



COMPANIES: Fast Retailing Co., Ltd.

COUNTRY: Bangladesh

ASSESSMENT DATE: 12/06/16

ASSESSOR: Insync Global

PRODUCTS: Apparel

NUMBER OF WORKERS: 10539

FLA Comments

This report was submitted with a corresponding corrective action plan to the FLA and was reviewed by FLA staff. In an effort to improve the effectiveness of remediation, the FLA has provided feedback and recommendations to the company. While the company has agreed to and incorporated most of these recommendations, this was not the case for worker probationary periods. The report is posted in its current state and is considered finalized. Updates on the progress of the corrective action will be posted when received from the company.

Understanding this Assessment Report

This is a report of a workplace assessment conducted by Fair Labor Association assessors following FLA's Sustainable Compliance methodology (SCI), which evaluates a facility's performance in upholding fair labor standards through effective management practices throughout the entire employment life cycle.

This report identifies violations and risks of noncompliance with the Fair Labor Association Workplace Code of Conduct in its assessment of the employment functions, and includes a description of the root causes of violations, recommendations for sustainable and immediate improvement, and the corrective action plan for each risk or violation as submitted by the company. This document is not a static report; rather, it reflects the most recent progress updates on remediation in the "Progress Update" section for each finding.

Summary of Code Violations

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

FLA Code Element	Violations
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Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. The factory does not have formal written policies on the following Employment Functions: Personnel Development; Industrial Relations; and Retrenchment.
2. The factory does not have formal written procedures on the following Employment Functions: Recruitment, Hiring & Personnel Development; Compensation; Hours of Work; Termination & Retrenchment; Industrial Relations; and Environmental Protection. However, there are some documents and systems in place to manage Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination, and Environmental Protection.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1, ER.19, ER.23, ER.25, ER.28, ER.29, ER.30, and ER.32)

COMPANY ACTION PLANS

1. We are working to establish written policies on the following employment functions: Personal Development; Industrial Relation; and Retrenchment.

Planned Completion Date

05/31/17

Action plan status:

In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is in process to have the policy on said functions

2. We are working to establish written procedures on the following employment functions: Recruitment, Hiring & Personnel Development;

Compensation; Hours of Work; Termination & Retrenchment; Industrial Relations; and Environmental Protection.

Planned Completion Date

05/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is working to include the missing employment function.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The orientation program covers the Termination & Retrenchment, Workplace Conduct & Discipline, and Grievance System policies, but does not cover the procedures. Management stated that orientation covers the Termination process, but the list of topics covered in the orientation program did not include Termination.

2. The factory does not provide ongoing training to workers on the following Employment Functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment; Industrial Relations; Workplace Conduct & Discipline; Environmental Protection.

Furthermore, only 1,569 out of 8,689 workers (18%) have received Grievance System training and the training calendar does not define the plan to cover 100% of workers.

3. Periodic Health & Safety training programs are conducted. In the 12 months prior to the assessment, 15% of workers were trained on general Health & Safety, 11% of workers received specific training on the use of PPE, and 67% of maintenance staff were trained on maintenance safety. The factory plans to train all workers, but no training calendar has been prepared. Workers are not trained on proper lifting techniques and no training is provided to workers who must enter confined spaces.

4. The factory has a training program for supervisors, but the training does not cover the following Employment Functions: Recruitment, Hiring & Personnel Development; Termination & Retrenchment; Industrial Relations; Environmental Protection. Some limited awareness of the grievance handling procedures is provided. So far, 117 out of 208 supervisors have received this training. The quality of the training program is questionable, though, as it includes a topic termed "no precarious employment," which no one on the HR team could define. They stated that it was mentioned in one of their customers' code of conduct and was therefore used by the factory as well.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, ER.15, and ER.17; Health, Safety & Environment Benchmarks HSE.8, HSE.14, and HSE.17)

COMPANY ACTION PLANS

1. 2. We have started to provide ongoing training to workers on the following Employment Functions: Recruitment, Hiring & Personnel Development, Termination & Retrenchment; Industrial Relations; Workplace Conduct & Discipline; Environmental Protection. We have prepared training plan for 100% workers covering all topics including grievance System.

Planned Completion Date

12/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory started to provide the training on missing function and planning to define in to training calendar.

2. 3. We have reviewed & revised the training calendar to cover all workers. In addition of existing training we have started to provide training on proper lifting techniques. Training also providing to the workers who must enter confined spaces.

Planned Completion Date

12/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is re engineering their training calendar and in addition is planning to have lifting technique.

3. 4. We have revised the supervisors training module by covering all required areas including following Employment Functions: Recruitment, Hiring & Personnel Development; Termination & Retrenchment; Industrial Relations; Environmental Protection and the details of grievance handling procedures. We all ensure the quality of the training and will cover all supervisors.

Planned Completion Date
05/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is working to revise the methodology for giving training to supervisor.

4. 1. We have revised the orientation program module by covering all required policies & procedures (Like Termination & Retrenchment, Workplace Conduct & Discipline, and Grievance System etc.)

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory added the termination clause as per BEPZA instruction on July 03,2017 and done the orientation program

Completion date: 04/19/17

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

1. The factory does not communicate the Recruitment, Hiring & Personnel Development, Retrenchment, Industrial Relations, Grievance System, or Environmental Protection policies and procedures and their updates to the general workforce.
2. The factory does not fully communicate with the general workforce on Hours of Work, specifically regarding extraordinary business circumstances or other conditions that impact the workforce.
3. The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, ER.25, ER.29, and ER.30)

COMPANY ACTION PLANS

1. 1. We have already started to communicate the all company policies elaborately to the general workforce

Planned Completion Date

05/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory started to communicate the policy among general worker and it will be finish by 6 month.

2. 2. We have started to aware the general workforce on Hours of Work, specifically regarding extraordinary business circumstances or other conditions that impact the workforce.

Planned Completion Date

05/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Top manangement of factory is working on communication channel for general worker on it.

3. 3. We will establish the procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of our policies and procedures. We are also working to develop a system to integrate the workers in decision-making processes.

Planned Completion Date

12/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is working to establish procedure so that they could be consulted on decision making.

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

The factory has not reviewed any of its policies or procedures on any of the Employment Functions since they were first created. No review periods have been defined.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1, ER.29, ER.30, and ER.31)

COMPANY ACTION PLANS

1. We have already reviewed all of our policies and procedures and will continue the same on regular interval.

Planned Completion Date

05/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is working to update the policy on yearly basis.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. New workers' probationary period, as stated on workers' employment contracts, is four months long. This complies with the Bangladesh Export Processing Zone Authority (BEPZA), but does not comply with FLA requirements. In practice, however, workers' probationary period is actually six months long, as the factory does not confirm permanent employment until six months after hiring. This practice does not comply with BEPZA or FLA requirements.
2. The factory requires new recruits to obtain an age certificate from an external doctor and provide a copy of their national identity cards. The cost for these documents is borne by the recruits.

Local Law or Code Requirement

FLA Workplace Code (Compensation Benchmark C.3; Employment Relationship Benchmark ER.6)

Recommendations for Immediate Action

1. Change all existing workers' probation periods to three months and sign contracts with new workers with a three month probation period at most. Confirm permanent employment status after the completion of a three-month probation period.
2. Review the requirement for new recruits to obtain an age certificate from an external doctor and make appropriate arrangements for certificates to be obtained at no cost to recruits. Reimburse any new workers who have paid for age certificates within the last 12 months.

