



COMPANIES: Kay & Emms (Pvt) Limited
COUNTRY: Pakistan
ASSESSMENT DATE: 12/22/16
ASSESSOR: FLA EMEA
PRODUCTS: Apparel
NUMBER OF WORKERS: 850

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: Training (Macro)

Finding Explanation

1. The factory does not have an effective training program in place for management, supervisors, or workers and therefore does not provide specific or ongoing training on the policies and procedures for any of the Employment Functions.
2. Although the factory provides orientation training to new workers, they are not provided with any documentation that covers key points of the training.
3. The factory has not provided training on Workplace Conduct & Discipline to HR personnel, administrative staff, or managers.

Local Law or Code Requirement

The Factories Act 1934, Section 49 F; Punjab Factories Rules 1978, Rule 119 and 120; The Industrial Relations Ordinance 2002, Article 24; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, and ER.27)

Root Causes

1. Busy production schedule does not leave much time for training activities.
2. There is an absence of competent training service providers in the region.
3. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
4. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
5. The factory does not have an effective internal audit system.

6. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

FLA's Recommendations for Sustainable Improvements

1. Conduct a training-needs assessment for the management and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
2. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.
3. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.
4. Provide documentation (i.e. an employee handbook or any other written material) after orientation training. Ensure that the documentation includes: 1) Hours of Work, 2) Compensation, 3) Termination & Retrenchment, 4) Personnel Development & Recruitment, 5) Grievance System, 6) Workplace Conduct & Discipline, and 7) Factory Code of Conduct.

COMPANY ACTION PLANS

1. Company has established the training need assessment and training plan for staff and supervisors. Training is being conducted accordingly.

Action plan status: Completed
Planned completion date: 04/04/18
Progress update: Training need assessment , training plan and training has been conducted accordingly. Sample base evidence is attached.
Completion date: 07/01/17

2. Company has established the an employee handbook includes: 1) Hours of Work, 2) Compensation, 3) Termination & Retrenchment, 4) Personnel Development & Recruitment, 5) Grievance System, 6) Workplace Conduct & Discipline, and 7) Factory Code of Conduct

Action plan status: Completed
Planned completion date: 04/04/18
Progress update: Established worker Hand book material and now planned to print it as a workers Hand Book.
Completion date: 04/04/17

FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory has a written policy and procedures for Recruitment & Hiring, but not for Personnel Development.
2. Less than 1% of the factory's workers are disabled, which is less than the local law requirement of 3%. Nor does the factory make the necessary financial contribution in lieu of employing disabled workers.
3. Although there were not any cases of discrimination observed, the job application form includes questions about applicants' religion, marital status, and the number of children & dependents.
4. The factory does not document, in writing, performance reviews, nor is there a system in place for workers to provide feedback on those reviews.
5. There are no written job descriptions for any non-management positions within the factory.
6. The factory does not provide workers with a written copy of the workplace rules and policies. Although the factory previously provided it, they stopped doing so in mid 2015.
7. The factory does not provide workers with letters of employment Urdu; instead the letters are in English.
8. The factory provides employment contract on a simple piece of paper that does not include the name of the factory. Also, there are various signatures on different contracts and therefore it is not clear who in the factory actually has the authority to sign contracts.
9. The factory's procedures on Recruitment, Hiring & Personnel Development do not include guidance on special categories of workers.

Local Law or Code Requirement

The Industrial & Commercial Employment (Standing Orders) Ordinance, 1968; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.3, ER.5, ER.14, ER.25, and ER.29; Nondiscrimination Benchmark ND.2)

Root Causes

1. The personal questions on the job application forms are mainly used for data collection and management did not think they were an issue.
2. Management didn't think about potential benefits of having a written personnel development procedure
3. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

4. The local authorities do not strictly control the quota for disabled workers and the financial contribution requirements.
5. The revision of policy and procedures is ongoing and management did not want to distribute the old policy and procedures to workers during orientation.
6. Since factory management has not experienced any objections to the performance evaluation results, they did not think that they needed to keep documentation of this process.
7. Problems on the quality of documentation are mainly due to the high turnover rate of the workforce and ignorance of the HR staff due to heavy workload.
8. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
9. The factory does not have an effective internal audit system.
10. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

Recommendations for Immediate Action

Remove questions regarding marital status, number of kids & dependents, and religion, which may lead to discrimination during hiring process, from the job application forms.

FLA's Recommendations for Sustainable Improvements

1. Ensure that number of disabled workers is in line with local law requirement of 3% or financial contribution being paid in case of failure of reaching this quota for some reason
2. Ensure that performance reviews are documented in writing and there is a system in place for workers to provide feedback on those reviews
3. Ensure that there is a written procedure on personnel development which covers all necessary elements including guidance on special categories of workers
4. Prepare written job descriptions for all positions within the factory.
5. Provide employment letters to workers in local language, Urdu.
6. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
7. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.
8. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.
9. Clearly define the name and position within management who is responsible for Recruitment & Hiring.
10. Prepare an employment contract template and ensure it includes, at minimum a company logo, the company name, the company address and contact information, and the signatures of those responsible for Recruitment & Hiring.

