

# Fair Labor Association: Independent External Factory Assessment

Assessment Date :

**11 Jul 2023**



## Factory Information

FLA Affiliates	Amer Sports,Hanesbrands
Country	Bangladesh
Number of Workers	2602

## 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)	1
Employment Relationship (ER)	13
Freedom Of Association And Collective Bargaining (FOA)	1
Health, Safety And Environment (HSE)	23
Hours Of Work (HOW)	4

## Assessment Information

Assessor	InSync Global
Assessment Date	11 Jul 2023

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	When workers leave employment at the facility, they are not paid their wages for days worked since the last payday within the legally-defined timeline. They receive these wages when the facility processes the next month's payroll.
Recommendation for Immediate Action	Ensure that wages for days worked prior to leaving employment are paid within legally defined timelines.
Compliance Classifications	Immediate Action 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	1. The facility does not have a procedure to track the number, types, timing, and resolution of grievances or to communicate the resolution of grievances to the workforce. 2. The facility does not maintain a log of grievances for each grievance mechanism. One log is maintained for grievances received through the complaint box, which is opened every Saturday. The log reveals that no complaints were received between January 2022 and February 2023. In March 2023, one grievance was submitted pertaining to garments stored in the prayer area. In November 2021, one grievance was reported regarding a lack of slippers in the toilets. The assessment found that as a systematic practice, grievances are reported verbally and addressed. Workers had no complaints with the system.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER 17.1
Benchmark Details	Employers shall ensure that all supervisors are trained in national laws, regulations, and the Delta Code, and the appropriate practices to ensure compliance.
Finding Details	The facility only records those grievances reported through the complaint/suggestion box. Grievances reported through other channels are not documented.
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	In past 12 months, only 550 out of 2602 workers received training on the Code elements. The factory's training calendar does not indicate plans or timelines for training the remaining 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	Managers and supervisors have basic awareness of the disciplinary system, but are not fully aware of all disciplinary procedures, as the HR team holds responsibility for these procedures.
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	1. The facility's written policy and procedures on grievance systems do not include information on non-retaliation. 2. The assessment found that worker awareness of how the factory handles grievances and the actions that will be taken after a grievance is reported is low.
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. The facility's written procedure on Recruitment and Hiring does not designate a responsible person/s for each step (e.g. who is responsible for issuing appointment letter, providing orientation, maintaining employment documentation); nor is there information on training new employees. 2. The facility does not have written procedures on nondiscrimination. 3. The facility does not have written procedures on forced labor. 4. The facility's written procedure on child labour does not include information on documentation that will be reviewed to ensure that no underaged worker is hired. Workers are hired based on physical appearance and if in doubt, a worker's age will be verified by the factory's doctor. The procedure contains no information on responsible person/s or on the need for training. 5. The facility does not have written procedures for termination and retrenchment.
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's written procedures on skill development, implemented in 2014, only applies to sewing machine operators. Factory management explained that they plan to extend this to all workers. Information on responsible person and training of employees is not included in the procedures.