COMPANY ACTION PLANS

1. Actually New workers' probationary period is 4 months which clearly mentioned in the appointment letter. Though new workers permanent employment has confirmed after 4 months but wrongly it was mentioned 6 months in the sticker on the cover page of personal file. However, we have replaced the wrong sticker from the cover page of the file. We will continue the 4 months probationary period as per BEPZA instruction.

Planned Completion Date

12/10/16

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory will revise the employment contract in to three months since the FLA benchmark is stronger than BEPZA instruction.The revise deadline is August 2017

2. We have stopped such practices and confirming the new recruiters age through NID/Birth/Educational certificates or Company doctor's certificates.

Action plan status: Completed
Planned completion date: 05/20/17
Progress update: 12/08/17 : Factory stopped to get the age certificate from worker and get the NID.
Completion date: 01/30/17

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The written agreement (contract) between the factory and the canteen service provider does not impart power to the factory to pay the contract workers' salaries. Therefore the factory does not have a direct employment relationship with the contract workers. Furthermore, the contract between the factory and canteen service provider does not require that workers be provided 24 hours of rest in every seven-day period, nor does it define the maximum hours of work, the minimum wage and overtime payments, minimum age requirements, or Health & Safety requirements. However, there were no issues in practice.
2. Probationary workers do not receive performance reviews.
3. Workers are not promoted in a fair and transparent way. Supervisors verbally recommend workers to the industrial engineering team, who then conduct an in-depth technical performance evaluation. The results are forwarded to the production team, who conduct their own evaluation of the worker's technical knowledge and performance. If the results are satisfactory, they are forwarded to the HR team. Workers are then promoted based on the outcome of these evaluations. However, the performance evaluation sheets do not include any information regarding the period during which the evaluation was conducted, the worker's efficiency scores, work performance, or the grades obtained. The worker's total score (out of 100), which should be used to recommend workers for promotion, is not provided either. Furthermore, none of the ten randomly sampled performance evaluation sheets were signed by the a supervisor or the worker. Workers are informed of the results verbally. There is no evidence that workers are given the opportunity to provide feedback.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.6, ER.29, and ER.30; Nondiscrimination Benchmark ND.2)

COMPANY ACTION PLANS

1. 1. We will revise the contract between the factory and canteen service provider by clearly mentioning all legal requirements like (24 hours of rest in every seven-day period, maximum hours of work, the minimum wage and overtime payments, minimum age requirements, Health & Safety requirements etc.).

Planned Completion Date

06/06/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 2. We will start to review the performance of Probationary workers.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 3. We will develop proper performance evaluation / review system with procedures including details and process of the system. We will implement & follow the performance review procedures to recommend workers for promotion.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. During the factory tour, assessors noted that all 30 workers from the fusing department, seven randomly selected workers from the sewing department, and two randomly selected workers from the 3D section are designated as helpers on their ID cards, but were operating fusing machines, stapler machines, and 3D machines. A review of employment documents and pay records from October 2016 showed that these workers were originally hired as helpers with a monthly salary of BDT 5,600 (USD 70.98). The workers operating stapler machines and 3D machines were still being paid BDT 5,600 (USD 70.98) per month; but the workers operating fusing machines had their wages increased to BDT 6,104 (USD 77.36) per month. Legally, all of these workers should be paid BDT 6,440 (USD 81.62) and have their designations changed to junior operators due to the nature of their work.
2. Wage records are not maintained for outsourced Canteen workers.

Local Law or Code Requirement

Bangladesh Export Processing Zone Authority Circular No. 2065, dated December 24, 2013; FLA Workplace Code (Compensation Benchmarks C.1, C.2, and C.15; Employment Relationship Benchmark ER.2)

Recommendations for Immediate Action

1. Designate the workers operating fusing, stapler, and 3D machines as junior operators. Pay these workers the legally required wages for their skill level.
2. Maintain wage records pertaining to the three outsourced Canteen workers. Make these records available to assessors upon request.

COMPANY ACTION PLANS

1. 2. We will maintain the wage records for outsourced canteen workers & will include this implementation in factory compensation procedures.

Planned Completion Date

06/06/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 1. Those workers salaries already upgraded. Workers job, Designation & minimum wages has ensured based on their job description. Some of the machines (like Stapler) can operate easily by any fresh worker. In such cases we are designated them as helper and reviewing their work procedure and performance on timely basis and upgrade their designation & salary accordingly after 4 months or before.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory started to promote Helper to Junior Operator from January 2017 and at this moment the total number of worker are 409. Management found that turnover of the helper less than before by implimenation of the policy.

Completion date: 03/30/17

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. According to the factory's records (last updated on November 6, 2016) 13,148 employees are covered with life insurance; however, there are currently only 11,457 employees working in the factory. Former employees have not been removed from the list of covered employees, as required by law.
2. Monetary incentives are provided to workers from all departments, but there are no defined criteria for providing incentives and no documentation is maintained. Department heads and supervisors grade workers on their performance, based on which the HR team provides incentives.
3. The Compensation policy simply states that wages will be paid per the Bangladesh Export Processing Zone directions. No details are provided on the wages that will be paid based on skill level, pay periods and pay days, the payment of attendance and tiffin allowances, the provision of food allowances if workers work more than two hours of overtime, or the conditions for the conveyance (commuter) allowance.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 99; FLA Workplace Code (Compensation Benchmarks C.1 and C.17; Employment Relationship Benchmarks ER.1 and ER.2)

COMPANY ACTION PLANS

1. 2. We will define proper criteria for incentive system. We will also include the incentive criterias and details in factory's compensation procedures.

Planned Completion Date

08/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 3. As per BEPZA instruction we are paying wages & other benefits to the workers. However, we will revise the compensation policy by covering all related areas (Like wages grade, skill level for salary fixation, pay periods and pay days, the payment of attendance and tiffin allowances, the provision of food allowances if workers work more than two hours of overtime, or the conditions for the conveyance (commuter) allowance etc.).

Planned Completion Date

01/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 1. Basically life insurance record is updating every after two months according to the agreement with Insurance Company & BGMEA. However, the life insurance list has updated duly.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory management started to submit the lefty worker in to insurance management system. As per the record sent on March 2017 there were 1547 employee has been left.

