

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

16 Nov 2021



Factory Information

FLA Affiliates	Burton Snowboards
Country	Bangladesh
Number of Workers	2800

Understanding this Report

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.

FLA Code Element

Number of Violations

Compensation (C)	2
Employment Relationship (ER)	11
Freedom Of Association And Collective Bargaining (FOA)	1
Harassment Or Abuse (H/A)	2
Health, Safety And Environment (HSE)	18
Hours Of Work (HOW)	4

Assessment Information

Assessor	InSync Global
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Assessment Date	16 Nov 2021
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Assessment Purpose	Factory Assessment (In-Person)
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ASSESSMENT RESULTS

Compensation (C)

Benchmark ID	C.21.1
Benchmark Details	Employers shall provide all legally mandated benefits, including holidays, leave, bonuses, severance payments and 13th month payments to all eligible workers within legally defined time periods.
Finding Details	The review of records for terminal dues revealed that payment of wages for days worked prior to leaving employment was delayed by 10 to 12 days for 7 out of 10 sampled workers.
Recommendation for Immediate Action	Terminal dues should be paid within legally defined timelines.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ labour Act 2019 -CHAPTER VI -WAGES, PAYMENT OF WAGES, ETC- 56. Time for payment of wages.□All wages payable to the worker shall be paid within 15 (fifteen) working days following the day of separation of employment of the worker by way of retirement, retrenchment, discharge, dismissal or termination etc
Benchmark ID	C.15.1.5
Benchmark Details	Employers shall provide workers a pay statement each pay period and not less frequently than once a month, which shall show bonuses.
Finding Details	The Eid bonus is paid twice a year, however, the wage slip is not provided for the bonus payments.
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Employment Relationship (ER)	
Benchmark ID	ER.17.5
Benchmark Details	Employers shall have in place procedures to track the number, types, and timing and resolution of grievances, and to communicate the resolution of grievances to the workforce.
Finding Details	<p>1. Factory does have written procedures to track resolution of grievances like recording date, time, and name of the person responsible for resolving grievances. 2. Workers report grievances to supervisors verbally. While some are addressed by supervisors, unaddressed grievances are reported to the welfare officer. The welfare officer documents some grievances while most are not documented. Management stated that grievances addressed immediately are not documented. Not recording all grievances could be a risk of failing to address some grievances. 3. Grievances reported by workers and supervisors to Management are documented with information on action taken. However, the names and signatures of the responsible person who took action are not recorded. Hence it cannot be verified if the action taken is sustainable and by the responsible person. 4. A review of complaints collected from the grievance box revealed complaints of abuse by a particular leader (supervisor) 4 times, however, the complaint was logged in the grievance register only twice instead of 4 times. Management stated that as the complaint was against the same employee, they did not log it. The concerned incident was investigated internally and it was found that allegations were false. Additionally, the workers who complained denied submitting the grievance against the supervisor.</p>
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required

Local Law	
Benchmark ID	ER.1.2
Benchmark Details	Employers shall assign responsibility for the administration of human resources to a clearly defined and adequately qualified staff member or staff members and ensure workers at all levels receive communication and training about existing policies and procedures or any revisions.
Finding Details	1. In the past 12 months, training on the Code of Conduct was provided to 1386 out of 3041 workers. 2. Awareness of health & safety is provided to child care workers during orientation and is not provided any other time to the child care workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.18.2
Benchmark Details	Employers shall ensure managers and supervisors are fully familiar with the workplace disciplinary system and in applying appropriate disciplinary practices.
Finding Details	Supervisors and managers have some information on disciplinary systems but are not fully aware of the full system.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.5.1