COMPANY ACTION PLANS

1. Company has removed questions regarding marital status, number of kids & dependents, and religion, which lead to discrimination during hiring process, from the job application forms.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	Form has established accordingly.
Completion date:	06/16/17

2. 1. Company is planned to ensure that number of disabled workers is in line with local law requirement of 3% or financial contribution being paid in case of failure of reaching this quota for some reason
2. Company planned to ensure that performance reviews will be documented in writing and there will be a system in place for workers to provide feedback on those reviews
3. Company will ensure that there is a written procedure on personnel development which covers all necessary elements including guidance on special categories of workers
4. Company has prepared written job descriptions for all positions within the factory.
5. Company has provided employment letters to workers in local language, Urdu.
6. Company has conducted a training-needs assessment for EHS committee members, management, and the general workforce & revised the existing training plan in light of the assessment results and deliver these trainings.
7. Company has reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.
8. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.
9. Company is now clearly defines the name and position within management who is responsible for Recruitment & Hiring.

10 We will prepare an employment contract template and ensure it includes, at minimum a company logo, the company name, the company address and contact information, and the signatures of those responsible for Recruitment & Hiring.

Action plan status: Completed
Planned completion date: 04/04/18
Completion date: 04/15/18

FINDING NO.3

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory does not provide piece-rate workers with gratuity payment upon their termination or resignation. Currently, only salaried workers receive the gratuity payment.
2. Time keeping and payment system issues led problems in payments in previous months. Although factory's audit department identified and addressed most of these problems for the general workforce, the following incidents were not identified and need to be addressed:
 1. In August 2016, the boiler operator, technicians, and cleaning staff worked a rest day but the system did not recognize the work as overtime and therefore compensate workers accordingly.
 2. In November 2016, one worker was paid around PKR 1,000 (USD 9.50) below the legal minimum wage.
 3. The salary grade of the seven workers in the spot removing section was incorrectly classified and as a result they were on a lower wage grade.
3. Although there is a signed payroll available as a proof of all compensation, workers are nevertheless confused about compensation, as some of them were not able to confirm all their cash payments.
4. The factory has not posted the wage rates or piece rates anywhere on the production floor, as legally required.

Local Law or Code Requirement

The Industrial and Commercial Employment (Standing Orders) Ordinance, 1968; The Minimum Wages Ordinance, 1961; FLA Workplace Code (Employment Relationship Benchmark ER.18; Compensation Benchmarks C.1, C.2, C.7, and C.17)

Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. There is not a good local service provider who can provide a time keeping software with all the features requested by management.
5. Since authorized managerial staff do the manual interventions for correcting some issues (e.g., workers forgetting to punch in or out) which are also checked by workers, management did not think that this would be an issue.

Recommendations for Immediate Action

1. Provide piece rate workers their gratuity payment upon termination or resignation.
2. Compensate workers all arrears accordingly, including the supportive staff, workers in the spot removing section, and the worker who was not paid the minimum wage in November 2016.
3. Eliminate all cash payments and make all payments (wages, overtime, bonuses) through bank transfers starting January 2017 with workers' 2016 annual bonus. This was agreed to by factory management during the assessment process and closing meeting.

FLA's Recommendations for Sustainable Improvements

1. Post the wage rates and piece rates in the native language on each production floor.
2. Review existing time keeping system and software. Find a competent software company and ensure that the software immediately reports issues to the HR department.
3. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
4. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.
5. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. 1. Company is providing piece rate workers their gratuity payment upon termination or

resignation.

2. Company Compensated workers all arrears accordingly, including the supportive staff, workers in the spot removing section, and the worker who was not paid the minimum wage in November 2016.

3. Company has eliminated all cash payments and make all payments through bank transfers but only workers those are in process of account opening or in process of completing their personal file get in cash.

Action plan status: Completed

Planned completion date: 04/04/18

Completion date: 02/15/17

2. 1. Company is Posting the wage rates and piece rates in the native language on each production floor.

2. Company has reviewed existing time keeping system and software and ensured that the software immediately reports issues to the HR department.

3. Company conducted a training-needs assessment for EHS committee members, management, and the general workforce and revised the existing training plan in light of the assessment results and deliver these trainings.

4. Company reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.

Action plan status: Completed

Planned completion date: 04/04/18

Completion date: 05/31/17

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. Some workers work during the break and/or before and after regular working hours.
2. The factory's HR and internal audit department make manual corrections on the time keeping system.

Local Law or Code Requirement

The Factories Act, 1934; FLA Workplace Code (Employment Relationship Benchmark ER.23; Hours of Work Benchmark HOW.1)

Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
2. The factory does not have an effective internal audit system in place.
3. There is not a good local service provider who can provide a time keeping software with all the features requested by management.
4. Since authorized managerial staff do the manual interventions to correct some issues (e.g., workers forgetting to punch in or out) which are also checked by workers on their pay stubs, management did not think that this would be an issue.
5. Since most workers work on the piece rate system, the number of pieces they produce directly affects their salary.

