COMPANIES: Gildan Activewear Inc
COUNTRY: Bangladesh
ASSESSMENT DATE: 10/22/16
ASSESSOR: FLA EMEA
PRODUCTS: Apparel
NUMBER OF WORKERS: 1989

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

Findings and Action Plans

FINDING NO.1

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Some repeater panels within the factory are on pre-alarm mode, which indicates that the fire alarm system does not work properly.
2. Some electrical panels in the factory have overheated (73 to 89.5 degrees Celsius) and require maintenance.
3. In the main natural gas inlet room, the cover on the fire detector has not been removed, rendering the detector non-operational.
4. It is not clear if the battery capacity of the fire alarm panel can provide standby power for a five-minute alarm for at least 24 hours.
5. During the assessment, a vehicle was parked in the emergency assembly area in front of the building.
6. The main discharge valve of the fire pump is not locked in the open position.
7. The number of FSCD trained and certified firefighters is not line with local law requirements. The factory has 120 trained and certified firefighters; by law there must be 512 FSCD trained and certified firefighters for the number of workers at the factory.
8. In the stain removing section and warehouse, the exhaust for some cabinets of flammable chemicals is not properly connected to the outside.
9. The electrical motors in the compressor room vibrate and overheat, posing a fire risk.
10. The government-issued fire license does not include the newly added five-story production building, two-story utility building, or the four containers used as storage outside.
11. The factory management has not obtained approval of the floor layout for the five-story production building from the local authority (Chief Inspectorate Office of the Factories).
12. One fire extinguisher in the fabric storage area is not hung in its permanent location.

Local Law or Code Requirement

Fire Service & Civil Defense Act 2003, Section, 4(1); Building Construction Act 1952, Section-3(1), Bangladesh Labor Rule section 55, FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.4, HSE.5, HSE.6, HSE.9, and HSE.13)

Root Causes

1. The internal fire risk assessment is very basic and does not include all risks or how to eliminate and/or manage those risks.
2. The factory is in the process of installing the fire alarm and detection system, and therefore such issues and violations will naturally be observed.
3. Overheated panels are due to a lack of maintenance, loose connections, unbalanced load distribution and the use of the wrong wire diameter.
4. The factory does not undergo periodic thermal imaging efforts to identify overheating in panels, electrical motors, wirings, and other electrical appliances.
5. It is challenging for factories to meet the minimum requirement (18%) of FSCD trained and certified workers due to the cost of training and certification, ongoing production work, and worker turnover rate.
6. The management was not aware of the requirement to include containers as part of the fire license, as these containers are not a physical part of the factory building and are located outside.
7. Since the five-story factory building is new and some construction is ongoing, management has not yet applied for either the fire license or the floor layout plan.
8. Although there is an Environment, Health & Safety (EHS) committee in place, there are only two worker representatives on a committee of ten (the remaining are managers and supervisors).
9. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – both fire and Health & Safety, internal audits, Personal Protective Equipment (PPE) selection, policy and procedure development and review.
10. The factory does not provide specific training to EHS committee members.
11. The EHS committee only meets once every two months, which is not enough to deal with EHS issues for an integrated factory with almost 3,000 workers.
12. Most of these issues have not been identified during internal or external audits.

Recommendations for Immediate Action

1. Carry out necessary maintenance and tests to ensure fire alarm panel and repeater panels are in good working condition.
2. Identify and maintain electrical panels in the factory that have overheated.
3. Remove the cap from the fire detector in the main natural gas inlet room and ensure it is operational.
4. Calculate the power consumption of the alarm panel and repeater panels to ensure that the battery capacity of the fire alarm panel is enough to provide standby power for at least 24 hours and a five-minute alarm.
5. Prohibit the parking of vehicles in the emergency assembly areas in front of the building; post signs indicating such.
6. Lock the main discharge valve of the fire pump in the open position.
7. Prepare a plan to gradually increase the number of FSCD trained and certified workers in the factory.
8. Properly connect the exhaust of all flammable chemical cabinets to the outside.
9. Maintain all electrical motors in the compressor room.
10. Include the newly added five-story production building, two-story utility building and four containers in the fire license.
11. Obtain approval of floor layout plan from the local authority (Chief Inspectorate Office of the Factories) for the new five-story production building.
12. Ensure that all fire extinguishers are hung in their permanent locations.

FLA's Recommendations for Sustainable Improvements

1. Provide a thermal camera to maintenance and EHS team and let them conduct weekly checks on the following: the electrical panels (especially panels in the compressor rooms, main electrical panels in each section, power generator room and panels with high load); the electrical wiring; the electrical motors and pumps; and the boilers and steam lines.
2. Review existing maintenance program within the factory and implement more predictive and preventive actions, rather than conventional maintenance activities such as: provide specific training to maintenance staff on predictive and preventive maintenance; use thermal imaging and ultrasonic measurements to identify potential issues before they occur; and follow the average life span of machines, infrastructure, and equipment and conduct inspections, lubrications, repairs or rebuilds based on known average life span.
3. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.
4. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
5. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
6. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
7. Review and revise existing fire risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. Completed: One faulty repeater panel was replaced with a new one at the end of October 2016. After this maintenance the alarm system is working properly in normal mode.

2. Completed: Electrical Panels are inspected weekly to provide on time maintenance. On December 2016 thermography inspection was performed to electrical panels.

3. Completed: The cover on the fire detector located at the main natural inlet room was removed.

4. In Progress

5. Completed: Emergency Assembly Area has been delimited using road dividers to prevent any vehicles blocking it.

6. In Progress: The factory is in a quotation process to replace the actual fire pump valve with a new one with suitable lock system.

