

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

14 Jun 2023



Factory Information

FLA Affiliates	Lululemon Athletica Inc.
Country	Indonesia
Number of Workers	2507

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)	11
Freedom Of Association And Collective Bargaining (FOA)	1
Health, Safety And Environment (HSE)	20
Hours Of Work (HOW)	2

Assessment Information

Assessor	Donny Triwandhani
Assessment Date	14 Jun 2023

Assessment Purpose	Factory Assessment (In-Person)
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ASSESSMENT RESULTS

Compensation (C)

Benchmark ID	C.7
Benchmark Details	All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid accurately.
Finding Details	Outsourced security guards are required to have a group meeting 30-45 minutes before their shift start and this activity is not compensated.
Recommendation for Immediate Action	Ensure all work activities, including regular meeting conducted by outsourced security guards at factory before their normal shift, are compensated.
Compliance Classifications	Immediate Action Required
Local Law	Law No. 13 on Manpower (2003), Article 78(2); Government Regulation No. 36 Year 2021 Article 39.

Employment Relationship (ER)

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	There are no ongoing trainings on all FLA's Code elements and Employment Functions in 2023. The last trainings were in periods January 2022 and March 2022, and do not cover recruitment, hiring & personnel development, termination & retrenchment, grievance, disciplinary system, and environmental protection.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
Benchmark ID	ER.2
Benchmark Details	Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, probationary workers, home workers, and pregnant or disabled workers, are implemented. Where local laws and FLA standards differ, the employer is expected to follow the highest applicable standard.
Finding Details	There are only 6 workers with disabilities out of a total of 2,507 employees. This is not in compliance with a local law that requires the factory to hire one person with disabilities per 100 employees. Thus, for a factory with 2,507 employees in total, the factory has to hire at least 25 workers with disabilities, as per legal requirements.
Recommendation for Immediate Action	Establish a program to provide training and employ more workers with disabilities.
Compliance Classifications	Immediate Action Required
Local Law	Law No.8 Year 2016 About Persons with Disabilities on Article 53 (2)
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	The specific training to the relevant supervisors does not include FLA Code, termination & retrenchment, workplace conduct & disciplinary system, grievance, health & safety and environmental protection. In addition, there is no specific training for supervisors conducted in 2023, the last training was on April 28, 2022.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
Benchmark ID	ER.17.6
Benchmark Details	Employers shall have a system in place to prevent retaliation against or discrimination towards workers who are filing grievances, including grievances regarding harassment, abuse, violations of factory procedures, compensation, or unsafe working conditions
Finding Details	As the factory does not have a policy or procedures on anti-retaliation, there is no system in place to prevent retaliation or discrimination against workers who file grievances, including grievances regarding harassment, abuse, violations of factory procedures, compensation, or unsafe working conditions, health & safety, and environmental protection.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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. In cases where child labor is found, the factory does not have full procedures to remediate the issue. 2. There are policies and procedures governing all aspects of termination, but available policies and procedures do not include retrenchment.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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	There are no policies and procedures on personnel development.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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 policies and procedures on performance reviews do not include steps and processes, linkages to job grading, written feedback, and compliance with legal requirement. 2. Performance review is conducted only for staff level (level 2 and up), not for all workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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	Factory's job mutation /reassignment procedures are not implemented: (a) There is no record that workers are informed their right to refuse mutation. (b) There is no mutation letter issued before workers are transferred to other department or building.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A

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	Orientation training for new workers does not include information about legal benefit of maternity leave, miscarriage and menstruation leave, recruitment, hiring and personal development, termination & retrenchment, freedom of association, health & safety and environmental protection.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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	The factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A

Benchmark ID	ER.18.4
Benchmark Details	The disciplinary system shall include a third party witness during imposition, and an appeal process.
Finding Details	The disciplinary procedures and implementation do not include workers' ability to have a third party witness during the imposition of disciplinary actions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A

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	There is a policy on Freedom of Association but there are no procedures.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A

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 an insufficient number of workers trained in firefighting. There are 2,507 workers but only several workers are trained on how to use the fire extinguishers. Additionally, the trainings on fire extinguishers are not conducted periodically. Training on how to use the fire extinguishers (factory referred to them as "fire drills") were conducted on January 14, 2022 for 11 selected workers, on November 18, 2022 for 12 workers and May 19, 2023 for 3 security guards and 6 workers.
Recommendation for Immediate Action	Ensure there are a sufficient number of workers trained in first aid and firefighting and conduct ongoing training on how to use the fire extinguishers.
Compliance Classifications	Immediate Action Required
Local Law	Decision of Minister of Manpower No. KEP-186/MEN/1999 on Fire Prevention Units at Workplaces (1999), Article 2; Act No. 1 on Safety (1970), Article 9(3).
Benchmark ID	HSE.5.3
Benchmark Details	Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually.
Finding Details	Evacuation drill for 2023 has not been conducted. The last 2 evacuation drills were on January 13, 2022 and September 21, 2022.
Recommendation for Immediate Action	Conduct evacuation drill twice a year involving all employees including office staffs, Managers and Directors, and visitors and suppliers if happen to be in factory.
Compliance Classifications	Immediate Action Required