Completion date: 01/07/17

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. During a review of records from October 2015, February 2016, and October 2016, assessors noted the following instances of workers working more than 60 hours per week, in violation of the FLA Code:a. In October 2015, all 10 sampled workers from the wet processing department worked 60 to 72 hours per week during the first and second weeks of the month; all five sampled workers each from the cutting and sewing departments worked 60 to 68 hours per week during the second and fourth weeks of the month; and all five sampled workers from the finishing department worked 60 to 72 hours per week during the first and third weeks of the month.b. In February 2016, all five workers each from the cutting and sewing departments worked 60 to 68 hours per week during second week of the month, and all 10 sampled workers from the finishing department worked 60 to 72 hours per week during the first and second weeks of the month.c. In October 2016, all 25 sampled workers from the wet processing department worked 60 to 81.5 hours per week during the third and fourth weeks of the month; all 10 sampled workers from the cutting department and all 15 sampled workers from the sewing department worked 60 to 68 hours per week during the second and fourth weeks of the month; all 10 sampled workers from the finishing department worked 60 to 74 hours per week during the second and fourth weeks of the month; and all five sampled workers from both the maintenance and housekeeping departments worked 60 to 88 hours per week during the second and fourth weeks of the month.
2. During a review of records from October 2015, February 2016, and October 2016, assessors noted the following instances of workers working more than 10 hours per day, in violation of local law:a. In October 2015, all 10 sampled workers from the wet processing department and five out of five sampled workers from the finishing department worked 10 to 12 hours per day on nine days in the month.b. In October 2016, 15 out of 25 sampled workers from the wet processing department worked 10 to 15 hours per day on seven to 10 days in the month. 10 out of 10 sampled workers from the finishing department and three out of five sampled workers from the maintenance department worked 10 to 15 hours per day on six days in the month.
3. The factory's working hours records do not identify pregnant and lactating workers.
4. Service books are not updated with leave information, as required by law.
5. The Hours of Work policy does not provide any information on working hours during extraordinary business circumstances, weekly rest days, break times, or the working hours for the washing section (the washing section works on two shifts).

Local Law or Code Requirement

Bangladesh Labour Act 2006, Sections 6, 100, and 102; FLA Workplace Code (Employment Relationship Benchmark ER.1, ER.2, and ER.23; Hours of Work Benchmarks HOW.1, HOW.5, and HOW.8)

Recommendations for Immediate Action

Monitor working hours and ensure that workers do not work more than 60 hours per week and 10 hours per day.

COMPANY ACTION PLANS

1. 1. Considering the certain circumstances only 2-5% workers has worked more than 60 hours in a week. We have already taken following steps to reduce the excessive overtime:

Ø We have started to monitor the working hours on daily & weekly basis. If someone who work close to excessive working hours, the system alert to the concern supervisor / Head of the department.

Ø We are planning to install new modern machineries to reduce the excessive overtime.

Ø Increasing production capacity.

Ø Factory has started awareness program for limiting unauthorized & high absenteeism of the workers.

Ø Internal training for the workers has been arranged about new process and critical style.

Ø We have started shifting duty in few sections.

Ø Production Planning has developed by the factory considering 8 hours working per day.

However, factory is committed & will adopt practices and controls to ensure that employee are not needed to work more than the required working hours as per Local law.

Planned Completion Date

01/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 2. Considering the certain circumstances only 2-5% workers has worked more than 60 hours in a week. We have already taken following steps to reduce the excessive overtime:

Ø We have started to monitor the working hours on daily & weekly basis. If someone who work close to excessive working hours, the system alert to the concern supervisor / Head of the department.

Ø We are planning to install new modern machineries to reduce the excessive overtime.

Ø Increasing production capacity.

Ø Factory has started awareness program for limiting unauthorized & high absenteeism of the workers.

Ø Internal training for the workers has been arranged about new process and critical style.

Ø We have started shifting duty in few sections.

Ø Production Planning has developed by the factory considering 8 hours working per day.

However, factory is committed & will adopt practices and controls to ensure that employee are not needed to work more than the required working hours as per Local law.

Planned Completion Date

01/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 3. We will mark in the working hours records to identify pregnant and lactating workers.

Planned Completion Date

05/06/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 4. We are maintaining the service book including leave information through software.

Planned Completion Date

04/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

5. 5. We will update the working hour policy by including information on working hours during extraordinary business circumstances, weekly rest days, break times, or the working hours for the washing section (the washing section works on two shifts)

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. The worker representatives in the Workers Welfare Association are selected by management, not elected by workers as legally required.
2. Management interferes with the administration and daily operation of the Worker Welfare Association. Meetings are conducted based on the availability of management representatives.
3. Workers inside the export processing zone are not legally allowed to form or join unions or worker representative structures other than the Worker Welfare Association.

Local Law or Code Requirement

EPZ Workers' Welfare Association and Industrial Relation Act No. 43 of 2010; FLA Workplace Code (Freedom of Association Benchmarks FOA.1, FOA.2, FOA.10, and FOA.11)

COMPANY ACTION PLANS

1. According to Section 05 & 06 of "EPZ Workers welfare Association & Industrial relations Act" of 2010 the management has taken all lawful steps (such as: Served the notice to the notice Board, Inform the workers through PA System, Discuss with Workers Welfare Committee members, make easy availability of "KHA form" in the HRD etc.). Since required number of workers as per law did not response to form WWA, hence there is nothing to do from the part of the Management. At Present WWC (Workers Welfare Committee) have been functioning and every two months interval we are conducting a meeting with the committee members and take necessary steps accordingly as per decision of the meeting.

However, we will take initiative to arrange more awareness program with workers on formation of Workers Welfare Association (WWA). We will also Inform the workers through PA System, make announcement in each department regarding WWA and the functions of worker representatives and benefits for the workers in addition to serving notice on notice boards.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 3. Factory does not have restrictions on forming, joining unions and on freedom of association rights of the workers and it is clearly stated in factory policy & procedures. According to Section 05 & 06 of "EPZ Workers welfare Association & Industrial relations Act" of 2010 the management has taken all lawful steps (such as: Served the notice to the notice Board, Inform the workers through PA System, Discuss with Workers Welfare Committee members, make easy availability of "KHA form" in the HRD etc.). Since required number of workers as per law did not response to form WWA, hence there is nothing to do from the part of the Management. At Present WWC (Workers Welfare Committee) have been functioning and every two months interval we are conducting a meeting with the committee members and take necessary steps accordingly as per decision of the meeting.

However, we will take initiative to arrange more awareness program with workers on formation of Workers Welfare Association (WWA).

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 2. We have already stopped such practices. We are also conducting meeting on timely basis as required by workers committee.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory conducted the WWC meeting on 29.4.2017 & 21.05.2017 to discuss the required subject as per need of the worker and management.

Completion date: 05/30/17

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. According to factory policy, unauthorized absenteeism over 10 days is considered misconduct and attracts disciplinary action. However, in practice the factory terminates the employment of workers who are absent for more than 10 days without taking disciplinary action first. This practice does not comply with legal requirements, which state that the worker must be sent three written warning letters

before their employment is terminated.

2. The factory maintains two separate sets of grievance records. One set of records is maintained for grievances received through the grievance box and a second set is maintained for grievances reported verbally. A review of the first set of records revealed that grievances pertaining to the periodic unavailability of water in toilets and unclean dining tables have been recorded, but three grievances reported on December 23, 2015, December 24, 2015, and January 17, 2016 were filed separately and were not recorded in the designated register. These grievances were all from female workers; one woman reported harassment by a supervisor (for not meeting her production target), another woman reported physical abuse by a supervisor (the worker reported that the supervisor slapped her), and a third woman reported physical abuse by a male co-worker (the worker reported that her co-worker touched her inappropriately). Disciplinary action was not documented; management stated that the concerned supervisors and the male co-worker were warned verbally. Two of the female workers resigned less than a month after filing their complaints. The third is still working in the factory. No reports of harassment or abuse have been submitted recently. Interviews with workers confirmed that no such instances have occurred within the last six months.

3. The factory does document the steps taken to address the submitted grievances, nor does it communicate to the workforce regarding the resolution of grievances.