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. The factory does not have policies and procedures on performance reviews that include steps and processes, linkages to job grading, nondiscrimination, written feedback, and compliance with legal requirements. 2. The factory conducts performance evaluations for sewing machine operators who have completed 1 year of employment. Sewing machine operators who have been provided in-house training receive performance evaluations even before completing 1 year in employment. Workers from other departments do not receive performance evaluations, though they may have completed 1 year in employment and/or work at other machines (e.g cutting machine operators, machine operators from CWS/construction without sewing section, fusing machine operators).
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. The factory does not have a written policy and procedure for promotions, demotion, and job reassignment. 2. The results of the performance evaluations (conducted by the industrial engineering team) that determine annual raises (above the legally-mandated raise of 5%) are not discussed with workers prior to providing the raise. The results are not maintained in workers' individual files. Data on the scoring is maintained by the Industrial Engineering team internally. 3. Records of performance evaluations are maintained only for sewing machine operators who are promoted as a result of the evaluations. The assessment reviewed the "Increment/Promotion sheet" used to calculate performance evaluation results and found that the amount of raises differed even for workers who joined the factory within a day or two of each other. For example, two workers were hired on June 14, 2021, and June 16, 2021. The first worker received a raise of 7%, while the second received 6%. Without performance evaluation results, it cannot be verified if these raises were fairly decided. 4. A review of annual wage data for June 2023 revealed that although some workers are placed in the same pay grades by the industrial engineering department, the percentage of their raises varied between 5 % to 8 %. For example, some workers placed in grades 3, 4 &amp; 5 were provided a raise of 6% of the basic wage and house rent allowance, while some workers in the same grades were provided raises up to 8%. Management explained that this practice is used to equalize pay among workers with similar skills. This explanation indicates that raises are not determined based solely on the workers' performance - for example, to maintain parity, a worker may receive a smaller raise if his/her pay is already higher. 5. In all production processes, workers classified as Helpers are promoted based on verbal recommendation from their supervisors. The formal procedure for performance evaluation is not followed, and no documentation is maintained, making it impossible to verify that these promotions are fairly decided.</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. The factory license expired June 30, 2023. The factory applied for renewal on June 26, 2023, and is yet to receive the renewed license. 2. The factory's trade license expired June 30, 2023. The factory applied for renewal on July 5, 2023, and is yet to receive the renewed trade license. 3. The factory's fire license expired June 30, 2023. The factory applied for renewal on June 15, 2023, and is yet to receive the renewed license. 4. The factory's environment clearance certificate expired May 7, 2023. The factory applied for renewal on June 11, 2023, and is yet to receive the renewed certificate. 5. Workers receive appointment letters and employee identity cards 2 to 3 days after being hired, instead of receiving them prior to starting work as is legally required. 6. Workers receiving raises and promotions receive official letters communicating the change in pay grade. The assessment observed that these letters are dated and provided prior to the date of workers' performance evaluations. For example, one worker had a performance evaluation on June 19, 2023, but the letter to communicate their promotion was dated May 31, 2023 and the effective date of promotion was June 1, 2023. A second worker had their performance evaluation on June 18, 2023, but their notice of promotion was dated May 31, 2023 and the promotion was effective June 1, 2023. A third worker received the evaluation on January 21, 2023, but the communication was December 31, 2022 and the promotion was effective January 1, 2023. 7. Sewing machine operators, who account for 65% of total workers, receive annual raises above the legally-mandated increase of 5%. No other workers (other machine operators, non-machine operators, helpers, non-production workers) receive annual raises above the required 5%. 8. The factory issues letters to communicate pay raises (without promotion) and promotions from worker category to supervisor category. These letters are filed in workers' personnel files, but are not signed by the workers to acknowledge and accept the changes.</p>