Recommendations for Immediate Action

1. Ensure that workers are not working during their break or outside of regular working hours. Cut off the power of the production lines and illumination system during off-hours.
2. Ensure that all manual corrections of the time keeping system are recorded in a separate logbook that includes all relevant details (date, worker ID, reason for intervention, signatures of the relevant worker and management representative).

FLA's Recommendations for Sustainable Improvements

1. Review existing time keeping system and software. Find a competent software company and ensure that the software immediately reports issues to the HR department.
2. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
3. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.
4. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company has ensured that workers are not working during their break and for this company cut off the power of the production lines and illumination system during off-hours.
2. Company has ensured that all manual corrections of the time keeping system are recorded in a separate logbook that includes all relevant details (date, worker ID, reason for intervention, signatures of the relevant worker and management representative).

Action plan status: Completed
Planned completion date: 04/04/18
Progress update: Company is strictly implementing on this policy.
Completion date: 01/02/17

1. We have reviewed existing time keeping system and software that the software immediately reports issues to the HR department.
2. We have conducted a training-needs assessment for EHS committee members, management, and the general workforce & revised the existing training plan in light of the assessment result.
3. Company reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.

Action plan status: Completed
Planned completion date: 04/04/18
Completion date: 01/02/17

FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

1. There is no written policy or procedures on Termination & Retrenchment.
2. Approximately 20% of the personnel files of resigned workers do not have their resignation letters, as they were kept in a separate location.
3. In final settlement records, resignation letters were not found. These were kept separately and it was difficult to trace.

Local Law or Code Requirement

Standing Order # 15, The Industrial & Commercial Employment (Standing Orders) Ordinance, 1968; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, ER.19, and ER.32)

Root Causes

1. Since the factory has not experienced any cases of retrenchment and most terminations have been voluntary, they did not think there was a need to have procedures for Termination & Retrenchment procedures.
2. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
3. The problems regarding quality of documentation is mainly due to a high turnover rate of the workforce and ignorance of HR staff due to heavy workload
4. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
5. The factory does not have an effective internal audit system.
6. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

FLA's Recommendations for Sustainable Improvements

1. Create and implement a written policy and procedures on Termination & Retrenchment with the participation of worker representatives.
2. Ensure that all termination-related documents, including resignation letters, are available in personnel files.
3. Prepare and deliver specific training to supervisors on existing Termination practices. Repeat this training after finalizing the written policy and procedures.
4. Ensure that resignation letters are available in personnel files and available to review at anytime.
5. Conduct a training-needs assessment for the management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.

6. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.
7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company has established the Termination & Retrenchment policy with the participation of worker representatives.
2. Company has ensured that all termination-related documents, including resignation letters, are available in personnel files.
3. Company has conducted specific training to supervisors on existing Termination practices.
4. Company ensured that resignation letters are available in personnel files and available to review at anytime.
5. Company has conducted a training-needs assessment for the management, and the general workforce and revised the existing training plan in light of the assessment results.
6. Company has reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	Policy and procedures established
Completion date:	01/17/17

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. There is no equal representation in the disciplinary committee; there is only one worker representative out of four members (the other of whom are management).
2. The imposition of disciplinary actions or appeals to disciplinary actions are not witnessed by a third party.
3. Although the factory maintains records of disciplinary actions, they are not kept in workers' personnel files.
4. Every day, the factory conducts pat downs as a part of its security procedures.
5. As part of the disciplinary procedure in place, a committee must meet and evaluate the proposed disciplinary actions. However, it was observed that this procedure was not always followed and management bypassed this procedure and made disciplinary decisions without the committee's involvement.
6. Although the factory gives workers written and verbal notifications of disciplinary inquiries, it does not send workers notices of inquiry through the mail, as legally required.
7. Inquiry proceedings are not documented properly during the document review of disciplinary proceedings; documentation lacks details on findings. Only the final decision is documented.

Local Law or Code Requirement

Standing Order #15, The Industrial & Commercial Employment (Standing Orders) Ordinance, 1968; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, and ER.27; Harassment & Abuse Benchmark H/A.10)

Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.

FLA's Recommendations for Sustainable Improvements

1. Prepare and deliver training on Workplace Conduct & Discipline to HR personnel, administrative staff, supervisors & managers.
2. Keep records of disciplinary actions in personnel files
3. Immediately cease conducting pat-downs for workers at the factory. Only conduct pat-downs and/or searches when there is evidence of theft and with permission from the relevant authorities. Ensure that all bag searches are conducted by person(s) of the correct gender.
4. Sent workers a Notice for inquiry by mail, as legally required.
5. Revise the existing disciplinary procedures with joint efforts of both management and worker representatives to ensure the following:
 - a) equal representation on the disciplinary committee (the same number of worker and management representatives), b) third party

witnessing in the imposition of disciplinary actions or appeals of disciplinary actions, c) clear guidance on the record keeping process, and d) local law and code requirements.

6. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Workplace Conduct and Discipline

Details

1. Company has conducted the training on Workplace Conduct & Discipline to HR personnel, administrative staff, supervisors & managers.