7. In Progress: Factory has scheduled training sessions to certify total required number of employees. At present time a total of 200 employees have been certified by FSCD. Factory is expecting to complete training of 512 employees by the month of December 2017.

8. Completed: The exhausts, for flammable chemical cabinets, have been properly connected to the outside.

9. Completed: Maintenance was given to electrical motor at compressor room. Compressor temperature is within normal operation range.

10. Completed: Fire license for the five-story production building and the two-story utility building has been obtained.

11. Completed: Floor Layout Plan for the five-story production building has been approved by the local authority.

12. Completed: All fire extinguishers have been hanged in their permanent location at Fabric Storage area.
Planned Completion Date
12/31/17

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 4. Completed: The batteries were replaced with two brand new, that have the required specifications. Evidence uploaded in FLA's database. New Progress update 6. Completed: The fire pump is kept locked in the open position with a secure mechanism. The EHS department is in charge of the key of the fire pump valve. May 2019 Update: 7. Completed and Ongoing(November-15-2018): Facility now has a total of 624 workers trained and certified as Firefighters by FSCD, and will continue to train additional employees on 2019.
Completion date:	11/16/18

FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation
1. The lathe and grinding machines are missing machine guards.
2. One air tank was not bolted to it permanent position; this issue was fixed on the second day of the assessment.
3. The barrier on the walking platform of the effluent treatment plant (ETP) section are loose and need maintenance. Furthermore, part of the barrier at the end of the platform is missing.
4. The factory has not marked the manometers on the pressure vessels indicating working and maximum working pressure levels.
5. The safety vent on the air tank in the compressor room was missing; however, the factory provided it during the second day of the assessment.
6. The ladders in the textile section do not have handrails and pose a risk of falling.

Local Law or Code Requirement
FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.13 and HSE.14)

Root Causes
1. The mechanical workshop is located in a distant location on the compound and is therefore not visited during internal audits.
2. Ongoing construction work prevented the timely installation of barriers in the ETP.

3. The EHS committee is not involved with ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment, internal audits, PPE selection, and policy and procedure development and review.
4. The factory does not provide specific training to EHS committee members.
5. The EHS committee only meets once every two months, which is not enough to deal with EHS issues for an integrated factory with almost 3,000 workers.
6. Most of these issues have not been identified during internal or external audits
7. The factory has implemented a very basic internal job-based risk assessment; however, the report does not include either specific risk grading or preventive and corrective actions for the risks identified in the assessment.

Recommendations for Immediate Action
1. Provide proper machine guards for the lathe and grinding machines.
2. Provide all pressure vessels with functioning safety vents.
3. Fix all air tanks to their permanent positions.
4. Maintain the barrier on the walking platform of the ETP. Provide any missing barriers at the end of the platform.

FLA's Recommendations for Sustainable Improvements
1. Prepare and implement a regular procedure for checking safety vents of the pressure vessels.
2. Mark the working and maximum working pressure levels of the pressure vessels on manometers.
3. Install handrails on the ladders in the textile section.
4. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.
5. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of this assessment results and deliver these trainings.
6. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with the risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
7. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
8. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. Completed: Missing machine guards have been installed.

2. Completed: Air tanked bolted to permanent position.

3. Completed: Repaired and installed missing barriers on walking platform at ETP.

4. In Progress.

5. Completed: Safety vent installed to air tank at Compressor Room.

6. Completed: Handrails installed to all ladders at Textile section.

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 4. In Progress: The factory is searching with local suppliers for the required manometer that has the working and maximum working pressure levels. New Progress update 4. Completed: New manometers, that show working and maximum working pressure levels, were installed in all pressure vessel.
Completion date:	10/26/17

FINDING NO.3

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation
1. The MSDS of the Fevicol Super FS203 is missing. Five MSDSs only had six out of the 16 sections, as per international standards. Finally, two MSDSs are only in English, and not in the local language.
2. The factory has not provided the correct PPE for the chemicals, as prescribed by the MSDSs.
3. The factory has not conducted a Volatile Organic Compound (VOC) measurement within the chemical use areas.

4. Three chemical containers in the stain removing section are unlabeled.
5. The factory has not properly installed the vacuum system in the stain removing section, and therefore the exhaust blows into the production areas rather than outside.
6. Although most of the PPE has international quality certification marks, the protective goggles in the stain removing section do not.
7. About 60% of workers do not wear their respirators correctly, as they are not properly fitted, and therefore the respirators do not retain their seal. The factory does not train workers on how to fit their respirators properly.
8. The factory does not have a system in place to identify and replace hazardous chemicals with less hazardous alternatives.

Local Law or Code Requirement
FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.9, HSE.10, and HSE.13)

Root Causes
1. Although there is a master list in place for the chemicals in use, this list is incomplete does not include all chemicals in use at the moment. Furthermore, the list does not include the ingredient information.
2. The EHS committee has not been involved with ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment, internal audits, PPE selection, and policy and procedure development and review.
3. The factory does not provide specific training to EHS committee members.
4. The EHS committee only meets once every two months, which is not enough for dealing with EHS issues for an integrated factory with almost 3,000 workers.
5. Most of these issues have not been identified during internal or external audits.
6. The factory has implemented a very basic internal job-based risk assessment; however, the report does not include either specific risk grading or preventive and corrective actions for the risks identified in the assessment.