Benchmark Details	Employers shall ensure that all supervisors are trained in national laws, workplace regulations, and the FLA Code, workplace grievance systems, and the appropriate practices to ensure compliance.
Finding Details	In the past 12 months, training on the Code of Conduct was provided to 110 out of 365 supervisors and managers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.17.1
Benchmark Details	Employers shall have a clear and transparent system of worker and management communication that enables workers to consult with and provide input to management. This might include suggestion boxes, worker committees, designated spaces for worker meetings, union representatives, and meetings between management and workers' representatives.
Finding Details	<p>1. Written procedures on grievance handling system do not define timelines for addressing grievances at each step like supervisors, HR team, and production manager. Requirement for training and communication to employees is not included in written procedures.</p> <p>2. Guidelines on the formation of the complaints committee were provided in March 2010 to address concerns of harassment at the workplace, requiring the committee to be headed by female employees. However, the factory has a male employee heading the committee. Management stated that the reason for having a male person to head the committee are the practical challenges for female employees to work with local government authorities like visiting police stations at odd hours or being present at court when called.</p>
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.1.1
Benchmark Details	Employers shall have in place written policies and practices and maintain proper and accurate records governing all aspects of employment from recruitment, hiring and probation, including written terms and conditions of employment, job descriptions, administration of compensation, and working hours for all positions, through to retrenchment and termination processes.
Finding Details	1. Factory does not have written policies and procedures on hiring. Written policies and procedures on recruitment are maintained. 2. Factory does not have written procedures on Forced Labour. 3. Requirement for training and communication to employees is not included in written procedures.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.18.1
Benchmark Details	Employers shall have written disciplinary rules, procedures and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).
Finding Details	Requirement for training and communication to employees is not included in written procedures.
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.6.1
Benchmark Details	Employers shall have written policies and procedures and implement practices that encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to advance in their careers within the factory or beyond.
Finding Details	The factory has written policies but does not have written procedures on Personnel Development.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.7.1
Benchmark Details	Employers shall have written policies and procedures with regard to performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement/disagreement from employees in writing, and that follow all local legal requirements.
Finding Details	1. Factory does not have written procedures for performance reviews. 2. Evaluation results are not shared with workers and workers do not sign on the result sheet and are not aware of the results. They are not provided with an opportunity to provide any feedback. Based on results, increments are provided to workers.
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.8
Benchmark Details	Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements.
Finding Details	<p>1. Factory does not have written procedures for promotion, demotion, and job reassignments. 2. The HR team updates the production team every month with a list of workers who are due for mandated yearly increments based on the date of joining. The Production office distributes the list to Production managers who further distribute the lists to line leaders. The Production team collects feedback provided by line leaders and Production Managers on the performance of workers and reverts to the HR team with recommendations for promotions (in addition to legally mandated increments) and workers are promoted. There are no defined criteria for recommendations by line leaders and Production managers. Feedback is based on the interaction with workers. 3. As legally required, yearly increments of 50 % of basic wage is required to be provided to 50% of workers, and the increment between 5% to 10 % is required to be provided to the rest 50 % of workers based on results of the performance evaluation. The factory provides 5 % increment to 25 % of workers, 6% increment to 5 % of workers, 7% increment to 5 % of workers, 8 % increment to 5 % of workers, and 9 % increment to 10% of workers. The rest 50 % of workers are provided increment above 9% of the basic wage to a max of 25 %. However, the factory does not have defined criteria for grading workers who would receive increments beyond 5% up to 25%. The percentage of increments is decided by line leaders and production managers.</p>
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.19.1
Benchmark Details	Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws.
Finding Details	<p>1. Workers report grievances to supervisors verbally. While some are addressed by supervisors, unaddressed grievances are reported to the welfare officer. The welfare officer documents some grievances while most are not documented. Management stated that grievances addressed immediately are not documented. Not recording all grievances could be a risk of failing to address some grievances. 2. Grievances reported by workers and supervisors to Management are documented with information on action taken. However, the names and signatures of the responsible person who took action are not recorded. Hence it cannot be verified if the action taken is sustainable and by the responsible person. A review of logs revealed most and multiple instances of verbal abuse by supervisors. When such grievances are reported verbally, concerned supervisors are counseled in presence of workers. 3. In instances when written grievances related to harassment and Abuse are received by Sustainability Management Team, an internal inquiry is conducted by the team and in case of positive indications, the HR team is notified for further disciplinary action which involves internal inquiry and issue of show-cause notice to the concerned employee.</p>
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Freedom Of Association And Collective Bargaining (FOA)

Benchmark ID	FOA.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning freedom of association and collective bargaining. national laws, rules, and procedures protecting the rights of workers to organize and bargain collectively. Where local laws and FLA standards differ, the employer is expected to follow the highest applicable standard.
Finding Details	Written procedures on Freedom of Association does not include steps for the formation of workers representative structure (WWA - Worker Welfare Association)
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Harassment Or Abuse (H/A)