2. Company is committed to involve the third party for witness of disciplinary action.

3.. Company is committed to record the disciplinary actions in personnel files.

4. Company has committed to ensure that all bag searches are conducted by person(s) of the correct gender.

5. It is committed that In disciplinary cases committee will evaluate the decisions taken.

6. As per legal requirement company will Notice for inquiry by mail, as legally required.

7. Company has revised the existing disciplinary procedures with joint efforts of both management and worker representatives to ensure the following:

a) equal representation on the disciplinary committee (the same number of worker and management representatives). Now policy is described clearly in native language also for clear understanding for the workers.

7. Company will consult with FLA for risk assessment to cover all risk factors.

Action plan status: Completed

Planned completion date: 04/04/18

Progress update: Disciplinary procedure has been established and for better understanding converted in native language.

Completion date: 03/17/17

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. The factory does not provide any office space or other facilities for worker representatives.

2. Members of the Joint Worker Council (JWC) are not provided with any specific training on Industrial Relations.

Local Law or Code Requirement

The Industrial Relations Ordinance 2002; FLA Workplace Code (Employment Relationship Benchmarks ER.1; Freedom of Association Benchmarks FOA.1 and FOA.15)

Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.

3. The factory does not have an effective internal audit system.

4. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

FLA's Recommendations for Sustainable Improvements

1. Organize and deliver a training to supervisors on Freedom of Association requirements at the factory.

2. Arrange office space or other facilities for JWC.

3. Organize and deliver training to members of the JWC on Industrial Relations.

4. Conduct a training-needs assessment for the management and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.

5. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.

6. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company has Organize and deliver a training to supervisors on Freedom of Association requirements at the factory.
2. Company has planned to establish the space for JWWC member till 01-06-17.
3. It is committed to conduct the training for JWWC members.
4. Company has established the training need assessment for management and general workforce .
5. Company has planned to review the labor issues through internal audit
6. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	All commitments implemented
Completion date:	03/17/17

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. The Grievance System procedure is not implemented properly. The factory has placed complaint boxes in various places; however, worker involvement is not ensured in the evaluation and addressing of complaints. Additionally, the actions taken on complaints are not posted on notice boards.
2. The location of some complaint boxes is not suitable as they are located in prominent places, such as hallways and production areas.
3. The factory does not regularly communicate with the general workforce regarding the Grievance System and its updates.

Local Law or Code Requirement

The Industrial Relations Ordinance 2002, Article 46; FLA Workplace Code (Employment Relationship Benchmarks ER.16 and ER.25)

Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

FLA's Recommendations for Sustainable Improvements

1. Ensure that the elected worker representatives in the JWC are actively involving in evaluating complaints and preparing corrective action plans.
2. Post the corrective action plans for filed complaints on the notice boards.
3. Change the location of complaint boxes to more private areas.
4. Conduct a training-needs assessment for the management and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
5. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.
6. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company planned to ensure that the elected worker representatives in the JWWC will participate in evaluating complaints and preparing corrective action plans.

2. Company will Post the corrective action plans for filed complaints on the notice boards.
3. Company will change the location of complaint boxes to more private areas.
4. Company will conduct a training-needs assessment for the management and the general workforce and will establish the training plan accordingly.
5. Company has established the internal audit tool to ensure that issues related to labor are covered.
6. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	All planned commitments are being followed.
Completion date:	03/17/17

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory does not have a written procedure for reporting environmental emergencies, including protections for workers who allege environmental violations.
2. Oil-contaminated water from the air compressor, the air tank, and dryers discharges directly onto the ground outside.
3. Although the factory's wastewater is treated by the Industrial Zone's wastewater treatment plant, it was not verified that this wastewater treatment plant has chemical treatment capability for treating the wastewater that comes from the factory's printing section. The existing documents, provided by the Industrial Zone authority to the factory, only refer to biological wastewater treatment.
4. Although the factory has a waste management procedure, it does not cover all types of waste generated within the factory.
5. The solid waste – fabric, carton, and nylon – in the solid waste storage area is not properly separated, nor is the area well organized.
6. The lights at around 80% of workstations are left on when not in use.
7. Compressed air leaks in different sections of the production areas.
8. There is solid waste scattered outside around the factory building.
9. There are broken tube lights in the hazardous waste area, which poses a risk of mercury contamination.

Local Law or Code Requirement

The Punjab Environmental Protection Act, 1997; FLA Workplace Code (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 no Environmental Protection violations in 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 management, nor has it conducted a training-needs assessment.
4. The EHS committee is not involved with issues relating to Environmental Protection; their scope of work is limited to Health & Safety.
5. The factory does not provide specific training to EHS committee members.
6. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
7. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

Recommendations for Immediate Action

1. Discontinue directly discharging oil contaminated water onto the ground outside.
2. Ensure that Industrial Zone's wastewater treatment plant has chemical treatment capability.
3. Prepare a waste management plan and ensure that the solid waste area is well organized.
4. Take extra precautions to ensure tube lights in the hazardous waste areas do not break.