Recommendations for Immediate Action
1. Make all MSDSs for all chemicals in use, available in the local language in areas where the chemicals are stored and used.
2. Ensure the MSDSs are in line with international standards and include all 16 sections, which are as follows: (i) chemical product and company identification; (ii) hazard(s) identification; (iii) composition/information on ingredients; (iv) first-aid measures; (v) firefighting measures; (vi) accidental release measures; (vii) handling and storage; (viii) exposure controls/personal protection; (ix) physical and chemical properties; (x) stability and reactivity; (xi) toxicological information; (xii) ecological information; (xiii) disposal considerations; (xiv) transport information; (xv) regulatory information; and (xvi) other information.
3. Provide PPE in the chemical use areas that is in line with the MSDSs and therefore provides adequate protection from risks associated with chemicals.
4. Ensure that all PPE in use have the international quality certification marks.
5. Properly label all chemical containers.
6. Repair the vacuum system in the stain removing section to ensure it is in good working condition.
7. Conduct annual VOC measurements in the chemical use areas.
8. Ensure that workers are using their respirators properly and conduct fit testing while they are putting on respirators each time.

FLA's Recommendations for Sustainable Improvements
1. Implement a system to replace hazardous chemicals with less hazardous alternatives.
2. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.
3. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
4. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with Risk Assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
5. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
6. Review and revise existing fire risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. Completed: Factory is no longer using product "Favicon Super FS203". All MSDSs have been translated to local language.

   2. Completed: PPE has been provided as prescribed in MSDSs, Also awareness training on chemical handling and PPE use has been given to all employees that work with chemical products.

   3. In Progress: Annual VOC measurements will be completed in the following months. Attached copy of purchase order to external company that will be performing the measurements at chemical use areas.

   4. Completed: All chemical containers have been properly labelled.

   5. Completed: Vacuum system has been properly installed at stain removing section.

   6. Completed: Factory has purchased and provided protective goggles with international quality certification to all employees

handling chemical products.

7. Completed: Awareness training on chemical handling and PPE use has been given to all employees that work with chemical products.

8. Completed: Environmental Code of Practice (ECP) Training has been given to employees that handle chemical products.

Planned Completion Date
12/31/17

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	07/28/17 : 1. Factory is taking the necessary steps to strengthen the current chemical management system. May 2019 Update: 3. Completed and Ongoing (June-19-2018): Yearly VOC measurements are being done at the facility. The VOC results indicate that working areas are within internationally acceptable parameters. Calibration Certificate of measurement device and Training Certificate of individual that performed the VOC measurement are included.
Completion date:	06/20/18

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation
1. There is not grounding connection on some sockets in production areas and outside (e.g., the mechanical workshop), and therefore the sockets are not properly grounded.
2. The grounding connection for some sockets in the production buildings, indicated by high grounding readings, is of poor grounding quality.
3. The grounding measurement report does not include any measurements from sockets or machinery locations
4. The factory uses two-pronged plugs with some three-pronged sockets; and therefore there is no grounding protection.
5. The factory has not installed residual current devices (RCD) on the electrical panels.
6. The factory does not immediately remove equipment with electrical problems from service.

Local Law or Code Requirement
FLA Workplace Code (Health, Safety & Environment Benchmark HSE.13)

Root Causes
1. The factory does not have a handheld multifunction electrical testing equipment for both the maintenance and the EHS team to use.
2. RCD protection is not a legal requirement in Bangladesh.
3. The EHS committee is not involved with ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment, internal audits, PPE selection, and policy and procedure development and review.
4. The factory does not provide specific training to EHS committee members.
5. The EHS committee only meets once every two months, which is not enough to deal with EHS issues for an integrated factory with almost 3,000 workers
6. Most of these issues have not been identified during internal or external audits.
7. The factory has implemented a very basic internal job-based risk assessment; however, the report does not include either specific risk grading or preventive and corrective actions for the risks identified in the assessment.

Recommendations for Immediate Action
1. Check and maintain the electrical sockets in the production areas and outside.
2. Include measurements from the sockets and machinery locations in the grounding measurement report.
3. Cease the use of two-pronged plugs in three-pronged sockets.

FLA's Recommendations for Sustainable Improvements
1. Buy a multifunction electrical test equipment to conduct loop, RCD, voltage drop, and insulation resistance tests within the factory.
2. Create a plan to install RCDs on the electrical panels, starting with 300mA RCDs for fire protection on the main panels and 30mA RCDs on the distribution panels for personal protection against electrical shocks.
3. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.

4. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
5. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with Risk Assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
6. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
7. Review and revise existing fire risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. Completed: All electrical sockets have been provided with grounding connections.

2. Completed: Factory installed necessary earthing pits to improve grounding quality.

3. Completed: Grounding report has been done in 2017 by external company.

4. Completed: All two-pronged plugs have been replaced with three-pronged plugs.

5. In Progress: Factory is in quotation process of RCD Devices.

6. Completed: Defective equipment has been fixed or removed. Factory follows-up with weekly checks of machines to provide on time maintenance as needed.
Planned Completion Date
12/31/17