4. The second set of grievance records includes complaints pertaining to unclean dining areas, poor quality of snacks, and poor quality of water. The record states that action was taken regarding the complaint of poor water quality, but does not state what that action was. Hence, it cannot be verified if the grievance was addressed in a sustainable manner.

5. The Workplace Conduct & Discipline procedures do not define the nature of misconduct and resulting disciplinary actions, though the same is defined in the employee handbook provided to all employees. The procedures also do not cover the timelines for taking disciplinary action, the need to record verbal warnings, or the steps for workers to appeal disciplinary actions taken against them.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 23; FLA Workplace Code (Employment Relationship Benchmark ER.2 and ER.27; Harassment or Abuse Benchmarks H/A.1, H/A.4, H/A.5, H/A.8, H/A.9, and H/A.11)

Recommendations for Immediate Action

1. Comply with legal requirements and initiate the appropriate disciplinary actions before terminating workers for unauthorized absence.
2. Appropriately discipline all workers and supervisors who engage in harassment or abuse of workers. Maintain records of all disciplinary actions taken. Communicate to supervisors that the harassment and abuse of workers is not tolerated and will result in disciplinary action.

COMPANY ACTION PLANS

1. 5. We will review the workplace conduct & discipline procedures to define the Nature of misconduct and resulting disciplinary actions. We will also cover the timelines for taking disciplinary action, the need to record verbal warnings, or the steps for workers to appeal disciplinary actions taken against them in the procedures.

Planned Completion Date

10/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 1. We have started to take disciplinary action against the workers for unauthorized absenteeism over 10 days as per BEPZA instruction. We will follow the same on regular basis.

Planned Completion Date

03/30/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: Factory management started the procedure for disciplinary action and implementation will be done by August 2017.

3. 3. We have started to communicate to the workforce regarding the resolution of grievances both verbally / written. In case of verbal communication we are taking the signature of concern workers in the grievance register.

Planned Completion Date

01/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: This issue is not completed as worker did not get the signed after resolve the grivence

4. 4. We will maintain the details of action taken against the grievances and definitely will address the grievances in a sustainable manner.

Planned Completion Date

06/30/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: Factory is taking the action with engeering department to resolve the issue and will maintain.

5. 2. Factory has Zero tolerance policy regarding any kinds of harassment & abuse. Proper procedures also in place to handle the grievances including harassment and abuse problem. As per policy & procedures factory Admin. department initiate the necessary disciplinary action (Like verbal warning, serving show cause notice, serving show cause with suspension notice etc.) immediately after receive the grievances including harassment and abuse problem. All the disciplinary actions are documented and proper actions are maintained. All grievance records are properly kept.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: Factory conducted the training to the mid management on february 2017 and there was a complain in the verbal complain register on June 22,2017 about the job area allocation since she is pregnanant and interviewed the worker to verify the case. FR team advised to put the evidence in to the register and make details action plan.

Completion date: 06/30/17

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

The Grievance System procedures do not: provide any information on how or when grievances will be handled and addressed, allow the direct settlement of the grievance by the worker and the immediate supervisor, protect workers against retaliation.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.25)

COMPANY ACTION PLANS

1. 1. We will revise the Grievance System procedures with information on how or when grievances will be handled and addressed, allow the direct settlement of the grievance by the worker and the immediate supervisor, protect workers against retaliation.

Planned Completion Date

10/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

FINDING NO.13

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The Environmental Protection policy does not include a statement of the factory management's general support of energy and water efficiency, or a commitment to minimize impacts with respect to air emissions, waste, hazardous materials, and other applicable environmental risks.

2. The factory does not have any procedures to deal with an environmental emergency.

3. The documents and systems in place to manage Environmental Protection practices do not cover the environmental impact within the factory. For example, the Environmental Protection documents and systems do not include steps for the disposal of the cloth gloves used while spraying potassium permanganate (PP). The documents and systems do not include procedures that enable workers to raise environmental concerns, procedures for reporting environmental emergencies, or procedures that protect workers who allege environmental violations against retaliation, either.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmark HSE.5)

COMPANY ACTION PLANS

1. 1. We will revise the Environmental Protection policy by including a statement of the factory management's general support of

energy and water efficiency, or a commitment to minimize impacts with respect to air emissions, waste, hazardous materials, and other applicable environmental risks.

Planned Completion Date
06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 2. We will develop required procedure to deal with an environmental emergency.

Planned Completion Date
06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 3. We will review & revise the environmental protection policies as suggested by FLA.

Planned Completion Date
06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The waste material storage bins located near the entrance to staircase no. 3 are not covered and secured, and access is not restricted. Furthermore, a few broken fused tube lights and old chemical containers were seen in the bins. These items are hazardous waste and should be segregated from non-hazardous waste and stored in a well-ventilated hazardous waste storage room with restricted access.
2. An empty gas cylinder, new tube lights, polycarbonate sheets, a chemical used in the power generator (NALCO), and five barrels of acetone (two full, three empty) are stored together in a room under staircase no.3 instead of in the chemical storage room.
3. Neither secondary containment nor spill response kits are provided in the storage area under staircase no. 3 where the NALCO and acetone are stored. The factory has not provided a spill response kit near the chemical tank in the effluent treatment plant.
4. The factory has not identified whether its on-site operations generate any negative environmental impacts, nor is it making efforts to reduce its environmental impact besides reducing its energy consumption.

Local Law or Code Requirement

Factories Rules 1979, Section 43; FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmarks HSE.6 and HSE.9)

Recommendations for Immediate Action

1. Ensure that all waste material storage bins are covered and secured. Do not store waste in the open; move waste storage bins located near staircase no. 3 to a waste storage room with restricted access.
2. Segregate hazardous waste from non-hazardous waste. Store hazardous waste (such as tube lights and old chemical containers) in a separate, well-ventilated storage room with restricted access.
3. Do not store empty gas cylinders, new tube lights, polycarbonate sheets, NALCO, and barrels of acetone under staircase no. 3. New tube lights should be stored in the electrical storage room; empty gas cylinders should be stored in a well-ventilated storage area away from any oils or chemicals; chemicals should be stored in a designated chemical storage room.
4. Provide secondary containment for all chemical containers. Provide spill response kits in every area where chemicals are used or stored.

COMPANY ACTION PLANS

1. 1. We will segregate the hazardous & non hazardous waste properly. We will also store the hazardous waste in a well-ventilated waste storage room with restricted access.

Planned Completion Date
07/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 3. We will provide secondary containment with spill response kit at all required areas.

Planned Completion Date

07/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 4. We will arrange to conduct EIA to know about the environmental impacts of the factory. We will also take necessary measures to reduce energy consumption.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 2. We are working to arrange a proper place to keep all hazardous & nonhazardous items separately.