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. Prepare a written procedure for reporting environmental emergencies, including protections for workers who allege environmental violations.
3. Collect all solid waste around the factory area and store in the solid waste area. Ensure that solid waste is not left around the factory

building.

4. Train workers on turning off the lights at the workstations when not in use. Monitor for compliance during internal audits.
5. Review and revise the existing internal audit tool to incorporate issues related to Environmental Protection.
6. Conduct an environmental risk assessment to identify environmental risks in the factory and address such risks.
7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company will provide an ultrasonic leak detector to the maintenance team to identify and maintain compressed air leaks in factory.
2. Company will prepare a written procedure for reporting environmental emergencies, including protections for workers who allege environmental violations.
3. Company will collect all solid waste around the factory area and store in the solid waste area and ensure that solid waste is not left around the factory building.
4. Company will train workers on turning off the lights at the workstations when not in use. Monitor for compliance during internal audits.
5. Company will review and revise the existing internal audit tool to incorporate issues related to Environmental Protection.
6. Company will conduct an environmental risk assessment to identify environmental risks in the factory and address such risks.

Planned Completion Date
05/31/17

Action plan status: In progress

Planned completion date: 04/04/18

2. 1. We have disconnected directly discharging oil contaminated water on to the ground outside by keeping there the secondary containment.
2. We have visited the area and found 26 acre Industrial Zone's waste water treatment plant has chemical treatment capability.
3. We have established waste management plan and ensured that the solid waste area is well organized.
4. We have taken extra precautions to ensure tube lights in the hazardous waste areas do not break.

Action plan status: Completed

Planned completion date: 04/04/18

Progress update: All committed plans are implemented

Completion date: 01/17/17

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not commission a third-party expert to conduct a fire risk assessment.
2. There is no list of the fire alarm zones is not posted near the fire alarm panel.
3. There is no Liquefied Petroleum Gas (LPG) detector provided in kitchen.
4. There are no fire detectors in the boiler room, compressor room, or fire pump room.
5. The fire pumps' main discharge valves are not locked in the open position.
6. The width of the second fire exit and of the fire escape stairs in the canteen is too narrow –around 50cm – for safe evacuation.
7. There is no corrosion protection for the battery terminals of either the diesel fire pump or the power generator.
8. Two of the seven emergency evacuation maps (on the ground floor and the second floor) do not reflect the actual layout of the factory building; the “you are here” labels and location of fire alarm buttons are incorrect.
9. There is not enough emergency illumination in the fire pump room to provide good visibility for manual interventions in the event of an emergency; there is only one UPS-powered emergency light (uninterrupted power supply).
10. One of the fire hydrants outside of the factory, behind the production building, leaks and requires maintenance.
11. There is no shelter for the outside fire extinguisher station, which houses 11 fire extinguishers, making them vulnerable to corrosion and malfunction.

12. The first step of the emergency stairs that serves the printing and canteen sections is higher than others, posing a falling risk.
13. The fire drill log does not include key information like attendance, time to take attendance, or number of participants.

Local Law or Code Requirement

The Fire Safety Provisions, 2016 of the Building Code of Pakistan; Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety and Environment Benchmark HSE.1, HSE.5, and HSE.6)

Root Causes

1. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
2. The factory does not have an effective internal audit system.
3. The factory management does not know much about international Environmental, Health & Safety (EHS) standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
4. It is not always possible to find a competent service provider for EHS training due to country-specific limitations (e.g., limited training and certification opportunities).
5. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
6. There have been a number of changes in the layout of production areas recently due to changes in the production flow, affecting the emergency evacuation plans.
7. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, Personal Protective Equipment (PPE) selection, policy and procedure development and review.
8. The factory does not provide specific training to EHS committee members.
9. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

Recommendations for Immediate Action

1. Post a list of the fire alarm zones in a prominent place near the fire alarm panel.
2. Install an LPG detector in the kitchen.
3. Install fire detectors in each of the boiler, compressor, and fire pump rooms.
4. Lock the main discharge valves of the fire pumps in the open position.
5. Broaden the width of the secondary emergency exit and fire escape stairs in the canteen to at least 110 cm.
6. Provide corrosion protection for the battery terminals of the diesel fire pump and generator.
7. Check all emergency evacuation plans to ensure they reflect the actual layout of the factory building.
8. Improve the emergency illumination in the fire pump room to provide better visibility for manual interventions.