Action plan status:	Scheduled
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 3. Factory is in the process of quotation to conduct grounding reports that include all sockets and machinery. New Progress update 3. Completed: Ground Resistance Testing Report has been done for 2018, all outlets are within range.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation
1. Oil-contaminated water from the air compressor, the air tank and dryers discharges directly onto the ground outside.
2. The condensing boilers discharge hot condensed water vapor (hotter than 70 degrees Celsius) directly onto the ground outside.
3. Construction workers built a prefabricated toilet outside of the factory. Wastewater from this toilet discharges directly into the river and is not connected to the ETP.
4. The factory does not properly keep records on sludge emitted from the ETP and existing documentation does not include specifics about delivery, such as the date, amount, or signature of the recipient.
5. The factory stores some empty chemical barrels and containers as well as solid waste outside.
6. The solid waste – fabric, carton, and nylon – in the solid waste storage area is not properly separated.
7. The factory does not have permits from the energy regulatory commission to operate either of its two gas generators (2.134 MW) or one diesel generator (1 MW). The factory applied for the permission for the two gas generators from the commission on October 18, 2016; the permission has not yet been received. The factory has not yet, however, applied for an operating permit for the diesel generator.
8. The factory uses ozone-depleting refrigerant (R22) in the air conditioning system.
9. Compressed air leaks from the machines and air lines in different sections of the production areas, such as the stain removing area and sewing section.
10. There is solid waste and construction waste scattered around the building.
11. The contractor left a gas canister outside.
12. From April to June 2016, the factory did not keep records on the movement of the following waste: cooking oil and machine oil waste; electrical waste, including light bulbs; battery and lubricant waste; and glass, PET and wood waste.

Local Law or Code Requirement
Bangladesh Energy Regulatory Commission Act 2003, Section-27(1); FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmarks HSE.1, HSE.4, and HSE.9)

Root Causes

1. The internal audits do not focus on Environmental Protection. As a result, there are not any Environmental Protection violations in the internal audit reports.
2. The factory does not conduct an environmental risk assessment.
3. The factory does not provide any specific training on Environmental Protection to workers or managerial staff, nor has it conducted a training-needs assessment.
4. Although some written documentation on Environmental Protection exists (such as a waste control form and a wastewater analysis), the factory does not have any written procedures on Environmental Protection.
5. Last revision of the Environmental Policy was December 2006; there have not been any revisions since.
6. The EHS committee is not involved with issues relating to Environmental Protection; their scope of work is limited to Health & Safety.
7. The factory does not provide specific training to EHS committee members.

Recommendations for Immediate Action
1. Ensure that oil contaminated water from the air compressor, air tank, and dryer does not discharge directly outside and on the ground.
2. Ensure that condensation coming from the boilers does not discharge directly outside.
3. Remove the prefabricated toilet or connect it to the ETP.
4. Properly keep delivery records of sludge that comes out of ETP. Include specifics regarding delivery, such as the date, amount, and signature of the recipient.
5. Store empty chemical barrels and containers and solid waste in an appropriate storage area that is not located in outside. Collect, separate, and store the solid waste in the appropriate solid waste areas.

FLA's Recommendations for Sustainable Improvements
1. Provide an ultrasonic leak detector to the maintenance team to identify and maintain compressed air leaks in factory.
2. Collect solid waste and construction waste that is scattered around the factory and transfer it to designated solid waste areas.
3. Ensure monthly waste control forms are completed by authorized staff and controlled to ensure that all waste movements are properly recorded.
4. Obtain the generator set up permission from the energy regulatory commission for the two gas generators (2.134 MW) and one diesel generator (1 MW).
5. Create and implement a plan to phase-out the ozone depleting refrigerant in use in the air conditioning systems.
6. Closely monitor contractors to ensure that they follow the factory's rules on waste management and Environmental Protection
7. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
8. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with Risk Assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
9. Review and revise the existing internal audit tool to ensure that issues related to Environmental Protection are covered.
10. Conduct an environmental risk assessment to identify environmental risks in the factory and address such risks.

COMPANY ACTION PLANS

1. 1. In Progress: Factory is in the process of analyzing different options to fix this item.

2. In Progress: Factory is in the process of analyzing different options to fix this item.

3. Completed: Prefabricated toilet has been removed. Construction workers are allowed to use toilets inside the factory.

4. In Progress.

5. Completed: Factory has set a dedicated area to store empty chemical barrels and containers.

6. Completed: Factory has set a dedicated area to store solid waste properly separated.

7. In Progress: Factory has applied for the diesel generator license since March 2017. Awaiting approval from local authority.

8. In Progress: Factory is in the process of analyzing different options to fix this item.

9. Completed: Compressed air leaks have been fixed in the stain removing area and sewing section.

10. Completed: Construction waste was removed.

11. Completed: Gas canister is now kept secured in a area with rooftop.

12. Completed: Factory is keeping all records (control forms) of waste movements.
Planned Completion Date
12/31/17

Action plan status:	In progress
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 4. In Progress: Maintenance department is following up the proper use of the format the factory has implemented. New Progress update 1. Completed: All the Air Compressors, Air Dryers and the Air Tank are in a new utility building with pipe installation that is properly connected; discharging directly into the ETP for the water treatment process. 4. Completed: The factory implemented a special format to include all required information for ETP Sludge discharge records. May 2019 Update: 2.. Completed (July-15-2018): The facility finalized a complete refurbishing of the boilers' room. As part of this refurbishing, the facility installed a recovery condensate system, which is a closed loop system. Due to the system's characteristics, the facility will reduce the amount of water use, as well it will generate energy savings. 7..In Progress: Facility is waiting to receive the final visit from the Energy Regulatory Commission. 8..In Progress: Facility has been replacing some R22 air conditioners to R410 on a yearly basis and for any new purchase of air conditioning equipment the Purchasing Department will only buy equipment that works with R410 refrigerant which is ozone friendly.