Planned Completion Date

07/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is working to relocate area and maintain in to chemical storage room.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not commissioned a fire risk assessment by a third-party expert.
2. Rubber floor mats, to prevent rivets from scattering, are provided under the rivet attaching machines and under seating arrangements for workers. In case of evacuation, these rubber mats could restrict the quick and easy movement of workers' stools, resulting in injury to workers.
3. Workers in the color spray section located on the first floor must stand in the evacuation aisles while spraying, since there is no space for them to work.
4. There are no warning signs posted near the elevator doors on the first, third, fourth, fifth, sixth, or seventh floors to prevent the use of the elevators in case of fire.
5. The fire hydrants and fire extinguishers located near the loading area and the exit from the washing section are blocked by trolleys and parked cars.
6. The fire hydrant system is stored in a cabinet in the back of the fabric storage room. This cabinet was partially obstructed by fabric bundles stored in front of the cabinet, making it difficult to open the cabinet doors. Mechanical and hydraulic lifters were also parked in the evacuation aisles in the fabric storage room. One trolley was chained and locked to a table, obstructing the fire cabinet.
7. The markings on the wall outside the factory indicating the emergency assembly points are not clearly visible and are obstructed by plants.
8. Pallets used to store fabric bundles and fabric bundles are placed in evacuation routes in the fabric store.
9. The aisles and evacuation routes are not marked between the hydro machines in the washing department. Garment trolleys were parked in a haphazard manner, restricting free movement and partially blocking 40% of the evacuation routes.
10. The emergency light installed near the chemical store is not functional.
11. The washing and blow out sections are congested with inadequate space for free movement of workers and trolleys carrying washed garments.
12. Convex mirrors are not installed on corners of staircases to warn workers climbing up or down the stairs in order to avoid accidental collision.
13. New recruits waiting to complete their employment documentation were standing in checking areas in the washing department and near the child care room. These workers are new and are not aware of the evacuation procedures from these work areas, which could pose a risk in case of emergency. The presence of these workers also caused overcrowding in these work areas.
14. Five of the emergency lights installed in the factory (in the PP spray section and near the 3D section) are focused towards the ceiling and not on the evacuation paths.
15. Tables were blocking access to the evacuation routes from a few areas in the sewing section, buttoning section, loop cutting and scrapping sections. Garments placed on pallets on the floor were blocking access to evacuation routes from 100% of the work areas in the stapler, blow out, and fusing sections. Workers were completely blocked in their work stations with no access to walkways.
16. Fusing workers were working with machines generating heat and current practice could result in major injuries in case of an evacuation process.
17. Assessors observed garments stored on the hot motors of the reversing machines, which poses a fire risk.

Local Law or Code Requirement

Bangladesh Factories Rules, Rules 37 and 51; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 HSE.5, HSE.6, and HSE.14)

Recommendations for Immediate Action

1. Commission a third-party expert to conduct a fire risk assessment.
2. Remove rubber mats from underneath rivet machine operators' stools.
3. Make appropriate arrangements so that workers in the color spray section on the first floor do not have to stand in the evacuation routes while spraying.
4. Post warning signs near lift doors on all floors.
5. Clear any obstructions blocking access to fire hydrants and fire extinguishers located near the loading area and the exit from the washing section.
6. Clear any obstructions blocking access to the fire cabinet in the back of the fabric storage room. Ensure that mechanical and hydraulic lifters are not parked in the evacuation aisles in the fabric storage room.
7. Repaint the markings on the wall outside the factory indicating the emergency assembly points. Trim or remove any plants that obstruct the markings.
8. Do not place pallets or fabric bundles in the evacuation routes in the fabric store. Keep evacuation routes clear at all times.
9. Mark the aisles and evacuation routes between the hydro machines in the washing department. Ensure that parked garment trolleys do not block the evacuation routes in the washing department.
10. Repair or replace the emergency light installed near the chemical store.
11. Rearrange and decongest the work areas in the washing and blow out sections so that workers and trolleys to move about freely.
12. Install convex mirrors in the corners of staircases.
13. Ensure that everyone allowed access to the work areas is aware of the evacuation procedures. Also ensure that work areas are not overcrowded.
14. Refocus the emergency lights in the PP spray section and near the 3D section so that they shine on the evacuation paths.
15. Remove any obstructions blocking access to the evacuation routes in the sewing, buttoning, loop cutting, scrapping, stapler, blow out, and fusing sections. Rearrange and decongest the work areas so that workers can leave their workstations easily and have immediate access to evacuation routes.
16. Do not store garments on the hot motors of the reversing machines. Regularly monitor for compliance.

COMPANY ACTION PLANS

1. 1. We will commission a fire risk assessment by a third-party expert.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 2. We will find an alternate solutions to ensure the quick & easy movement of the workers in case of emergency.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 12. We will install convex mirrors on corners of staircases to warn workers climbing up or down the stairs in order to avoid accidental collision.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 13. We will provide a safe & designated place with sufficient seating arrangement for New recruits waiting to complete their employment documentation.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

5. 16. We will reorganize the fusing section to avoid any kinds of injuries in case of an evacuation process. We will conduct comprehensive risk assessment including all machine based risks and actions will be taken accordingly.

Planned Completion Date

05/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

6. 3. We have already reorganized the evacuation aisles at color spray section in 1sr floor. We have also ensured that those workers are not standing in the evacuation aisles anymore.

Planned Completion Date

03/30/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : The situation is remain same so factory is working to have the management system.

7. 5. We have marked the fire hydrants and fire extinguishers point properly to ensure that it will remain free at all the time. Necessary action also taken to ensure that exit from the washing section will remain free from all kinds of obstacles including trolleys. We will also train the workers on non obstruction of fire hoses and fire extinguishers

Planned Completion Date

03/30/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Fire extinuisher partially blocked by parked car.

8. 6. We have already removed the fabric bundle near the fire hydrant cabinet, also removed the mechanical and hydraulic lifters from evacuation aisles.

Planned Completion Date

01/03/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that fire hydrant found unblocked but aisles found partially blocked by hydrolic lifter.

9. 8. We have removed the Fabric bundle along with pallets from the evacuation routes in the fabric store.

Planned Completion Date

02/23/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Pallets has been changed the lay out of fabric keeping process to avoid blocked in the evacuation routes but in addition need to post the awarness poster.

10. 11. We have reorganized the Washing & blow out area for adequate space & to free movement of workers & trolleys.

Planned Completion Date

12/31/16

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Some of the area found like before and few found without congestion.

11. 15. We have removed the temporary blockages from the concern production areas and ensured the free access to all workers to the walkways. We will check & ensure the same on regular basis.

Planned Completion Date

01/03/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that evacuation route found sometimes with blockage

12. 17. We have trained the workers and already stopped the workers to store garments on the hot motors.

Planned Completion Date

03/15/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that the situation is same like before.

13. 4. We have already posted the warning sign near the elevators doors in all floors.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory posted a warning sign mentioning the capacity of person in front of elevators.

Completion date: 03/30/17

14. 7. We have already ensured that the markings on the wall outside the factory indicating the emergency assembly

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory already changed the assembly point card to visible area.

Completion date: 01/03/17

15. 9. We have marked the evacuation routes between the hydro machine in the washing department. We have also kept the trolleys properly to ensure the free evacuation routes.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory marked the evacuation route in the said area.

Completion date: 02/28/17

16. 10. We have replaced the emergency light near the chemical store which is now fully functional. We will check the emergency light on regular basis.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : It has been posted the emergency light near chemical store.

Completion date: 12/31/16

17. 14. We have re-installed the emergency lights in the PP spray section which now fully focused on evacuation paths.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Emergency light installed in the said area properly.