Benchmark ID	H/A.5
Benchmark Details	Employers shall not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain labor discipline.
Finding Details	The review of logs of grievances reported revealed multiple instances of verbal abuse by leaders (Supervisors). Though documented evidence suggests some action was taken by the management against the verbal abuses, such instances continue to be reported.
Recommendation for Immediate Action	Provide training to supervisors that verbal abuse is not allowed and implement a system to ensure that supervisors are held accountable for their actions.
Compliance Classifications	Immediate Action Required

Local Law	
Benchmark ID	H/A.8.3
Benchmark Details	Employers, shall develop, implement and monitor policy and procedures for eliminating the risk of violence, harassment, and abuse in the workplace. Policies and procedures shall include a clear statement that violence, harassment, and abuse will not be tolerated, procedures for the investigation of allegations, and measures to protect any complainants, victims, and witnesses.
Finding Details	Requirement for training and communication on harassment and abuse to employees is not included in written procedures.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Health, Safety And Environment (HSE)

Benchmark ID	HSE.5.1.6
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: evacuation procedures and fire drills
Finding Details	The factory does not conduct an assessment after the drill to learn how to improve the evacuation process.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Benchmark ID	HSE.9.1
Benchmark Details	All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws and international standards.
Finding Details	1. Spill response kit is not provided in diesel storage areas. 2. Secondary containers provided for storage of diesel barrels are inadequate to contain leaks. The secondary container is not provided at all under the diesel container in the Fire Pump room. Strains from leakages were seen on the floor.
Recommendation for Immediate Action	1. Spill response kit should be provided in diesel storage areas. 2. Secondary containers with adequate capacity to contain leaks should be provided for the storage of diesel barrels. The secondary container should be provided at all under the diesel container in the Fire Pump room.
Compliance Classifications	Immediate Action Required
Local Law	BANGLADESH EPZ LABOUR ACT 2019- CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES-35. Health and safety related general rules.(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise (b) to ensure the absence of any risk to safety and health while using, preserving and carrying any substance, materials etc
Benchmark ID	HSE.19
Benchmark Details	All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical, and safety and health regulations.
Finding Details	Some of the male and female toilets emitted a bad odor.
Recommendation for Immediate Action	Toilets should be maintained clean at all times.

Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations- (h) to provide seperate and adequate lavatory and toilet for male and female workers in each enterprise and to keep it clean and hygiene.
Benchmark ID	HSE.22.1
Benchmark Details	All food made available to workers shall be prepared, stored, and served in a safe and sanitary manner in accordance with all applicable laws and international standards.
Finding Details	Prepared food is supplied by external caterers. Food handlers were not using head caps and hand gloves while handling food. Prepared food was kept in uncovered containers.
Recommendation for Immediate Action	Food handlers should use head caps and hand gloves while handling food. Prepared food should be kept covered in containers.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations-(b) to ensure the absence of any risk to safety and health while using, preserving and carrying any substance, materials etc
Benchmark ID	HSE.14.1

Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1. Factory does not have a formal system for periodic inspection of vehicles. Maintenance is done when vehicles have a breakdown. 2. Traffic lanes and walk paths are not marked at all. 3. Finger guards are missing on 5 out of 6 reeve attaching machines. The factory is working on providing these safety guards. Prior to the close of assessment, a finger guard on one machine was provided and was verified by the assessor. 4. Vehicles are not inspected periodically for proper maintenance. 5. Factory does not implement a proper Lockout - Tagout arrangement. Instead, a normal lock and key (used for domestic purposes) and a tag are used.
Recommendation for Immediate Action	1. Factory should have a formal system for periodic inspection of vehicles. 2. Traffic lanes and walk paths should be marked inside the factory. 3. Finger guards should be provided on all reeve-attaching machines. 4. Vehicles should be inspected periodically for proper maintenance. 5. Factory should implement a proper Lockout - Tag out arrangement.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations- (a) to provide and maintain the safe factory building and internal system of the building, floor, stairs and passage and machinery and plant and working system for the safety and security of lives; (b) to ensure the absence of any risk to safety and health while using, preserving and carrying any substance, materials etc (f) to ensure safety measures of the machinery and equipment during the time of use or remaining in other condition
Benchmark ID	HSE.6.1