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The total number of hours worked per week exceed 60 hours on several occasions. In October 2015, February 2016, June 2016, July 2016, August 2016, and September 2016, 60% of the workers sampled from the sewing and finishing sections had worked an average of 62 hours a week, with a maximum of 68 hours per week (including one weekly day of rest).
2. In several cases, the factory did not provide one day (24 consecutive hours) of rest for every seven-day period. During the months of October 2015, February 2016, June 2016, July 2016, August 2016, and September 2016, 60% of the workers sampled from the of sewing and finishing sections had not received one day of rest (24 consecutive hours) in a seven-day period . This resulted in 13 days of continuous work (from August 27, 2016 to September 8, 2016) without a break. The factory considers work on days of rest to be overtime and therefore gives workers a substitute day off. However, in four cases, factory did not provide the compensatory day off within three working days, the legally mandated time period.
3. The factory's current time keeping software does not allow pregnant or lactating workers to be identified in order to ensure any protections concerning working hours.
4. The factory does not provide workers who work during the festival holidays – 57 contracted security guards and 50 workers from the maintenance, boiler, ETP, and generator sections – with one extra day off, as required by local law.

Local Law or Code Requirement

Bangladesh Labor Act 2006, section-102 & 103; Bangladesh Labor Rule 2015, section 101; FLA Workplace Code (Employment Relationship Benchmark ER.22; Hours of Work Benchmarks HOW.1, HOW.2, HOW.5, HOW.8, HOW.11; Compensation Benchmark C.1)

Root Causes

1. Workers rely heavily on extra income that they generate with overtime work.
2. Most of these issues have not been identified during internal or external audits
3. The factory's overtime work hours are less than the industry average and therefore management did not think it was an issue.
4. The factory does not have a system in place to keep track of reasons overtime work is needed and conduct a detailed analysis in order to progressively reduce overtime work.
5. Since overtime work on festival holidays is limited to contractual workers and a very small group of factory workers, management has disregarded the requirement to give workers the extra day off.

Recommendations for Immediate Action

1. Provide workers with at least one day off (24 consecutive hours) for every seven-day period.
2. Provide workers who worked during the festival holidays the extra day off, as required by local law.

FLA's Recommendations for Sustainable Improvements

1. Implement a system to understand the cause of overtime work by collecting and analyzing the following data:
1. Planning related issues
2. Monthly non-productive time and its reasons
3. Monthly absenteeism and its impact on working hours
4. Monthly employee turnover rate
5. Rework rates and its impact on working hours

6. Second-quality rates and their impact on working hours
2. Provide the compensatory rest day within three working days, as legally mandated.
3. Improve performance incentive system to increase productivity and reduce the need for overtime work.
4. Pay more attention to festival holiday overtime work to ensure both contractual workers and factory workers are provided with extra day off.
5. Review internal audit methodology and tools to ensure that such issues are captured by internal auditors.

COMPANY ACTION PLANS

1. 1. Completed: Factory provided training to management team on working hours policy and labor law, also implemented follow-up of overtime worked in order to not exceed working hours limit.

2. In Progress: Factory is working closely to improve and comply with the three day time period to provide compensatory day-off.

3. Completed: Factory has implemented a system in the time keeping software with the capability to track pregnant or lactating workers to ensure working hours protection.

4. Completed: Factory provided one day off per each day an employee worked during EID holidays, as per law requirement. Also for contracted security workers factory requested the security company too provide them the compensatory days-off.

Planned Completion Date
12/31/17

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	07/28/17 : 2. In Progress: Facility has demonstrated improvement providing compensatory day off, and is working to achieve a sustainable practice to make sure that if the factory needs to do overtime work on a rest day, the substitution rest day will be provided in 3 days according to law. May 2019 Update: Completed and Ongoing (June-01-2018) Facility implemented a close follow-up to keep better control of work on Rest Days (Holidays) and assign a Compensatory Rest Day (Compensatory Holiday) within three working days, also Human Resources ensures to comply with Overtime Compensation Policy BAN-HHL-013. Working on a rest day will only be necessary for exceptional circumstances and it is requested to employees to come in a voluntary manner.
Completion date:	06/02/18

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation
The factory did not pay three days (six hours) of overtime payment from June 2016 to 226 sewing and finishing workers within seven working days after the last day of the wage period; payments were made two months later, in September 2016.

Local Law or Code Requirement
Bangladesh Labor Law 2006, Section-123(1); Bangladesh Labor Law 2006, section-118; FLA Workplace Code (Employment Relationship Benchmark ER.18; Compensation Benchmarks C.1 and C.4)

Root Causes
1. These issues have not been identified during internal or external audits.
2. The software and calculation issues within the software is the primary cause of late payments of overtime work.

FLA's Recommendations for Sustainable Improvements
1. Review internal audit methodology and tools to ensure that such issues are captured by internal auditors.
2. Review and make any necessary improvements to the relevant software to prevent the late payment of overtime premiums.

COMPANY ACTION PLANS

1. 1. In Progress: Factory is working closely to ensure the improvement of payroll system to prevent delays in the payment of

overtime hours.

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 1. In Progress: Factory continues working closely to ensure the improvement of payroll system to prevent delays in the payment of overtime hours. New Progress update 1. Completed: Human Resources and Payroll staff was trained to ensure overtime hours payments are made without any delays.
Completion date:	10/23/17

FINDING NO.8

NOTABLE FEATURE

FINDING TYPE: Compensation

Finding Explanation
The factory pays workers in the textile section based on the “garment worker wage scale” instead of the “textile worker wage scale”, which is the higher of the two wage scales.

