

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	ZS1000035886	Site name	SPARKON TEXTILE VENTURES PVT LTD
Business name	SPARKON TEXTILE VENTURES PVT LTD	Site address	GAT NO.624 TO 625,EKHATPUR,TALUKA - SANGOLA,SOLAPUR,Sangole,Solapur,MAHARASHTRA,413307 SANGOLA IN 413307

Audit details

Sedex company reference	ZC5000030691	Auditor company name	DQS CFS GmbH
Audit company address	August-Schanz-Str. 21, Frankfurt/M, DE, 60433		
Date of audit	2025-12-06	Audit conducted by	Kishore Sharfudeen
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		
Time in and out	Day 1		
	In	09:30	
	Out	18:30	
Audit type	Full initial		
Was the audit announced?	Semi announced		

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Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Mr. Deepak Shriram / Head - HR and Accounts

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No trade union in the facility.		
Reason for absence during the audit	No trade union in the facility.		
Reason for absence at the closing meeting	No trade union in the facility.		

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)

This is a semi-announced audit with 30 days window period starting from December 04, 2025 to January 03, 2026.

Lead auditor	Kishore Sharfudeen	APSCA Number	21704882
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Additional auditor	Anisur Rahaman	APSCA Number	21701376
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Date of declaration	2025-12-06
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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. Deepak Shriram
Title	Head - HR and Accounts
Date of declaration	2025-12-06

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
0. Enabling accurate assessment	0.C Provide an accurate site description and ...	Local law	NC ZAF-
3. Working conditions are safe and hygienic	3.K Ensure that all premises are safe and hav...	Local law	NC ZAF-
	3.L Implement effective processes to manage f...	Local law	NC ZAF-
	3.L Implement effective processes to manage f...	Local law	NC ZAF-
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF-
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF-
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF-

Findings: non-compliances

ZAF-

Non-compliance

Code area

0 Enabling accurate assessment

Status

Open*

Workplace requirement

0.C Provide an accurate site description and Sedex site profile declared prior to or during the audit.

Time given to resolve

30 days

Issue title

34 - Site is operating without all required in-date licences and permits (e.g. business/factory licence has expired)

Verification method

Desktop audit

Description

The facility has not obtained Factory License to operate from the relevent authority,however the facility filled an application on 25th November 2025.

Area of non-compliance/non-conformance

Local law

Corrective and preventative actions

The facility shall obtain Factory License to operate from the relevent authority.

Local law reference

In accordance with the Maharashtra Factories Rules, 1963 – Section 4. Use of premises as a factory - No occupier shall use any premises as a factory unless - (4) A licence is obtained under rule 6 from the Chief Inspector of Factories or renewed under rule 8 by the Deputy Chief Inspector of Factories, and the said licence is valid at the relevant time

* PDF generated at 12:50 (UTC) on 06 Dec 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

10.A Environment 2-Pillar

Status

Open*

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[Management systems →](#)

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

598 - The site does not have all legally required permits for use and/or disposal of resources (e.g. energy, water, air emissions, waste etc.)

Area of non-compliance/non-conformance

Local law

Description

During discussions with facility management, it was noted that the facility has not yet obtained consent under the Air and Water Acts or the Hazardous Substances Rules, and no application is currently in process.

Corrective and preventative actions

Facility shall apply and obtain consent under the Air and Water Acts or the Hazardous Substances Rules.

Local law reference

WATER (PREVENTION AND CONTROL OF POLLUTION) ACT, 1974 CHAPTER V - PREVENTION AND CONTROL OF WATER POLLUTION 25. Restrictions on new outlets and new discharges – (1) Subject to the provisions of this section, no person shall, without the previous consent of the State Board- (a) establish or take any steps to establish any industry, operation or process, or any treatment and disposal system or any extension or addition thereto, which is likely to discharge sewage or trade effluent into a stream or well or sewer or on land (such discharge being hereafter in this section referred to as discharge of sewage); or (b) bring into use any new or altered outlet for the discharge of sewage; or (c) begin to make any new discharge of sewage: PROVIDED that a person in the process of taking any steps to establish any industry, operation or process immediately before the commencement of the Water (Prevention and Control of Pollution) Amendment Act, 1988, for which no consent was necessary prior to such commencement, may continue to do so for a period of three months from such commencement or, if he has made an application for such consent, within the said period of three months, till the disposal of such application. THE AIR (PREVENTION AND CONTROL OF POLLUTION) ACT, 1981 CHAPTER IV - PREVENTION AND CONTROL OF AIR POLLUTION 21. Restrictions on use of certain industrial plants.— (1) Subject to the provisions of this section, no person shall, without the previous consent of the State Board, establish or operate any industrial plant in an air pollution control area: Provided that a person operating any industrial plant in any air pollution control area immediately before the commencement of section 9 of the Air (Prevention and Control of Pollution) Amendment Act, 1987, for which no consent was necessary prior to such commencement, may continue to do so for a period of three months from such commencement or, if he has made an application for such consent within the said period of three months, till the disposal of such application. (2) An application for consent of the State Board under sub-section (1) shall be accompanied by such fees as may be prescribed and shall be made in the prescribed form and shall contain the particulars of the industrial plant and such other particulars as may be prescribed.