Benchmark Details	All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers.
Finding Details	1. 10 Helmets, 8 gas masks, 2 breathing equipment, 5 pairs of safety shoes, 4 pairs of hand gloves, 2 sets of fire suits, 2 fire blankets, 1 safety belt, 4 eye shields are provided for 210 firefighters and 210 fire rescue team. The amount of firefighting equipment is inadequate. 2. Water pressure in the eyewash station is low.
Recommendation for Immediate Action	1. Factory needs to provide adequate fire fighting equipment to the fire brigade. 2. Adequate water pressure should be maintained in eyewash stations.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.18.3
Benchmark Details	An appropriate stock of medical supplies shall be maintained at all times.
Finding Details	There is one bed available in the medical room used by workers for medical rest. No other examination bed or rest bed is available to meet requirements when the available bed is occupied.
Recommendation for Immediate Action	It is recommended to have adequate facilities in the medical room.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.4.1

Benchmark Details	Employers shall at all times be in possession of all legally required and valid permits and certificates related to health, safety, and environmental issues, such as: Purchase and storage of chemicals; Fire safety inspections; Machinery inspections; Waste disposal; Environmental licenses/permits; Sanitation permits, including those required for canteens; and Vehicle inspection and driver permits for all employer provided transportation.
Finding Details	1. Competency certificate of external 3rd party lift inspector is not maintained in the factory to verify the accuracy of inspection reports. 2. Air compressors and power generators are inspected internally by a factory engineer who is a qualified electrical and electronic engineer instead of a qualified mechanical engineer that is authorized by government authorities to conduct inspections.
Recommendation for Immediate Action	1. Competency certificate of external 3rd party lift inspector should be maintained in the factory to verify the accuracy of inspection reports. 2. Air compressors and power generators should be inspected by authorized persons.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh Labour Rules 2015 - (8)Lifting machinery examination: (a) Before use of all kinds of lifting machinery, their proof loads have to be examined by a competent person in the manner stated in this schedule as per Form-31.(7) Competent person: Competent person to fulfill objectives of this schedule means--- (a) Any person authorized by the Inspector General as per Form-30. Section 62. Pressure Plant- (1) Without the working cylinder or main moving machine every plant used in the company or the machinery if operated in more pressure than the normal pressure of the atmosphere (Gha) This must be checked by the skilled person (8) The result of same kinds of all of the tests recording as per form-25(Ka), he who tested must signed and that must be prepared for inspection of the Inspector. Explanation - in order to fulfill the purposes of this Rule: a) Here, 'Competent Person' means any person who is at the supervisory level of the workshop from Mechanical Department of any Engineering University. In addition, persons or institutes announced from time to time as per Form 30 by the government shall also be included in this definition
Benchmark ID	HSE.1

Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
Finding Details	1. Hazard Identification Risk Assessment was conducted by an external agency on June 2020, however, the frequency of possible accidents and information on administrative and engineering controls is not provided. 2. Risk assessment does not provide information on the number of people who could be impacted, the frequency, probability, and severity of possible accidents/ Injuries, and the information on administrative and engineering controls. 3. Factory does not conduct training to health & safety committee members. 4. Load capacity is not marked on fabric storage racks to ensure safe storage practices. 5. The factory has not implemented any COVID-19 prevention measures, such as social distancing measures on the production floor. 6. Though breaks are increased, the factory does not monitor to ensure workers maintain social distancing. Workers were seen sitting close to each other when having lunch.
Recommendation for Immediate Action	1. Hazard Identification Risk Assessment should include information on the frequency of possible accidents, and information on administrative and engineering controls. 2. Risk assessment should provide information on the number of persons who could be impacted, frequency, probability, and severity of possible accidents/ Injuries, and on administrative and engineering controls. 3. Factory should conduct training to health & safety committee members. 4. Load capacity should be marked on fabric storage racks to ensure safe storage practices. 5. Implement COVID-19 prevention measures, including the following: Information on room capacities that requires 1-meter distancing, maximum occupancy posters in work areas, update transport arrangements, reduce the number of workers in each room, install barriers in service counters to prevent transmission. 6. Factory should monitor to ensure workers maintain social distancing in dining areas.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.28