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation
1. Although a majority of the new recruits within the previous 12 months were hired with a three-month probation period, 2% of the new recruits had probation periods that were longer than three months, a maximum as set by the FLA Code. Furthermore, the policy and procedures do not clearly limit the probation period to three months.
2. Although there were not any cases of discrimination observed, the job application form includes questions about personal information such as applicants’ nationality, religion, marital status, and number of children.
3. The factory’s procedures on Recruitment, Hiring & Personnel Development do not include guidance on special categories of workers.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmarks ER.3 and ER.14; Compensation Benchmark C.3)

Root Causes
1. Having more than three months of probation is in line with local law requirements.
2. The factory extended some workers’ probation period to give them a second chance rather than terminating their contract based on unsatisfactory performance.
3. The personal questions on the job application forms are mainly used for data collection and management did not think it was an issue.
4. These issues have not been identified during internal or external audits.

Recommendations for Immediate Action
Limit the probation period to three months, as per FLA Code requirements.

FLA’s Recommendations for Sustainable Improvements
1. Revise the job application form and remove all personal information about applicants such as nationality, religion, marital status, and number of children.
2. Revise recruitment procedure to clearly limit the probation period to three months.
3. Train the Human Resources staff on the revised recruitment procedure and job application form.
4. Review internal audit methodology and tools to ensure that such issues are captured by internal auditors.

COMPANY ACTION PLANS

1. 1. In Progress: Facility working to improve applicable documents.

2. In Progress: Facility working to improve applicable documents.

3. In Progress: Facility working to improve applicable documents.

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 1. Completed: Since last FLA's visit to the facility, all probation periods are limited to 3 months, according to local law. New Progress update 2. Completed: Job Application Form updated. 3. Completed: Talent Acquisition Policy and Procedure updated to include guidance on special categories of workers.
Completion date:	11/30/17

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation
1. The factory has not yet appointed the welfare officer, as legally required.
2. The Industrial Relations (Freedom of Association) policy is missing the definition of industrial actions.

Local Law or Code Requirement
Bangladesh Labor Rules 2015, Section 79, FLA Workplace Code (Employment Relationship Benchmark ER.1 and ER.26; Freedom of Association Benchmark FOA.1)

Root Causes
1. The factory has another position, by another name, currently filling in for the welfare officer position. Management believes that changing this person's title would be considered a demotion.
2. Since the factory has not experienced any industrial actions (e.g., a strike, work stoppage, slowdown), management did not think that was a need to define it in the policy.
3. These issues have not been identified during internal or external audits

Recommendations for Immediate Action
Appoint a welfare officer.

FLA's Recommendations for Sustainable Improvements
1. Since it is a legally defined position, it is important for management to make the necessary arrangements in the organizational structure and job description of this individual to create the position and have it function as per regulations, without incurring any demotions.
2. Revise and include industrial actions in the existing FOA policy.
3. Review internal audit methodology and tools to ensure that such issues can be captured by internal auditors.

COMPANY ACTION PLANS

1. 1. Completed: Welfare officer has been hired by the factory.

2. In Progress: Factory is working to improve Industrial Relations (Freedom of Association) policy.

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 2. In Progress: Factory continues working to improve Industrial Relations (Freedom of Association) policy. New Progress update 2. Completed: Industrial Actions definition has been included in the Industrial Relations Policy (BAN-HRL-004).
Completion date:	08/30/17

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation
There is no worker or union involvement in the development of policies and procedures for any of the Employment Functions.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmark ER.25)

Root Causes
1. The policies and procedures are prepared and updated by management as a general company practice.
2. Worker representatives have not received any training nor do they have any knowledge on the basics of policy and procedure development.
3. Management did not know of such a need as it is not a legal requirement.

FLA's Recommendations for Sustainable Improvements
1. Consult with company headquarters for a revision on existing policy and procedure development and the inclusion of worker representatives in this process.
2. Provide training to worker representatives and teach them basic concepts on policies and procedures like their definition, coverage and content, and regular review.

COMPANY ACTION PLANS

1. 1. In Progress: Factory involves "Participation Committeee" in making decisions related to employees welfare and well-being. Factory will follow-up with company headquarters to implement improvements.

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	07/28/17 : 1. In Progress: Factory is following-up with company headquarters to implement improvements. May 2019 Update: Completed (January-24-2018): Workers are being involved in the development of Human Resources policies and procedures, which are discussed with the Worker's Participation Committee (WPC) before final approval. All WPC members receive a yearly training on HR policies and procedures. Herewith included training record and meeting record of discussing a new written policy. WPC participation included in numeral 6.4.2 of "Procedure to Generate and Control of Documents and Records". Last election for WPC was in April 2018 with a two year validity as per Bangladesh Law.
Completion date:	01/25/18

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation
1. There is no worker or union involvement in the decision making process of disciplinary actions.
2. Disciplinary actions are not witnessed by a third party during their imposition or appeal.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmark ER.27)

Root Causes
1. These are not legal requirements so the factory management did not think it needed to be included in existing policy.
2. Although managerial staff knows the general FLA Code of Conduct, they are not familiar with the complete benchmark requirements.
3. These issues have not been identified during internal or external audits.

FLA's Recommendations for Sustainable Improvements
1. Revise the existing disciplinary procedure to include the following:
1. Third-party witness during the imposition and appeals of disciplinary actions
2. Involve union and elected worker representatives in the development of policy and procedure as well as the decision making process for disciplinary actions by forming a disciplinary committee where management and workers are equally represented. Ensure that the committee sanctions all disciplinary actions through a voting process. 2. Consult the FLA and organize joint training sessions for

managerial staff to raise awareness on the Code and its benchmarks.
3. Review the internal audit methodology and tools to ensure that such issues are captured by internal auditors.