Completion date: 03/20/17

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. During the assessment, one cargo elevator was being operated even though the safety door (a foldable door that is pulled in from both sides) was not operational. Based on a visual inspection, it appears that the door is never used as it is rusty and when assessors attempted to open the door it was stuck on either side. A shutter door (a door that is pulled down) installed in front of the cage door was left open (pushed up). The elevator was descending, and the area on the fifth floor in front of the elevator was left open with no safety fence installed. This poses a critical safety risk.
2. The load capacity of the elevators is marked in English on the inner sidewall of the elevators, not outside the elevators. The load capacity is not marked on the mechanical lifters or on the hydraulic stackers used in the fabric storage room.
3. There are no signs indicating whether the elevators are intended for use by passengers and/or cargo marked outside the passenger elevator and two cargo elevators situated near the accessories storage room (north side) and the finishing department (west side).
4. Safety instructions are not displayed or posted near machinery.
5. Seven of the eight hydro machines used in the washing section did not have an emergency stop mechanism. The machines continued operating when the loading lids were lifted to check the emergency stop mechanisms.
6. The needle guards on 90% of the sewing machines had been pushed upwards by sewing machine operators, rendering them ineffective.
7. Workers from the sewing and checking sections are not provided with hand gloves to prevent the fabric dye from sticking to their hands and finger nails. Dye stuck to finger nails and hands could be a health hazard as workers eat food using their hands.
8. Safety shoes are not provided to machine mechanics to prevent accidental injury by sharp tools.
9. Workers from the washing department are not provided with fully protected shoes. The half shoes they were provided are not adequate to protect the exposed skin on workers' feet from water containing chemicals that could spill while loading and unloading garments from washing machines. Furthermore, approximately 40% of the workers in the washing department, including the hydro wash section, were wearing slippers instead of the half shoes they were provided. This exposes the skin on their feet to water and chemicals.
10. Approximately 30% of workers from the hydro wash section were wearing hand gloves on one hand instead of wearing them on both hands.
11. Workers from the washing section are not provided aprons to protect their clothes from getting wet while working. Some workers had tied a piece of polythene around their waist to protect themselves from getting wet.
12. All seven workers in the PP spray section had placed their eye shields (eye glasses) on their heads instead of using them while spraying.
13. Workers applying color along stitch lines of garments were not provided hand gloves.
14. Workers from the fusing section have been provided cloth gloves that cover their hand and two fingers. These gloves do not cover the three fingers (thumb, index, and middle) used to hold a garment, which poses a burn risk for these fingers while operating the fusing machines.
15. Approximately 10% of workers from the blow out section were not using ear plugs, and approximately 15% were not using eye shields

(both were provided).

16. Heat is generated in the fusing section and work stations are located adjacent to each other with inadequate ventilation.

17. Workers loading stones into the washing machines for stone wash were not provided any hand gloves.

18. Metal rivets from the rivet attaching machines were seen stuck in the floor mats posing a risk of injury to workers who might accidentally step on the rivets.

Local Law or Code Requirement

Bangladesh Factories Rules 1979, Rules 40, 41, 42, 43, 44 and 46; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.7, HSE.8, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. Ensure safety doors and shutter doors installed in front of lifts are operational. Lifts should not be operated while doors are left open.

2. Post load capacity of lifts outside the lifts and on mechanical lifters and hydraulic stackers used in the fabric store. These postings should be in local language (Bangla).

3. Post the intended use of the lifts outside the passenger lift and the two cargo lifts.

4. Display safety instructions near machinery. These should be in local language.

5. Install an emergency stop mechanism on all hydro machines used in washing section.

6. Train sewing workers on the proper use of needle guards and monitor compliance to ensure that needle guards are maintained in place.

7. Provide gloves to workers from the sewing and checking sections to prevent fabric dye from sticking to their hands and finger nails.

8. Provide safety shoes to machine mechanics to prevent injury.

9. Provide full-coverage shoes to workers from the washing section. Furthermore, do not permit workers from the washing section to wear slippers. Train workers on the importance of wearing full-coverage shoes and monitor to ensure compliance.

10. Train workers from the washing section on the proper use of gloves and monitor to ensure compliance.

11. Provide water proof aprons for use by workers from washing section to protect their clothes from getting wet while working.

12. Train workers in the PP spray section on the proper use of eye shields. Monitor to ensure compliance.

13. Provide hand gloves to workers applying color along the stitch lines of garments.

14. Provide full gloves to workers from fusing section to protect all fingers from burn injuries while operating the fusing machines.

15. Train workers from the blow out section on the proper use of ear plugs and eye shields. Monitor to ensure compliance.

16. Improve ventilation in the fusing section.

17. Provide hand gloves to workers who load stones into the washing machines. Train workers on the proper use of gloves and monitor to ensure compliance.

18. Make appropriate arrangements to prevent metal rivets from the rivet attaching machines from falling on floor mats.

COMPANY ACTION PLANS

1. 8. We will provide the safety shoes to machine mechanics to prevent accidental injury by sharp tools.

Planned Completion Date

05/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 9. We will provide the fully protect shoes to the workers of washing department. We will also ensure that all risks which may cause any hazard to workers are defined with the all needed actions for all sections including washing department. We will follow the process continuously.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 14. We will provide the proper hand gloves to the fusing section workers to avoid any kinds of burn risk.

Planned Completion Date

04/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 18. We will take necessary safety measures to avoid any kinds of injury from metal rivets.

Planned Completion Date

05/10/17

Action plan status: Scheduled

Planned completion date: 05/20/17

5. 6. We are organizing awareness program for workers to use needle guard properly for their personal safety.

Planned Completion Date

03/10/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that some of the sewing machine does not have the needle guard on the top of ineffectiveness.

6. 12. We are organizing awareness program for workers of PP spray section and ensured that they are using the eye shields (eye glasses) while spraying.

Planned Completion Date

03/12/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Worker are having inappropriate very low graded eye glasses

7. 15. We are organizing awareness program for workers to use PPE properly cause of own safety.

Planned Completion Date

03/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is trying to motivate the worker by training and on job instruction so that they could use.

8. 16. we have installed exhaust fan to reduce heat from fusing section.

Planned Completion Date

04/05/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory is required to have the exhaust system.

9. 17. We have provided hand gloves to the workers those who loading the stone into the washing machine.

Planned Completion Date

04/10/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted worker are using unnecessary type of PPE which is not required rather than PPE as per manual.

10. 1. We have installed safety fence in front of the cargo elevator. We will conduct comprehensive risk assessment including all elevator based risks and actions will be taken accordingly.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory installed safety fence in front of cargo elevator

Completion date: 03/15/17

11. 2. We have posted load capacity sign outside of the elevators. We have also marked load capacity on the mechanical lifters / hydraulic stackers used in the fabric storage room.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that Load capacity has been mentioned to required machine and area.

Completion date: 03/30/17

12. 3. We have posted the indicating signs whether the elevators are intended for use by passengers and/or cargo marked outside the passenger elevator and two cargo elevators situated near the accessories storage room (north side) and the finishing department (west side).

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory posted the indicating sign from outside.

Completion date: 03/10/17

13. We have posted Safety instructions near machinery.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory posted the safety instruction.

Completion date: 03/12/17

14. 5. We have installed emergency stop mechanism and sensor in all eight hydro machines in the washing section.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory management installed additional device for emergency stop mechanism.

Completion date: 03/15/17

15. 7. We have provided hand gloves to the sewing and checking section workers to prevent the fabric dye from sticking to their hands and finger nails.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory provided hand gloves to prevent fabric dye.