FLA's Recommendations for Sustainable Improvements

1. Maintain leaking fire hydrant at the outside of the factory. Review existing periodical control and maintenance system for fire hydrants to prevent recurrence of such issues.
2. Provide protection for the outside fire extinguisher station to prevent outside weather conditions
3. Adjust the first step of the emergency stairs for the printing and canteen sections to be the same height as other steps on the staircase.
4. Revise existing fire drill log format to ensure it includes the following information: a) date and time of the fire drill; b) alarm type; c) evacuation time; d) attendance-taking time; e) number of participants; f) problems observed during evacuation; g) problems observed on emergency lighting and alarm systems; and, h) signature of the EHS committee members.
5. Provide a thermal camera to the maintenance and EHS team and allow them to conduct weekly checks on the following: a) electrical panels (especially panels in the compressor rooms, main electrical panels in each section, power generator room and panels with high load); b) the electrical wiring; c) the electrical motors and pumps; and, d) the boilers and steam lines.
6. Review existing maintenance program within the factory and implement more predictive and preventive actions, rather than conventional maintenance activities, such as: a) provide specific training to maintenance staff on predictive and preventive maintenance; b) use thermal imaging and ultrasonic measurements to identify potential issues before they occur; and, c) follow the average life span of machines, infrastructure, and equipment and conduct inspections, lubrications, repairs or rebuilds based on known average life span.
7. Conduct a training-needs assessment for EHS committee members, management, 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 in 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 risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.
11. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. 1. Company will review existing periodical control and maintenance system for fire hydrants to prevent recurrence of such issues.

2. Company will provide protection for the outside fire extinguisher station to prevent outside weather conditions
3. Company will adjust the first step of the emergency stairs for the printing and canteen sections to be the same height as other steps on the staircase.
4. Company will revise existing fire drill log format to ensure it includes the following information: a) date and time of the fire drill; b) alarm type; c) evacuation time; d) attendance-taking time; e) number of participants; f) problems observed during evacuation; g) problems observed on emergency lighting and alarm systems; and, h) signature of the EHS committee members.
5. Company will provide a thermal camera to the maintenance and EHS team and allow them to conduct weekly checks on the following: a) electrical panels (especially panels in the compressor rooms, main electrical panels in each section, power generator room and panels with high load); b) the electrical wiring; c) the electrical motors and pumps; and, d) the boilers and steam lines.
6. Company will review existing maintenance program within the factory and implement more predictive and preventive actions, rather than conventional maintenance activities, such as: a) provide specific training to maintenance staff on predictive and preventive maintenance; b) use thermal imaging and ultrasonic measurements to identify potential issues before they occur; and, c) follow the average life span of machines, infrastructure, and equipment and conduct inspections, lubrication, repairs or rebuilds based on known average life span.
7. Company will conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results.
8. Company will ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
9. Company will review and revise existing internal audit tool to ensure all potential areas of risk are covered.
10. Company will review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

Planned Completion Date
04/20/17

Action plan status: In progress

Planned completion date: 04/04/18

2. 1. We have posted a list of the fire alarm zones in a prominent place near the fire alarm panel.
2. We have removed the LPG cylinder from the kitchen and only cooked food is served.
3. We have Installed fire detectors in, compressor, and fire pump rooms.
4. We have Locked the main discharge valves of the fire pumps in the open position.
5. We increased the width of the secondary emergency exit and fire escape stairs in the canteen area which now embroidery area, b/c canteen shifted to other area.
6. We have provided corrosion protection for the battery terminals of the diesel fire pump and generator.
7. We have checked & established all emergency evacuation plans to ensure they reflect the actual layout of the factory building.
8. We have Improved the emergency illumination in the fire pump room to provide better visibility for manual interventions.

Action plan status: Completed

Planned completion date: 04/04/18

Completion date: 01/20/17

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There are high grounding readings – up to 21ohm – in some sections of the production building. There are no grounding connections for the sockets on the sewing line of the ground floor.
2. The Residual Current Devices (RCDs) in some electrical panels of the production area are not sufficient; the RCD breakers are 300mA instead of 30mA. Furthermore, some RCDs were not functioning.
3. The internal isolation of some electrical panels were not properly insulated and cover-body grounding connection of the panels are missing
4. Although the electricity in use is 220 volts, all electrical panels are labeled with “Warning 440 Volts” signs.

Local Law or Code Requirement

The Fire Safety Provisions, 2016 of the Building Code of Pakistan, Chapter 7; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 and HSE.13)

Root Causes

1. The factory does not have handheld multifunction electrical testing equipment for both the maintenance and the EHS team to use.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
5. It is not always possible to find a competent service provider for EHS training due to country-specific limitations.
6. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
7. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, Personal Protective Equipment (PPE) selection, policy and procedure development and review.
8. The factory does not provide specific training to EHS committee members.
9. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

Recommendations for Immediate Action

1. Inspect and improve the grounding connections at the sockets in the production areas.
2. Improve the grounding quality where there are high grounding readings in the production areas.
3. Replace the 300mA RCDs in the electrical panels in the production area with 30mA RCDs. Only use 300mA RCDs for the main distribution panels for fire safety purposes.
4. Maintain and improve the internal isolation of the electrical panels and ensure that cover-body grounding connections of the panels are provided.

FLA's Recommendations for Sustainable Improvements

1. Replace the 440 Volts warning signs with 220 Volts signs.
2. Buy a multifunction electrical test equipment to conduct loop, RCD, voltage drop, and insulation resistance tests within the factory.
3. Conduct a training-needs assessment for EHS committee members, management, 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 in 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 risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.
7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company will replace the 440 Volts warning signs with 220 Volts signs.
2. Company will buy a multi function electrical test equipment to conduct loop, RCD, voltage drop, and insulation resistance tests within the factory.
3. Company will conduct a training-needs assessment for EHS committee members, management, and the general workforce and will revise the existing training plan in light of the assessment results.
4. Company will ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
5. Company will review and revise existing internal audit tool to ensure all potential areas of risk are covered.
6. Company will review and revise existing risk assessment report to ensure that it

covers all risk factors and how to eliminate or mitigate those risk factors.