COMPANY ACTION PLANS

1. 1. In Progress: Factory is in the process of revising disciplinary procedure.

   2. In Progress: Factory is in the process of revising disciplinary procedure.

   Planned Completion Date
   12/31/17

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	07/28/17 : 1. In Progress: Factory continues in the process of revising disciplinary procedure. 2. In Progress: Factory continues in the process of revising disciplinary procedure. May 2019 Update: Completed (December-20-2017) Facility updated the Disciplinary Policy BAN-HRL-003 including an Investigation Committee and third party witness in the process. It has been validated that this updated policy has been implemented and consistently applied per each case.
Completion date:	12/20/17

FINDING NO.13

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation
The factory does not have any written policy or procedures on Retrenchment.

Local Law or Code Requirement
FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.32)

Root Causes
1. Since the factory has not experienced any cases of retrenchment and the business is well-structured and growing, they did not think a retrenchment procedure was needed.
2. Although managerial staff knows the general FLA Code of Conduct, they are not familiar with the complete benchmark requirements.
3. These issues have not been identified during internal or external audits.

FLA's Recommendations for Sustainable Improvements
1. Prepare a written policy and procedure on Retrenchment.
2. Consult the FLA and organize joint training sessions for managerial staff to raise awareness on the Code and its benchmarks.
3. Review the internal audit methodology and tools to ensure that such issues are captured by internal auditors.

COMPANY ACTION PLANS

1. Factory is working in the creation of retrenchment policy.

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	Previous Progress Update 07/28/17 : 1. In Progress: Factory continues working in the creation of retrenchment policy. New Progress update 1. Completed: The factory has a written Retrechment Policy available.
Completion date:	08/03/17

FINDING NO.14

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There is not a system in place to keep food samples for at least 72 hours after serving.
2. Some drinking water dispensers are exposed to direct sunlight. Furthermore, there are no records of the dispensers being cleaned and sanitized periodically.
3. Although there is a defined limit for manual handling and a procedure in place for manual lifting, most workers do not follow this procedure and carry boxes and fabric on top of their head.
4. The factory does not provide any anti-fatigue mats to approximately 10% of standing workers. Approximately 10% of sitting workers are not provided with adjustable chairs with backrests and approximately 10% of workers do not have adjustable work stations.
5. The emergency eyewash and shower facility in the dyeing section was rusted and contaminated with paint, dust, and/or dirt.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.17, HSE.22, and HSE.23)

Root Causes

1. The EHS committee is not involved with ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment, internal audits, PPE selection, and policy and procedure development and review.
2. The factory does not provide specific training to EHS committee members.
3. The EHS committee only meets once every two months, which is not enough to deal with EHS issues for an integrated factory with almost 3,000 workers.
4. Most of these issues have not been identified during internal or external audits.
5. The factory has implemented a very basic internal job-based risk assessment; however, the report does not include either specific risk grading or preventive and corrective actions for the risks identified in the assessment.

FLA's Recommendations for Sustainable Improvements

1. Implement a system to keep food samples in the event of incidents of food poisoning, including the following:
1. Save at least 150g of each food item served
2. Store samples in refrigerator between 0 and 4 degrees Celsius
3. Keep samples for 72 hours
2. Check the locations of water dispensers to ensure that they are not exposed to direct sunlight. Keep records of regular cleaning and sanitizing of these dispensers.
3. Provide more training opportunities to supervisors and workers on manual handling to ensure that they are following written procedures.
4. Provide anti-fatigue mats to all standing workers.
5. Maintain the emergency eyewash and shower facility in the dyeing section.
6. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.
7. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
8. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with Risk Assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
9. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
10. Review and revise existing fire risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. Completed: Factory has implemented system to keep food samples for 72 hours after serving.

   2. Completed: Drinking water dispensers are kept away from direct sunlight and factory has implemented a checklist to keep records of the periodical cleaning and sanitizing of dispensers.

   3. In Progress: Factory has started with awareness training on manual lifting to employees.

   4. Completed: Factory supplied anti-fatigue mats and adjustable chairs as required.

   5. Completed: The emergency eyewash and shower facility at dyeing section has been replaced with a new one.

   Planned Completion Date
   12/31/17

Action plan status:	Completed
Planned completion date:	06/14/17

Progress update: 07/28/17 : 3. In Progress: Factory continues with awareness training on manual lifting to employees.

May 2019 Update:
3. Completed (Feb-19-2019): Trainings on manual lifting and in the process of loading materials using the new installed elevators is being provided on a yearly basis to all applicable employees. Also EHS signs have been posted in all areas of the facility to remind employees of correct working practices.

Completion date: 02/20/19

FINDING NO.15

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation
1. Although the factory management has provided some measurements reports of the workplace environment – such as noise, thermal comfort, illumination, and air quality – these measurements were conducted by an international service provider (SGS) and is missing the following:
1. The calibration certificate and/or documentation of the measurement device
2. Training or competency certificate of the individual who did the measurements
3. References to international Health & Safety standards such as OSHA and/or NIOSH for comparison.
2. The last thermal comfort measurements (taken September 28, 2016) had problematic results in all measurement areas; the temperature was 29C to 32C and the relative humidity was 76% to 85%. However, these results were not analyzed in light of the Humidex or WBGT charts nor had any corrective actions being taken.