Recommendation for Immediate Action	1. Maintain a valid factory license at all times. 2. Maintain a valid Trade license at all times. 3. Maintain a valid Fire license at all times. 4. Maintain a valid Environment clearance certificate at all times. 5. Provide appointment letters and employee identity cards before they begin work, as legally required. 6. Communicate promotions and raises that are tied to performance evaluations only after the evaluation has been conducted. 7. Provide opportunities for annual raises above the legally-mandated 5% to all workers equally, based on evaluation of performance. 8. Ensure letters to communicate raises and promotions are acknowledged and signed by workers.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	ER.3.1
Benchmark Details	Employers shall provide an orientation to new employees at the time of hiring, which includes explanations of the employers' rules, compensation package and policies for human resources, grievance systems, industrial relations, including respect of the right to freedom of association, workers' rights and responsibilities, FLA Code of Conduct, health and safety, and environmental protection.
Finding Details	The orientation does not cover Personnel Development or Non-Retaliation.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.1.3
Benchmark Details	Employers should implement an annual, review process with input from workers of all policies, procedures and their implementation to ensure they meet legal requirements and the FLA Workplace Code.

Finding Details	Workers are not consulted or integrated in decision-making processes that impact the workplace and working conditions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.3.3
Benchmark Details	Workers should be provided with written documentation that substantiates all the issues covered in orientation briefings.
Finding Details	Workers do not receive a written document that substantiates all issues covered in orientation.
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	The management representative who serves as president of the Worker Participation Committee (the Head of Factory Operations) is not nominated by owner of the factory.
Recommendation for Immediate Action	Ensure that the management representative/s in the Worker Participation Committee are nominated by the factory owner, as is legally required.
Compliance Classifications	Immediate Action Required
Local Law	

## Health, Safety And Environment (HSE)

Benchmark ID	HSE.6.2
Benchmark Details	A sufficient number of workers shall be trained in first aid and firefighting techniques. Training shall be upon hire and with periodic refresher training.
Finding Details	The factory has assigned responsibilities for ensuring that special categories of workers, pregnant women, and children from the childcare room are evacuated. It has not, however, provided specific training on this responsibility.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.5.1

Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: posting evacuation plans; the installation and maintenance of fire alarms; the installation and maintenance of emergency lighting; ensuring aisles/exits are not blocked and that workers are not blocked within their workstations; employee education and training; and evacuation procedures and fire drills.
Finding Details	1. Exit signs in the work areas are not illuminated at all times - they illuminate only when there is no electric power supply. 2. Evacuation markings are slightly faded in the work areas on the 2nd and 3rd floors in building 1.
Recommendation for Immediate Action	1. Ensure that exit signs are illuminated at all times. 2. Ensure that evacuation directions are prominently marked and visible at all times.
Compliance Classifications	Immediate Action Required
Local Law	
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 fire drills to learn how to improve the evacuation process.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.5.1.3

Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: installation and maintenance of emergency lighting
Finding Details	Household lightbulbs are installed on staircase landings to serve as emergency lights. These lights may not be effective in case of smoke.
Recommendation for Immediate Action	Install proper industrial emergency lights on staircase landings.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.5.1.4
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following: ensuring aisles/exits are not blocked and that workers are not blocked within their workstations
Finding Details	The assessment observed multiple instances of workers in the sewing area sitting close together and at right angles to each other. Others were sitting back to back with little or no space between their chairs. This arrangement restricts workers' ability to push back and stand up during evacuation. The assessment also observed sewing machine operators, snap button machine operators on the 2nd floor, and ironers in the finishing section who were boxed into their work stations with no access to passages.
Recommendation for Immediate Action	Ensure that passages are easily accessible from workstations, without obstruction, at all times.
Compliance Classifications	Immediate Action 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. A spill response kit is not in place near the diesel and machine oil storage area outside the power generator room. 2. The secondary containment for the diesel oil and machine oil containers is inadequate to contain leaks. The containers are placed on the ground with slightly raised walls, which may not be effective in preventing overflow.
Recommendation for Immediate Action	1. Provide a spill response kit near the diesel and machine oil storage area outside the power generator room. 2. Install secondary containment with adequate capacity for oil containers.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.2
Benchmark Details	All documents required to be available to workers and management by applicable laws (e.g. health and safety policies, MSDS, environmental emergency plans) shall be made available in the prescribed manner and in the local language or language spoken by the workers, if different from the local language.
Finding Details	1. The factory does not maintain proof of certification for the external engineers from a service provider who inspected 3 compressors connected to 1 air tank (pressure vessel) and 2 boilers. 2. The external service provider inspected the factory's lifts and compressors on January 27, 2023 which was a rest day (Friday). Management explained that inspections are usually carried out on rest days. The visitor log book maintained by Security Guards did not have an entry for these inspectors on the rest day, making it impossible to fully verify the inspection. 3. The inspection report for the January 27 machine inspection does not include the name of the inspector or the signature of the service provider's Director.

Recommendation for Immediate Action	1. Maintain certificates of all external engineers with inspection reports. 2. Fully verify that lifts and compressors are inspected prior to obtaining and accepting inspection reports. 3. Ensure that proper names and signatures are recorded on inspection reports.
Compliance Classifications	Immediate Action Required
Local Law	
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	A common towel used by all workers is provided in the toilets for drying hands. This arrangement may not be hygienic.
Recommendation for Immediate Action	Ensure that hygienic hand drying facility is available in toilets.
Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.13
Benchmark Details	All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.
Finding Details	The factory uses 4 power generators which do not have noise protection canopies. The assessment observed that the operator is provided with ear muffs.
Recommendation for Immediate Action	Install noise reduction canopies on power generators.

Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1. Vehicles are not inspected periodically. Maintenance work is done when drivers raise an issue. 2. Traffic lanes and walk paths inside the factory are not marked. 3. One of two ladders checked at random did not have anti-skid stoppers. 4. The needle guards were pushed upwards, rendering them ineffective, on approx. 80 % of sewing machines. 5. The factory has lock-out/tag-out equipment, but does not implement a LOTO system. Awareness of LOTO is low among the workforce.
Recommendation for Immediate Action	1. Ensure vehicles are inspected periodically. 2. Ensure traffic lanes and walk paths inside the factory are marked to avoid accidents. 3. Ensure all ladders have anti-skid stoppers to prevent accidental falls. 4. Ensure needle guards are maintained in place to prevent injury to sewing machine operators. 5. Ensure that a LOTO system is implemented effectively.
Compliance Classifications	Immediate Action Required
Local Law	
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	There are 76 smoke masks, 78 hand gloves, 2 fire suits, 46 helmets and 2 pairs of fire resistant boots available for firefighting. This is inadequate for a team of 420 (210 fire fighters and 210 fire rescuers). Eye shields are not provided at all.

Recommendation for Immediate Action	Ensure adequate fire fighting equipment is provided to fire fighters and rescue teams.
Compliance Classifications	Immediate Action Required
Local Law	
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. 3 out of 5 toilets tested at random in the male toilets on the 3rd floor, and 5 out of 25 female toilets on the 1st and 2nd floors, did not flush properly. 2. Fabric storage racks do not have posted maximum capacities to prevent accidents.
Recommendation for Immediate Action	1. Ensure that all toilets are functioning at all times. 2. Ensure that load capacities are marked on storage racks.
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 information to contractors.
Recommendation for Immediate Action	Ensure safety information is provided to contractors.
Compliance Classifications	Immediate Action Required

Local Law	
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	Safety instructions are not posted near the factory's machinery, including sewing machines, over lock and flat lock machines, snap button machines, cutting machines, layering machines, fusing machines, quilting machines, boilers, compressors, and power generators.
Recommendation for Immediate Action	Ensure safety instructions are posted near all machinery in the appropriate language/s.
Compliance Classifications	Immediate Action Required
Local Law	
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. Entrances to confined spaces are covered with metal covers, but the areas are not marked and warning signs are not posted. 2. Cleaning of confined spaces is outsourced to external service providers. The factory does not have written procedures and does not monitor safety conditions for the service providers' workers who enter confined spaces for cleaning. 3. The maintenance team are not provided with, and do not use, helmets when working at heights. 4. Maintenance equipment such as electric drill machines and other tools used by the maintenance team are not inspected periodically to ensure safety.

Recommendation for Immediate Action	1. Ensure that confined spaces are marked and signs are posted. 2. Ensure that cleaning of confined spaces is monitored for safety. 3. Ensure that the maintenance team is provided with and uses helmets when working at heights. 4. Ensure that maintenance equipment and tools used by the maintenance team are inspected periodically.
Compliance Classifications	Immediate Action Required
Local Law	
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 was provided to 2400 out of 2602 workers. The factory's training calendar does not include information on training for the rest of the workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.5.4
Benchmark Details	The emergency evacuation plan (EEP) includes procedures for notifying local community authorities in case of accidental discharge or release of chemical/waste products or any other environmental emergency.
Finding Details	The factory's emergency response plan does not include gas-related emergencies. Gas is used as fuel for the factory's boilers.
Recommendation for Immediate Action	Incorporate potential gas-related emergencies into the Emergency Response Plan.