Benchmark Details	Employers shall create a system to ensure that all necessary Health and Safety protections are provided for external contractors; including protection when working within , confined spaces, maintenance issues, and general Health and Safety Issues.
Finding Details	The factory does not provide safety instructions to contractors.
Recommendation for Immediate Action	The factory should provide safety instructions to contractors.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations-(c) to aware each worker about the hazard of the work through necessary instructions and training, as the case may be, in order to ensure the protection and safety of personal health in working place.
Benchmark ID	HSE.14.3
Benchmark Details	Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers.
Finding Details	There is no sign to warn workers that the machine is a laser machine or when the laser is in use.
Recommendation for Immediate Action	The factory should have signs to warn workers where the laser is used and that it is a laser machine.
Compliance Classifications	Immediate Action Required

Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations- (a) to provide and maintain the safe factory building and internal system of the building, floor, stairs and passage and machinery and plant and working system for the safety and security of lives; (b) to ensure the absence of any risk to safety and health while using, preserving and carrying any substance, materials etc (f) to ensure safety measures of the machinery and equipment during the time of use or remaining in other condition
Benchmark ID	HSE.29
Benchmark Details	Employers shall provide all necessary protection for workers when working at heights, confined spaces, and other high-risk areas.
Finding Details	1. The entry point to confined spaces is covered, however, it does not have a safety fence and is not marked to warn workers. 2. Factory does not monitor procedures for entering confined spaces. 3. Maintenance team is not provided with fall equipment separately. Instead, they use helmets and a safety rope provided to the fire brigade team. 4. Safety shoes are not provided to maintenance workers. 5. Three welding gloves used by welders were damaged. 6. Latex hand gloves are provided to electricians instead of electrical safety gloves which are usually made of rubber.
Recommendation for Immediate Action	1. The entry point to confined spaces should be marked to warn workers. 2. Factory should monitor procedures for entering confined spaces. 3. Maintenance team should be provided with fall equipment separately and not use helmets and a safety rope provided to the fire brigade team. 4. Safety shoes should be provided to maintenance workers. 5. Welding gloves should be inspected periodically and damaged gloves should be replaced. 6. Electrical safety gloves should be provided to electricians.
Compliance Classifications	Immediate Action Required

Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations (b) to ensure the absence of any risk to safety and health while using, preserving and carrying any substance, materials etc (d) to provide appropriate protective dress and personal protective equipment and safety appliances to the workers, free of cost to avoid any accident for using risky machinery, poisonous chemical or in any special cases
Benchmark ID	HSE.17.2
Benchmark Details	Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided.
Finding Details	In the past 12 months, training on ergonomics and lifting techniques was provided to 183 out of 250 workers from warehouse and packing sections. Training is not provided to production workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.7
Benchmark Details	Workers shall be provided at no cost with all the appropriate and necessary personal protective equipment (e.g. gloves, eye protection, hearing protection, respiratory protection) to effectively prevent unsafe exposure (e.g. inhalation or contact with solvent vapors, noise, dust) to health and safety hazards, including medical waste.

Finding Details	1. One of five mesh gloves used by cutting machine operators was damaged and 3 out of 3 welding gloves were damaged. These damaged gloves were replaced prior to the close meeting of the assessment. The factory does not have a formal system to monitor and replace damaged gloves.
Recommendation for Immediate Action	The factory should have a formal system to monitor and replace damaged gloves.
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.8
Benchmark Details	Workers shall be provided with training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers. Management will ensure use of PPE as necessary.
Finding Details	1. Forklift vehicle operator was not using helmet and safety shoes while operating the forklift. 2. In the past 12 months, training on PPE was provided to 319 out of 3041 workers.
Recommendation for Immediate Action	1. Forklift vehicle operators should use helmets and safety shoes while operating the forklift. 2. Training on PPE should be provided to all workers.
Compliance Classifications	Immediate Action Required
Local Law	BANGLADESH EPZ LABOUR ACT 2019- CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES-35. Health and safety related general rules.(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise (d) to provide appropriate protective dress and personal protective equipment and safety appliances to the workers, free of cost to avoid any accident for using risky machinery, poisonous chemical or in any special cases

Benchmark ID	HSE.14.2
Benchmark Details	Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use.
Finding Details	1. In the past 12 months, training on machine operation was provided to 61 out of 1645 machine operators. Specific training is not provided to forklift vehicle operators. The operator also used to drive factory vehicles. 2. The factory does not provide training to workers with high-risk responsibilities like working in confined spaces and lockout/tagout.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.9.2
Benchmark Details	Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.
Finding Details	1. Training provided to workers handling chemicals does not include the use of spill response kits. Also, spill kits are not provided. 2. Training on the safe use of cleaning chemicals is not provided to Housekeeping workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.17.1