Local Law	Act No. 1 on Safety (1970), Article 9(3).
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. The factory does not have written procedures prohibiting smoking within 15 meters (~50 ft.) of all closed areas. There were only posted no smoking signs in some areas such as the chemical warehouse and near the boiler and generator. 2. Two evacuation maps in building 3 are not in the correct orientation. This has to be rotated 180 degrees.
Recommendation for Immediate Action	1. Establish written procedures and post signs to prohibit smoking within 15 meters (~50 ft.) of all closed areas. 2. Ensure all evacuation maps are in the correct orientation as per actual room layout.
Compliance Classifications	Immediate Action Required
Local Law	Government Regulation No. 36 on Building (2005), Article 59.
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	There are no emergency lights installed above main emergency exits in building 3.
Recommendation for Immediate Action	Install emergency lights above main emergency exits in building 3.

Compliance Classifications	Immediate Action Required
Local Law	Regulation of The Minister of Labor No.7 on Health Condition, Cleanlines and Lighting in Work Place (1964), Article 13.4.
Benchmark ID	HSE.5.1.2
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 fire alarms;
Finding Details	The factory has 3 buildings in 3 different compounds. The fire alarm in factory 3 is not centralized. Moreover, the centralized fire alarm at the factory 1 and 2 is not functioning properly: (a) The control panel's indicator that identifies the location of the triggered fire alarm is not functioning and turned off. (b) There is no fire alarm testing carried out by the fire consultant, and no evidence the backup battery for the fire alarm in the control panel is regularly checked to ensure functioning.
Recommendation for Immediate Action	1. Ensure that all factory buildings are installed with functioning centralized fire alarm system with adequate backup battery 2. The fire alarm system testing is to be carried out by the fire consultant annually.
Compliance Classifications	Immediate Action Required
Local Law	Regulation of the Minister of Manpower No. PER-02/MEN on Automatic Fire Alarm Installations (1983), Article 57
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) There is no proper spill response equipment ready for use at chemical storage areas. The factory only provides sand to pour over chemical spill as a spill response. (2) Empty chemical containers are stored in chemical warehouse in building 1 instead of storing in hazardous and toxic waste (B3) warehouse. (3) Assessor found used mineral water bottles are used to contain oil and liquid soap in mechanic and maintenance areas. These mineral water bottles are not labeled with what they contain.
Recommendation for Immediate Action	(1) Provide proper spill response equipment such as absorbent socks and absorbent pads ready for use at chemical storage areas. (2) Ensure empty chemical containers are stored in hazardous and toxic waste (B3) warehouse. (3) Do not use mineral water bottles to contain chemicals including oil and liquid soap.
Compliance Classifications	Immediate Action Required
Local Law	Decision of the Minister of Manpower No. KEP-187/Men on Control of Hazardous Chemicals at Workplace (1999), Article 2; Decision of the Minister of Labor No.187 on Hazardous Chemicals Control at Work (1999), Article 5.
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	1.The factory's lactation room access is within the clinic room at building 3, which exposes those using the lactation room to cross-contamination from airborne diseases. 2.Furthermore, there is only one bed available in the clinic room at building 3.

Recommendation for Immediate Action	<p>1. Ensure that the lactation room is not within the clinic room, and at a minimum includes: (a) availability of specific rooms with a minimum size of 3x4 m2 and/or adjusted by the number of women who are breastfeeding; (b) there is a door that can be locked, which is easily opened/closed; (c) floor tile/cement/carpet; (d) ventilation and sufficient air circulation; (e) free of potential hazards in the workplace including pollution-free; (f) a fairly quiet environment away from the noise; (g) indoor lighting and not dazzling enough; (h) humidity ranged between 30-50%, maximum 60% (i) available sink with running water for hand washing and washing equipment.</p> <p>2. Provide 2 beds in the clinic, and curtain or segregation between 2 beds for privacy of male and female patients who lie down on the bed.</p>
Compliance Classifications	Immediate Action Required
Local Law	Regulation of Ministry of Health No. 15 on Specific Procedures for Providing Nursing and/or Milking Facilities (2013), Article 10
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1. Two compressed gas cylinders in workshop are not chained to prevent falling. 2. There are no Lockout-Tagout Devices and Locks available.
Recommendation for Immediate Action	1. Ensure all compressed gas cylinders in workshop are chained to prevent falling. 2. Provide Lockout-Tagout Devices and Locks, and implement Lockout-Tagout to neutralize energy sources during a maintenance or repair operation of a machine.
Compliance Classifications	Immediate Action Required
Local Law	Regulation of the Minister of Labour No. 7 (1964), Article 5(11) - (12)
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	The provided equipment for firefighting team to fight fires does not include Self-contained breathing apparatus (SCBA) and fire blanket. In addition, there is no specific cabinet to store the provided equipment for firefighting team. As result, fire resistant clothing was hung side by side with security guards' personal jacket in security post.
Recommendation for Immediate Action	1. Provide the fire brigade team with breathing apparatus and fire blankets. 2. Store all available equipment to fight fires in specific cabinet on accessible area.
Compliance Classifications	Immediate Action Required
Local Law	Regulation No. PER-08/MEN/VII on Personal Protective Equipment (2010), Article 7
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	There is no permit obtained from local authority to store hazardous and toxic wastes in building 3 although there are many hazardous and toxic wastes (B3 materials) in the warehouse.
Recommendation for Immediate Action	Obtain a permit to store hazardous and toxic wastes (B3 materials) for building 3.
Compliance Classifications	Immediate Action Required