Completion date: 03/03/17

16. 10. We have provided necessary hand gloves and ensured that all workers of hydro wash section are wearing hand gloves on both hand while working.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Worker are wearing PPE both hand

Completion date: 03/05/17

17. 11. We have provided aprons to the workers of washing section to protect their clothes from getting wet while working.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Worker provided the appropriate aprons.

Completion date: 03/16/17

18. 13. we have provided hand gloves to the workers applying color along stitch lines of garments.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory has given the hand gloves.

Completion date: 03/12/17

FINDING NO.17

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. All chemical containers are labelled with the contents, but some containers of hazardous chemicals (chemicals used in the power generator, the effluent treatment plant, and in the washing process) are missing hazard labels.
2. All chemical containers (hazardous and non-hazardous) are stored in barrels kept on the floor in tiled compartments (individual blocks) in the chemical storage room located in the washing section. Each of these compartments has a drain hole on the floor to allow chemical leaks to flow into a common drain which leads to the effluent treatment plant. This practice allows the mixture of chemicals which may react when they come in contact with each other. Additionally this practice does not take in to consideration chemicals that may not be suitable for discharge to the treatment plant. Furthermore these compartments are not large enough to contain a large spill from the containers.
3. Hazardous chemicals (acids) are stored adjacent to non-hazardous chemicals (e.g. Legafinish Mar) in the chemical storage area.
4. The small containers of washing chemicals stored behind the washing machines are missing lids.
5. Assessors observed bags of ferrous sulphate stored in the open near the effluent treatment plant. Access was not restricted.
6. There is no chemical emergency alarm system installed in the chemical storage area.
7. Currently, female workers are employed in the printing section and PP spray area. These women are not informed that this work poses a risk to their reproductive health. As stated by management, if a female worker reports that she is pregnant or breastfeeding, she is assigned a separate job away from the chemical use areas.
8. The factory provides cloth gloves to workers who spray PP. This is not the appropriate PPE. Workers should be provided gloves made of latex or another non-porous material that prevents chemicals from coming in to contact with skin.

Local Law or Code Requirement

Bangladesh Factory Rules 1979, Rule 42; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.9, and HSE.12)

Recommendations for Immediate Action

1. Post hazard labels on all hazardous chemical containers.
2. Make appropriate arrangements to prevent mixture of leaked chemicals (from chemical storage area) that flows into the common drainage leading to the effluent treatment plant.
3. Move the Hazardous chemicals (acids) away from the non-hazardous chemicals (e.g Legafinish Mar).
4. Install lids on chemical containers containing chemicals stored behind washing machines.
5. Do not store ferrous sulphate in the open. Store ferrous sulphate in a chemical storage area with restricted access.
6. Install a chemical emergency alarm system in the chemical storage area.
7. Inform women who work in the printing and PP spray areas of the potential risk to their reproductive health. Allow any female workers who wish to work in a different department to transfer.
8. Provide workers who spray PP with gloves made of latex or another non-porous material.

COMPANY ACTION PLANS

1. 2. We will follow the proper chemical management system to ensure the safety in case of spill from the chemicals containers at chemical stores area. We will also ensure that all risks which may cause any hazard to workers are defined with the all needed actions for all sections including chemical used department. We will follow the process continuously.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 6. We will install chemical emergency alarm system in the chemical storage area.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 8. We will provide appropriate PPE to the concern workers working in the PP spray section.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 3. We have properly segregated the Hazardous chemicals (acids) from non-hazardous chemicals (e.g. Legafinish Mar) in the chemical storage area.

Planned Completion Date

12/31/16

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : In the chemical store no separation between hazardous and non-hazardous chemicals.

5. 7. We have aware the concern workers regarding the risk to their reproductive health. In addition we are also trying not to engage female workers in any hazardous workplace.

Planned Completion Date

03/01/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory revised the JD for pregnant worker and changed the area in printing and PP spray area.

6. 1. We have provided hazardous labels in the containers of hazardous chemicals kept at mentioned areas.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : In the ETP the chemical label was there.

Completion date: 04/02/17

7. 4. We have ensured the lids for the containers of washing chemical stored behind the washing machines.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory provided lids.

Completion date: 03/01/17

8. 5. We have stored ferrous sulphate properly and access also restricted

Planned Completion Date
03/05/17

Action plan status: Completed
Planned completion date: 05/20/17
Progress update: 12/08/17 : Factory provided separate area for ferrous sulphate
Completion date: 03/05/17

FINDING NO.18

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Assessors observed lint accumulated on electrical installations (emergency lights, tube lights, carriage trays, and cables) and on the steam pipes in all work areas in the factory and in the trench carrying electrical cables near the power generators.
2. Warning signs are not posted near the underground water tanks or the floor openings for the underground drainage system in the washing section.
3. The underground water tanks in the effluent treatment plant have protective covers made of iron rods welded to a metal frame. Workers use these covers as walkways when moving about the effluent treatment plant. This poses a significant fall risk, as the joints on these covers (where the rods meet the metal frame) are rusted and could give away. There is no procedure for the periodic inspection of these covers.
4. The factory has not implemented a lockout/tagout program by locking out equipment when needed.
5. There is no rescue equipment available for use by workers entering confined spaces (six underground water tanks).
6. Maintenance workers were observed working at heights without using fall protection equipment as they have not been provided the necessary PPE such as helmets or safety ropes.
7. A worker was seen sitting on a low and unstable makeshift stool while cleaning the drain filter gate through which water from the washing section flows into the effluent treatment plant. He was bending over the drain while cleaning, but no protection was provided to prevent head injury in case of an accidental fall and no eye shield was provided to protect the worker's eyes from accidental spills. He was later seen standing and bending towards the drain, increasing the risk of accidental fall.
8. There is no hand rail or closed cage on the ladder which is used to work at heights.
9. The door of an electric switch board attached to one washing machine was damaged and partly open in the washing section, posing a risk of electrocution.

Local Law or Code Requirement

Bangladesh Factory Rules 1979, Rule 42; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.7, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. Regularly clean all electrical installations (emergency lights, tube lights, carriage trays, cables), steam pipes, and the trench carrying electrical cables near the power generators. Monitor periodically to avoid accumulation of lint.
2. Post warning signs near the underground water tanks and floor openings for the underground drainage system in the washing section.
3. Replace rusted covers on walkways in the effluent treatment plant. Establish and implement procedures for the periodic inspection of these covers.
4. Implement lockout/tag out program by locking out equipment when needed.
5. Provide rescue equipment for use by employees entering confined spaces.
6. Provide fall protection equipment (helmets and safety ropes) to workers who work at heights. Train workers on the proper use of this equipment and monitor to ensure compliance.
7. Provide safety equipment such as a helmet, safety ropes, and eye shield to the worker who cleans the filter gate. Train the worker on the proper use of this equipment and monitor to ensure compliance.
8. Install hand rails and closed cages on ladders used to work at heights.
9. Repair or replace the damaged switch board door. Ensure that switch board doors are kept closed.

COMPANY ACTION PLANS

1. 2. We will post the warning signs near the underground water tanks or the floor openings for the underground drainage system in the washing section.

Planned Completion Date
08/30/17

Action plan status: Scheduled
Planned completion date: 05/20/17

2. 3. We will introduce proper procedure for periodic inspection of these covers.

Planned Completion Date

05/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 5. We will ensure necessary rescue equipment for use by workers entering confined spaces (six underground water tanks).