Planned Completion Date

04/20/17

Action plan status: In progress

Planned completion date: 04/04/18

2. 1. We have inspected and improved the grounding connections at the sockets in the production areas.
2. We have improved the grounding quality where there are high grounding readings in the production areas.
3. We have replaced the 300mA RCDs in the electrical panels in the production area with 30mA RCDs and using as per distribution panels.
4. We have maintained and improved the internal isolation of the electrical panels and ensured that cover-body grounding connections of the panels have been provided.

Action plan status: Completed

Planned completion date: 04/04/18

Progress update: All working completed

Completion date: 03/31/17

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Three out of 13 MSDS forms of the chemicals in use were missing: Babri Impex Printing, Happilac Red Oxide, and Drew Minerals 8512.
2. The PPE selection is not in line with MSDS forms and therefore not in line with the risks associated with the chemicals in use. For example, there are no masks and/or respirators made available to workers in the stain removing section.
3. The PPE does not have international quality certification marks.
4. In the production area, some chemical containers are incorrectly labeled (e.g., the detergent-water mixture is labeled as "water") or unlabeled due to fading.
5. The stain removing section is not isolated from the production area.
6. There is not a system in place for replacing hazardous chemicals (e.g., Toluene and Methylene chloride) with non-hazardous or less hazardous alternatives.
7. The filter cartridges of some respirators in the stain removing section are placed in the reverse position.
8. The factory uses empty chemical containers as waste bins.

Local Law or Code Requirement

Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.9, and HSE.10)

Root Causes

1. The factory management has difficulties getting the MSDS/SDS forms of some chemicals from their suppliers. This is also the case for international safety markings of the PPE, as there is no such local requirement.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
5. Country specific limitations, it's not always possible to find a competent service provider for EHS trainings.
6. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
7. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, PPE selection, policy and procedure development and review.
8. The factory does not provide specific training to EHS committee members.
9. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

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) Identification of substance/mixture and of the company/undertaking, ii) Hazards Identification, iii) Composition/information on ingredients, iv) First aid measures, v) Firefighting measures, vi) Accidental release measures, vii) Handling and storage, viii) Exposure control/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 the risks associated with chemicals.
4. Ensure that all PPE in use have the international quality certification marks.
5. Properly label all chemical containers.
6. Organize a separate room for stain removing operations, ensure that this room is totally isolated from rest of the production areas and provided with sufficient ventilation/vacuum systems.
7. Ensure that workers are using the respirators properly and conduct fit tests each time they wear the respirators.

FLA's Recommendations for Sustainable Improvements

1. Implement a system to replace hazardous chemicals with less hazardous alternatives.
2. Discontinue using empty chemical containers as waste bins. Inform and train relevant staff about this issue.
3. Conduct a training-needs assessment for EHS committee members, management, 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 in 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 risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.
7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. We have provided all MSDSs for all chemicals in use, available in the local language in areas where the chemicals are stored and used.
2. We have ensured the MSDSs are in line with international standards and include all 16 sections.
3. We have provided PPE in the chemical use areas that is in line with the MSDSs and therefore provides adequate protection from the risks associated with chemicals.
4. We have ensured that all PPE in use have the international quality certification marks.
5. We have ensured properly labeled all chemical containers.
6. We have organized a separate room for stain removing operations, and to ensure that this room is totally isolated from rest of the production areas and provided with sufficient ventilation/vacuum systems.
7. We have ensured that workers are using the respirators properly and conduct fit tests each time they wear the respirators.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	Stain removing room is still pending.
Completion date:	05/25/17

FINDING NO.13

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not indicated the working and maximum working pressure levels on the manometers of pressure vessels.
2. The factory has not bolted the air tanks to their permanent positions.
3. The factory has not labeled the maximum-allowable loading capacity of the shelves.
4. Approximately 70% of workers do not use needle guards; they are either shifted upwards or removed completely.
5. Approximately 60% of the inspected over lock machines do not have a vacuum system and therefore generate a significant amount of dust during their operation that increases the concentration of dust in the working environment.
6. The interlock and barrier sensor of the elevator was not functioning properly.
7. The factory only provides approximately 10% of standing workers with anti-fatigue mats.
8. The factory does not provide sitting workers with adjustable chairs with backrests.
9. The factory does not provide the relevant workers with lifting belts or train workers in proper lifting techniques.
10. The factory's Health & Safety procedures do not include measures to protect the reproductive health of workers through minimizing

exposures to workplace hazards, steps for workers to raise Health & Safety concerns, or protection against retaliation for workers who raise Health & Safety concerns.