* PDF generated at 12:50 (UTC) on 06 Dec 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*

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Workplace requirement

3.K Ensure that all premises are safe and have valid safety certifications for their current layout and use. If it is currently not possible for a required license or certificate to be obtained, implement inspections by appropriate third parties to ensure building safety.

Time given to resolve

90 days

Verification method

Desktop audit

Issue title

854 - Buildings at the site are missing key safety documents but this does not imply significant or immediate risk (e.g. the site has the house property certificate but cannot demonstrate the building construction acceptance report or the construction safety appraisal report)

Area of non-compliance/non-conformance

Local law

Description

The facility has not obtained approval of the building plan and certificate of stability of the premises in which the facility is in operation from the relevant authority, however the facility filled an application on 25th November 2025.

Corrective and preventative actions

The facility shall obtain approval of the building plan and a certificate of stability of the premises in which the facility is in operation from the relevant authority.

Local law reference

In accordance with the Maharashtra Factories Rules, 1963 – Sec 4. Use of premises as a factory - No occupier shall use any premises as a factory unless - (1) The plans are got approved from the Chief Inspector of Factories or the Deputy Inspector of Factories as the case may be, in respect of the following items namely:- (a) site on which the factory is to be situated; (b) buildings and extension used for the purposes of manufacturing process; (c) The layout of plant and machinery, including the storages for raw materials and finished products, intermediate by-products; (d) any changes total or partial in manufacturing processes. (2) The factory building, extensions, processes, and machinery layout are in conformity with the approved plans; (3) The conditions subject to which plans are approved are complied with; (4) A licence is obtained under rule 6 from the Chief Inspector of Factories or renewed under rule 8 by the Deputy Chief Inspector of Factories and the said licence is valid at the relevant time; In accordance with the Maharashtra Factories Rules, 1963 – Sec 3A. Certificate of Stability - (1) No manufacturing process shall be carried out in any premises of a factory constructed, reconstructed or extended or in any premises which has been taken into use as a factory or part of a factory until a certificate of stability issued by a competent person in respect of every work of engineering construction in the Form 1-A has been sent by the Occupier of the factory to the Chief Inspector of Factories, and approved by him.

* PDF generated at 12:50 (UTC) on 06 Dec 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.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

197 - Inadequate signage/instructions of fire alarm

Area of non-compliance/non-conformance

Local law

Description

During the facility tour, it was noted that operating instructions were not displayed near the fire alarm call points installed in the factory.

Corrective and preventative actions

Facility shall ensure that all employees including newly joined employees know how to activate the alarm quickly and correctly during an emergency, reducing response time.

Local law reference

In accordance with the Factories Act 1948, Section 38 (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.

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ZAF-

Non-compliance

Code area

3 Working conditions are safe and hygienic

Status

Open*

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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

172 - Fire licence, inspection or certificates not in place as required by law

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Description

Based on the review of document and interaction with management, it was noted that facility's existing Fire NOC dated 14th May 2024 has expired on 14th May 2025, however the facility filled an application on 1st December 2025.

Corrective and preventative actions

Facility shall obtain fire license at the earliest.

Local law reference

In accordance with Section 21 of "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, Private Town Ships etc

* PDF generated at 12:50 (UTC) on 06 Dec 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.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic/not clean

Area of non-compliance/non-conformance

Local law

Description

During the factory tour, it was noted that toilets in 1 out of 1 male toilet block on the ground floor were unclean and in an unhygienic condition. It was further noted that no exhaust fan had been installed.

Corrective and preventative actions

The factory shall ensure that toilets are in cleaned and unhygienic conditions.

Local law reference

In accordance with the Factories Act, 1948, Chapter 2, Article 19(1c&d): Toilets shall be adequately lit, ventilated, cleaned and in sanitary condition at all times.

* PDF generated at 12:50 (UTC) on 06 Dec 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-

Non-compliance

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

426 - Regular practice of delayed payment of social insurance and other legally mandated contributions to relevant authorities

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Description

During the records review, delayed remittance of ESI contributions was noted in all three sampled months—January 2025, April 2025, and October 2025. The delays ranged from 01 to 09 days.

Corrective and preventative actions

The facility shall ensure that ESI contributions are remitted by the 15th of the following month, in accordance with legal requirements.

Local law reference

Amendment to Regulation 31 of the Employees' State insurance (General) Regulations, 1950 - copy of Gazelle Notification. A copy of Gazette of India, Part — III. Section 4 containing notification no. N12/13/1/2016 - P&D dated 01 .07.2017 is circulated for information and Compliance. Regulation 31 stands amended whereby the contribution in respect of any employee shall be paid within 15 days of the last day of the calendar month in which the contributions fall due. This shall come into force with effect from the contribution payable for the month of June 2017 i.e. by 15th July. 2017.

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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				
10.C. Business ethics				

 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](#)