Benchmark Details	Workstations, including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains.
Finding Details	1. Wooden backrest attached to wooden benches is used by workers with sitting jobs. Anti-fatigue mats are provided to workers with standing jobs except for workers in the cutting section. All workers work bare feet stand on hard floors. 2. Work stations are not adjustable in height. 3. To prevent dust and dirt in work areas, workers do not use footwear inside the factory and in work areas. This could be a risk for injury from broken needles or any small metal object like rivets used in the production process and may fall on the floor. Management stated that in the case of broken needles and metal detectors, they are used to locate the broken pieces which are recovered and stored separately, and hence there is no risk of injury to workers. The practice followed may not eliminate the risk and it may not be possible to track and collect rivets that may fall on the floor while handling.
Recommendation for Immediate Action	1. It is recommended to provide appropriate seating arrangements for workers with sitting jobs and anti-fatigue mats for workers in the cutting section with standing jobs. 2. Work stations should be adjustable in height. 3. It is recommended to have appropriate arrangements for workers to avoid injuries.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ labour Act 2019 - CHAPTER IV OCCUPATIONAL SAFETY AND HEALTH, CLEANLINESS, SAFE WORK, SAFETY AND WELFARE MEASURES -(1) It is the duty and responsibility of each employer to ensure and to maintain a safe and secure healthy and congenial condition of work in his enterprise. (2) Each employer shall take the following measures in his enterprise in such manner as may be prescribed by regulations- (b) to ensure the absence of any risk to safety and health while using, preserving and carrying any substance, materials etc

Hours Of Work (HOW)

Benchmark ID	HOW.22.1
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Benchmark Details	Employers shall have in place policies for managing all working hour, overtime, and leave records in normal and exceptional circumstances.
Finding Details	Requirement for training and communication to employees is not included in written procedures on hours of work.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HOW.20
Benchmark Details	Employers shall have in place practices that conduct regular analysis of hours of work in their workplaces and procedures that demonstrate a commitment to progressively reducing excessive hours of work.
Finding Details	Production is calculated based on 10 hours of work which includes 2 hours of overtime.
Recommendation for Immediate Action	Production planning should not include overtime.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HOW.3
Benchmark Details	Employers shall provide reasonable meal and rest breaks, which, at a minimum, must comply with national laws.

Finding Details	When workers work overtime until 8.00 pm, a break for 20 minutes is provided at 5.40 pm following upon the completion of 5 hours of continuous work post the lunch break at 12.40 pm. As legally required, a break for 30 minutes is required to be provided at end of 5 hours of continuous work.
Recommendation for Immediate Action	Legally required breaks should be provided to workers.
Compliance Classifications	Immediate Action Required
Local Law	BANGLADESH EPZ LABOUR ACT 2019 - CHAPTER V WORKING HOURS AND LEAVE - 39. Interval for rest or meal. In an enterprise no worker shall be liable to-(b) work for more than 5 (five) hours in a day, unless he is given an interval of 30 (thirty) minutes for rest or meal during that day.
Benchmark ID	HOW.21
Benchmark Details	Other than in exceptional circumstances, the total weekly work hours (regular work hours plus overtime including any alternative shifts such as 4x4 or 3x3) shall not exceed 60 hours per week.
Finding Details	The review of time cards from October 2021 for sampled workers revealed that all workers worked overtime up to a total of 72 hours a week during all weeks. In March 2021 and November 2020, sampled workers worked within 60 hours a week.
Recommendation for Immediate Action	Working hours should not exceed 60 hours a week.
Compliance Classifications	Immediate Action Required

Local Law

BANGLADESH EPZ LABOUR ACT2019 - CHAPTER V WORKING HOURS AND LEAVE- Section 40. Weekly working hours.(1) No worker shall ordinarily work or be required to work in an enterprise for more than 48 (forty eight) hours in a week. (2) Subject to the provisions of section 45, a worker may work for more than 48 (forty eight) hours in a week: Provided that the total working hours of such worker shall not exceed 60 (sixty) hours in a week and on the average 56 (fifty six) hours per week in a year.

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