11. The factory has not trained maintenance staff on lockout-tag out procedures.

Local Law or Code Requirement

The Factories Act, 1934; FLA Workplace Code (Employment Relationship Benchmark ER.31; Nondiscrimination Benchmark ND.8; Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.12, HSE.13, HSE.14, and HSE.17)

Root Causes

1. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
2. The factory does not have an effective internal audit system.
3. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
4. It is not always possible to find a competent service provider for EHS training due to country-specific limitations.
5. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
6. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, PPE selection, policy and procedure development and review.
7. The factory does not provide specific training to EHS committee members.
8. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

FLA's Recommendations for Sustainable Improvements

1. Mark the working and maximum working pressure levels on the manometers of the pressure vessels.
2. Bolt air tanks to their permanent positions.
3. Label the shelves/racks with their maximum allowable loading capacity.
4. Provide training to workers on the importance of using needle guards and carefully monitor this issue during internal EHS audits.
5. Provide a vacuum system for all over lock machines.
6. Maintain the interlock and barrier sensor of the elevator.
7. Provide all standing workers with anti-fatigue mats.
8. Conduct a training-needs assessment for EHS committee members, management, 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 in 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. Plan and deliver lockout-tag out training for maintenance staff
12. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.
13. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. 1. Company has marked the working and maximum working pressure levels on the manometers of the pressure vessels.
2. We have bolted air tanks to their permanent positions.
3. We have Label the shelves/racks with their maximum allowable loading capacity.
4. Company have provided training to workers on the importance of using needle guards and carefully monitor this issue during internal EHS audits.
5. Company has provided a vacuum system for all over lock machines.
6. Company has maintained the interlock and barrier sensor of the elevator.
7. Company has provided all standing workers with anti-fatigue mats.
8. We have conducted a training-needs assessment for EHS committee members, management, and the general workforce and revised the existing training plan in light of the assessment results and deliver these training.
9. We have ensured the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
10. We have Reviewed and revised existing internal audit tool and ensured all potential areas of risk are covered.
11. We have provided lockout-tag out training for maintenance staff
12. Company has reviewed and revised existing risk assessment report to ensure that it covers all risk factors and eliminated or mitigated those risk factors.

13. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	All committed actions have been completed.
Completion date:	04/05/17

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The filtering system for the drinking water is not fully operational due to lack of maintenance nor is there an active UV filter available.
2. The factory does not have a system in place to regularly clean and sanitize the drinking water tank.
3. The flush on one of the five inspected toilets did not function due to lack of maintenance
4. The water pressure at the eyewash stations in the printing section is low. Furthermore, there are no caps on the eyewash sprinkler heads to protect against the risk of contamination.
5. The metal drinking water cups are for common use, which poses a risk of spreading contagious diseases.
6. There is no procedure to store food samples for at least 72 hours to protect against potential food poisoning.

Local Law or Code Requirement

Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.19, HSE.22, and HSE.23)

Root Causes

1. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
2. The factory does not have an effective internal audit system.
3. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
4. It is not always possible to find a competent service provider for EHS training due to country-specific limitations.
5. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
6. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, PPE selection, policy and procedure development and review.
7. The factory does not provide specific training to EHS committee members.
8. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

Recommendations for Immediate Action

1. Complete the full maintenance of drinking water filtering system and add UV filter at the end of the filtering system. Regularly sanitize the drinking water tank.
2. Ensure that all toilet flushes are operational
3. Maintain eye wash stations to ensure pressure of the water is high enough. Provide caps for the sprinkler heads.

FLA's Recommendations for Sustainable Improvements

1. Discontinue the common use of metal drinking water cups. Wash cups between use and provide "clean" and "used" metal cup shelves near the drinking water dispensers.
2. Implement a system to perform quarterly maintenance of the drinking water filtering system.
3. Implement a system to keep food samples in the event of food poisoning. Including the following: a) save at least 150g of each food item served; b) store samples in refrigerator between 0 and 4 degrees Celsius; and c) keep samples for 72 hours
4. Conduct a training-needs assessment for EHS committee members, management, 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 in 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 risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.
8. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

COMPANY ACTION PLANS

1. Company has ensured full maintenance of drinking water filtering system and added UV filter at the end of the filtering system and regularly sanitized the drinking water tank.
2. Company has ensure that all toilet flushes are operational
3. Company has maintained eye wash stations to ensure pressure of the water is high enough and provided caps for the sprinkler heads.
4. Company discontinued use of metal drinking water cups and started disposable cups
5. We have implemented a system to perform quarterly maintenance of the drinking water filtering system.
6. We have provided refrigerator to store the food according to requirement.
7. We have conducted training-needs assessment for EHS committee members, management, and the general workforce and revised the existing training plan in light of the assessment results.
8. Company has ensured that EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
9. Company has reviewed and revised existing internal audit tool to ensure all potential areas of risk are covered.
10. Company has reviewed and revise existing risk assessment report to ensure that it covers all risk factors and eliminated or mitigated those risk factors.
11. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

Action plan status:	Completed
Planned completion date:	04/04/18
Progress update:	All safety measures have been taken.
Completion date:	04/13/17