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 1. We have cleaned the lint from electrical installations (emergency lights, tube lights, Carriage trays, And cables) and on the steam pipes in all work areas in the factory. We will check the emergency lights, tube lights, carriage trays, and cables on regularly to ensure that they are lint free.

Planned Completion Date

03/10/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that factory is in progress to finish the issue.

5. 7. We have provided necessary PPE to the workers those who working for cleaning the drain. We will also ensure that all risks which may cause any hazard to workers are defined with the all needed actions for all sections including washing department. We will follow the process continuously.

Planned Completion Date

03/31/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : It was noted that there was no precaution for falling to drain.

6. 8. We have ensured closed cage on the ladder which is used to work at heights.

Planned Completion Date

03/30/17

Action plan status: In progress

Planned completion date: 05/20/17

Progress update: 12/08/17 : There was no handrail on the ladder

7. 4. We have implemented a lockout/tagout program by locking out equipment when needed.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Factory already implemented lockout program

Completion date: 03/01/17

8. 6. We aware the maintenance workers to use fall protection equipment's while working at heights. We have also provided necessary PPE to such as helmets to the maintenance workers. We will conduct comprehensive risk assessment including fall risks and actions will be taken accordingly.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Maintenance workers wokring by using required safety gears.

Completion date: 03/31/17

9. 9. We have repaired the door of the electrical switch board at washing section. We will conduct comprehensive risk assessment including electrical risks and actions will be taken accordingly.

Action plan status: Completed

Planned completion date: 05/20/17

Progress update: 12/08/17 : Electric switch board repaired

Completion date: 03/30/17

FINDING NO.19

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The markings indicating vehicle parking spots are faded. Sidewalks for pedestrian traffic are not marked.
2. The factory does not provide any visual management such as indicators, convex mirrors in dead ends, reflectors, etc. to ensure safe driving practices on factory premises.
3. Anti-fatigue mats are not provided to workers with standing jobs, except for workers in the ironing section.
4. Adjustable chairs with back rests are not provided to workers with sitting jobs. Wooden stools are provided.
5. The sewing machines stations are adjustable in height; however, other work stations such as those in the checking section, blow out sections, scrapping section, and ironing section are not adjustable in height. A few workers in each of these sections were bending down to do their jobs. This could cause bodily injury. Workers with standing jobs in the blow out section were seen resting on the low work stations behind them to support their lower backs.
6. Lifting belts are not provided to loaders. Loaders were seen lifting scrap bundles on their heads with no appropriate arrangement to prevent bodily injury.
7. The factory has not conducted a pre-employment medical exam for the two food servers serving snacks.
8. Food servers were not using the hand gloves, hair nets, and masks they were provided.
9. Cakes being sold in the canteen re not covered with nets and are thus exposed to flies.
10. The factory has not conducted a pre-employment medical exam for two of the three child care attendants.
11. The first aid kit near the chemical storage area are empty except for two bandages.

Local Law or Code Requirement

Bangladesh Factory Rules 1979, Rule 42; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.17, HSE.19, and HSE.22)

Recommendations for Immediate Action

1. Remark vehicle parking spots and mark sidewalks.
2. Provide visual management such as indicators, convex mirrors in blind ends and reflectors to ensure safe driving practices on factory premises.
3. Provide lifting belts to loaders to prevent bodily injury. Train workers on their proper use. Monitor to ensure compliance.
4. Conduct medical exams for the food servers serving snacks in the canteen.
5. Ensure that food servers use hand gloves, hair nets, and masks.
6. Provide nets to cover the snacks being sold in the canteen.
7. Conduct medical exams all child care attendants.
8. Stock the first aid kit near chemical storage area with adequate supplies. Regularly check and restock first aid kits.

COMPANY ACTION PLANS

1. 3. We will provide anti-fatigue mats to the workers with standing jobs, except for workers in the ironing section.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 5. We will ensure that all work stations are adjustable in height so that workers are not needed to bend down to do their job. We will conduct comprehensive risk assessment including ergonomic risks and actions will be taken accordingly. We will follow the process continuously.

Planned Completion Date

12/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 6. We will provide lifting belts to the loaders.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 7. We will conduct a pre-employment medical exam for the two food servers service snacks.

Planned Completion Date

05/31/17

Action plan status: Scheduled

Planned completion date: 05/20/17

5. 1. We have remarked the vehicle parking spots. We have also marked the sidewalks for pedestrian traffic.

Planned Completion Date
03/30/17

Action plan status: In progress
Planned completion date: 05/20/17
Progress update: 12/08/17 : Marking indicating vehical is still padded and not marked.

6. 2. We are maintaining the safe driving practice on factory premises through security guard as they strictly controlled the vehicle movement from or outside of the factory.

Planned Completion Date
12/31/16

Action plan status: In progress
Planned completion date: 05/20/17
Progress update: 12/08/17 : The issue is remain same.

7. 4. We have started to provide adjustable chairs with back rest to workers with sitting jobs.

Planned Completion Date
12/31/17

Action plan status: In progress
Planned completion date: 05/20/17
Progress update: 12/08/17 : Factory already started to implement the back rest chair but type of chair is inappropriate.

8. 8. we have already provided hand gloves , hair nets, and masks to the food servers.

Action plan status: Completed
Planned completion date: 05/20/17
Progress update: 12/08/17 : Food server are using required PPE
Completion date: 03/20/17

9. 9. Covered with nets has provided to cover the cakes & others food.

Action plan status: Completed
Planned completion date: 05/20/17
Progress update: 12/08/17 : The food items are covered by net
Completion date: 03/20/17

10. 10. We have conducted a pre-employment medical exam for all child care attendants.

Action plan status: Completed
Planned completion date: 05/20/17
Progress update: 12/08/17 : The child care taker got the medical exam.
Completion date: 12/22/16

11. 11. We have provided necessary first aid equipment's in the first aid kit near the chemical storage area. We will check the first aid box on regular basis.

Action plan status: Completed
Planned completion date: 05/20/17
Progress update: 12/08/17 : The first aid box are having kits beside chechemical store.
Completion date: 03/10/17

FINDING NO.20

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The Health & Safety procedures only cover fire emergencies, first aid, drinking water, health & hygiene, waste disposal, and PPE.
2. The last risk assessment conducted was dated June 20, 2016 and defines the work areas where chemicals are used, possible sources of risk, risk level, and risk prevention through the provision of PPE. The assessment does not provide any information on the risk grading scale, the number of workers present in chemical usage and storage areas, the probability, frequency, or severity of injury, or the appropriate administrative and engineering procedures to control risk.
3. The covers over the underground tanks in the effluent treatment plant and the washing section drainage system are not inspected periodically or included in factory risk assessments.

4. The factory does not have any guidance documents for external contractors/service providers concerning health and safety.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmark HSE.5)

COMPANY ACTION PLANS

1. 1. We will review & revise the Health & Safety procedures by including all required areas.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

2. 2. We will conduct proper risk assessment covering all required points as advised.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

3. 3. The covers over the underground tanks in the effluent treatment plant and the washing section drainage system will inspect periodically and report will be maintained.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17

4. 4. We will prepare necessary guidance documents for external contractors/service providers concerning health and safety.

Planned Completion Date

06/30/17

Action plan status: Scheduled

Planned completion date: 05/20/17