issues, which may be widespread. In the interests of enabling transparency, collaboration and long-term effective remediation, the application of commercial penalty against suppliers where these issues are identified and action plans are in place is not encouraged.

For Auditors

Auditors will assess whether the CARs are met through the SMETA audit process and raise the findings where relevant. Auditors will not assess the action plans shared or provide guidance on closure methodology, due to the limitations of assessing scope and responsibilities through a supplier site assessment alone. CAR findings will be superseded and closed in periodic audits. The auditor will assess the Workplace Requirements anew and raise a CAR in following audits until there is no longer a finding to raise.



For more information visit <https://www.sedex.com>

[← Guidance](#)