Compliance Classifications	Immediate Action Required
Local Law	
Benchmark ID	HSE.30.2.6
Benchmark Details	The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system including a HS&E risk assessment within which the following are clear and regularly tested and reviewed:protections to workers who allege health, safety, and environmental violations;
Finding Details	The factory has identified risks, but not conducted a full risk assessment.
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	The factory provides mesh gloves of one standard size to operators of the handheld cutting machine. The assessment observed that most gloves are too big for the workers.
Recommendation for Immediate Action	Provide mesh gloves of appropriate size to cutting machine operators.

Compliance Classifications	Immediate Action 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. The electrical and machine maintenance teams do not use safety shoes. Snap button machine operators do not use eye shields, nor are eye shields provided. 2. In the past 12 months, training on PPE usage and maintenance was provided to 383 out of 2602 workers. The factory's training calendar indicates months for the remaining trainings (no exact dates) but does not include information on number of workers who will be trained or the timeline for reaching the remainder of the workforce.
Recommendation for Immediate Action	1. Ensure safety shoes are provided to electrical and machine maintenance team and that eye shields are provided to and used by snap button machine operators. 2. Ensure training on use of PPE is conducted for all workers.
Compliance Classifications	Immediate Action Required
Local Law	
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, the factory trained 1571 out of 1800 machine operators on proper operation. The factory's training calendar indicates trainings scheduled for each month (not exact dates) and does not include information on how many of workers will be trained or the timelines for completing trainings. 2. The factory does not provide training to workers operating vehicles at all. 3. The factory does not provide safety training to designated workers with special/high-risk responsibilities (electrical issues, confined space, lockout/tagout, work at heights).
Recommendation for Immediate Action	Provide complete safety training to all workers.
Compliance Classifications	Immediate Action 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	In the past 12 months, training on chemical safety was provided to 4 out of 15 workers who handle chemicals. The factory's training calendar indicates months for training (not exact dates) and does not include information on number of workers who will be trained or the timeline for training all relevant 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. The assessment observed some (approx. 2%) workers who sit at their stations using stools with no back rest. 100% of seated workstations have hard wooden chairs/benches/stools, and only a few workers were using cushions to sit on. Workers who stand at their stations in the cutting section are not provided with anti-fatigue mats, and some workers were seen working in bare feet. These practices increase the risk of bodily injury. 2. Work stations are not adjustable in height to suit workers' own height.
Recommendation for Immediate Action	1. Ensure that appropriate sitting arrangements and anti-fatigues mats are provided for workers, based on their stations. 2. Ensure workstations are adjustable in height to suit workers' height.
Compliance Classifications	Immediate Action Required
Local Law	

## Hours Of Work (HOW)

Benchmark ID	HOW.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.
Finding Details	1. Sampled worker timecards from June 2023, January 2023, and August 2022 reveal that workers performed overtime (between 2 to 4 hours on each day) on most days (15 to 20 working days per month). 2. The overtime consent sheet is signed every day by 8 representatives of the workers' committee, which represents 2602 workers. The sheet is taken to mean that all workers consent to work overtime. This signature may not necessarily indicate willing consent from all workers. The assessment noted that workers interviewed had no complaints with this practice.

Recommendation for Immediate Action	1. Ensure workers do not work overtime on all days as a systematic practice. 2. Ensure workers sign overtime consent sheet themselves.
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HOW.22.1
Benchmark Details	Employers shall have in place policies for managing all working hour, overtime, and leave records in normal and exceptional circumstances.
Finding Details	The factory's written procedures on Hours of Work do not include information on how working hours will be recorded, information on attendance bonuses, the person/s responsible for the issue, or the need for training of employees.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HOW.9.2
Benchmark Details	Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances sufficiently in advance to allow workers to make alternative plans.
Finding Details	Overtime requirements are communicated to workers during lunch breaks and not at the beginning of their shifts.
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
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	100% of sampled workers from June 2023 and January 2023, and 80% of sampled workers from August 2022, worked beyond 60 hours in at least one week of the month. Workers performed from 60 to 72 hours of work in the weeks reviewed. These workers hailed from all production processes at the factory.
Recommendation for Immediate Action	Ensure that workers do not work beyond 60 hours week.
Compliance Classifications	Immediate Action Required
Local Law	