Local Law or Code Requirement
FLA Workplace Code (Health, Safety & Environment Benchmark HSE.13)

Root Causes
1. Since factory management commissioned a well-known service provider for these measurements, they did not think that such issues would occur.
2. Factory management lacks knowledge of international standards on thermal comfort conditions.
3. The EHS committee is not involved with ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment, internal audits, PPE selection, and policy and procedure development and review.
4. The factory does not provide specific training to EHS committee members.
5. The EHS committee only meets once every two months, which is not enough to deal with EHS issues for an integrated factory with almost 3,000 workers.
6. Most of these issues have not been identified during internal or external audits
7. The factory has implemented a very basic internal job-based risk assessment; however, the report does not include either specific risk grading or preventive and corrective actions for the risks identified in the assessment.

FLA's Recommendations for Sustainable Improvements
1. Contact service provider (SGS), and request the following:
1. Calibration certificate and/or documentation of the measurement devices used
2. Training or competency certificate of the individual who did the measurements
3. References to international Health & Safety standards, like OSHA or NIOSH.
2. Evaluate the thermal comfort measurement results in light of the Humidex or WBGT charts and take the appropriate corrective action.
3. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.
4. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
5. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with Risk Assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
6. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
7. Review and revise existing fire risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. In Progress: Factory has obtained copy of some of the calibration certificates. In the following days will obtain the remaining certificates.

2. In Progress: Factory is analyzing different options to improve temperature conditions throughout the different areas.
Planned Completion Date

Action plan status:	Completed
Planned completion date:	06/14/17
Progress update:	07/28/17 : Temperature: Factory actions that have been done and implement in daily work: I. For Knitting and Dyeing area factory provides Saline for rehydration every day. II. All areas have water cooling system so employees have fresh and cold water. III. Heat Extraction System installed at roof on Dyeing area, also roof has a gap that allows the hot air to go easily outside reducing the heat in this area. IV. Knitting area has Exhaust Fans that take the hot air to the outside. May 2019 Update: Completed (December-13-2018) : 1..Most recent yearly Air Quality and Noise Analysis were performed on September 25th of 2018; Light Level Monitoring and Temperature Analysis were performed on December 13th of 2018. Calibration Certificates of measurement devices used and Training Certificate of individual that performed the analysis are available for review. 2..Most recent yearly Temperature Analysis was performed on December 13th of 2018. Results show improvement in temperature conditions at the factory after the installation of air extraction system. Additionally water coolers are available throughout the facility and saline solution is provided to employees as needed.
Completion date:	12/14/18

FINDING NO.16

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation
1. The factory does not properly restrict access to construction areas (e.g., the ongoing elevator construction).
2. Some construction workers live in cargo containers on factory premises, as arranged between factory management and the construction company.
3. No are no speed limit signs in the factory for forklift trucks.
4. The factory does not provide safety shoes to warehouse workers, including those who use the pallet truck and forklift.
5. The factory has not labeled shelves throughout the factory and warehouse area with maximum load requirements.
6. There are no convex mirrors in the dead ends, sharp turns or corners of the movement areas for the forklift and pallet trucks.

Local Law or Code Requirement
FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, and HSE.14)

Root Causes
1. The EHS committee is not involved with ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment, internal audits, PPE selection, and policy and procedure development and review.
2. The factory does not provide specific training to EHS committee members.
3. The EHS committee only meets once every two months, which is not enough to deal with EHS issues for an integrated factory with almost 3,000 workers.
4. Most of these issues have not been identified during internal or external audits
5. The factory has implemented a very basic internal job-based risk assessment; however, the report does not include either specific risk grading or preventive and corrective actions for the risks identified in the assessment.

FLA's Recommendations for Sustainable Improvements
1. Restrict access to construction areas.
2. Do not allow construction workers to stay in containers on factory premises.
3. Install speed limiters on forklifts.
4. Provide the appropriate safety shoes to warehouse workers, including those who use the pallet truck and forklift.
5. Label shelves with their maximum load throughout the factory and warehouse areas.
6. Install convex mirrors in the blind spots for forklift and pallet trucks.
7. Revise the composition of the EHS committee to ensure that there is equal representation. Increase the frequency of EHS committee meetings; committee should meet monthly rather than every two months.
8. Conduct a training-needs assessment for EHS committee members and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
9. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation with Risk Assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
10. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.
11. Review and revise existing fire risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

COMPANY ACTION PLANS

1. 1. Completed: Construction area access is now restricted with caution tape and restriction signs.

2. Completed: Factory notified contractor and the construction workers are no longer living at factory premises.

3. Completed: Forklift's maximum speed limit signs are now posted at different locations in the required areas.

4. In Progress.

5. Completed: All shelves are now properly labeled with maximum load capacity.

6. Completed: Convex mirrors are now installed at the required spots in the movement areas of forklift and pallet trucks.
Planned Completion Date
12/31/17

Action plan status:	In progress
Planned completion date:	06/14/17
Progress update:	4. In Progress: The factory will provide adequate safety shoes to the required working positions.

2. 1. Completed: Construction area access is now restricted with caution tape and restriction signs.

2. Completed: Factory notified contractor and the construction workers are no longer living at factory premises.

3. Completed: Forklift's maximum speed limit signs are now posted at different locations in the required areas.

4. In Progress.

5. Completed: All shelves are now properly labeled with maximum load capacity.

6. Completed: Convex mirrors are now installed at the required spots in the movement areas of forklift and pallet trucks.
Planned Completion Date
12/31/17

Action plan status:	In progress
Planned completion date:	06/14/17
Progress update:	4. In Progress: The factory will provide adequate safety shoes to the required working positions.