Local Law	Government Regulation No. 18 on Management on Hazardous and Toxic Waste (1999), Article 40 (1), (3)
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
Finding Details	The factory has not conducted an asbestos assessment. As a result, there are no labels for materials in the factory potentially containing asbestos.
Recommendation for Immediate Action	Conduct an asbestos assessment and label any materials in the factory containing asbestos.
Compliance Classifications	Immediate Action Required
Local Law	Manpower Minister Regulation No 3 Year 1985 Article 5
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) There are procedures for entering confined spaces, but the factory does not maintain a list of the location of confined spaces on the premises. As result, confined spaces are not marked with a sign "do not enter without permit" to ensure that there is no unauthorized entry. (2) The high work areas (such as water storage and boiler chimney) are not properly marked with safety precautions (such as: fall hazard signs and usage of PPE signs. (3) There is no safety rod provided on every electrical panel as rescue equipment to push and or pull electrocuted person. (4) There is no ladder available for workers to lift up /down fabrics and boxes from high shelf in panel cutting warehouse of building 3. (5) The moving ladder, with 3 steps height about 1.2 meters, in panel cutting warehouse of building 1 is not equipped with handrails.

Recommendation for Immediate Action	(1) Maintain a list of the location confined spaces in the premises, and mark all confined spaces with a sign "do not enter without permit" to ensure that there is no unauthorized entry. (2) Mark all elevated work areas such as water tanks and boiler chimneys with safety precautions such as fall hazard signs and usage of PPE signs. (3) Provide safety rods at every electrical panel as rescue equipment to push and or pull electrocuted persons. (4) Provide a ladder with secure handrails in panel cutting warehouse of building 3. (5) Install handrails to the moving ladder in panel cutting warehouse of building 1.
Compliance Classifications	Immediate Action Required
Local Law	OHS Guidance for confined spaces by Directorate of OHS Norm Supervisory, September 2006 Article 2.1.2; PUIL 2000 Article 9.9.1.1; Regulation No. PER-01/MEN on Safety and Health in The Building Construction (1980), Article 25; Ministerial Decree of Public Works No. 10/KPTS on Technical Security Provisions of Fire Hazard in Buildings and Environment (2000), Annex, Chapter 3, Article 3 (17)
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	Ergonomic training was conducted on December 5, 2022 only for 19 workers from the accessories warehouse, while workers in other departments such as packing and loading/unloading have not been trained.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
Benchmark ID	HSE.10.1

Benchmark Details	Material Safety Data Sheets (MSDS) for all chemicals and hazardous substances used in the workplace must be available at the usage and storage sites of the chemicals and hazardous substances, in the local language and the language spoken by workers, if different from the local language.
Finding Details	There is no MSDS available for hardener that is being stored in chemical warehouse building 3.
Recommendation for Immediate Action	Post MSDS for all chemicals used and stored in factory.
Compliance Classifications	Immediate Action Required
Local Law	Decision of the Minister of Labor No.187 on Hazardous Chemicals Control at Work (1999), Article 6.
Benchmark ID	HSE.23.1
Benchmark Details	Safe and clean drinking water shall be freely available at all times, within reasonable distance of the workplace. Drinking water shall be of a reasonable temperature. The means to drink water (e.g. cups) must be safe and sanitary and available in an appropriate number.
Finding Details	The means to drink water are not safe and sanitary for workers. 1. Around 70% of workers are using disposable plastic bottles (used mineral bottles) to refill potable water provided by the factory. The plastic material of this bottle is PET 1 (one-time usage - disposable). 2. Assessor observed around 12 uniform bottles (same brand mineral water) stored together on one shelf and there is possibility workers unintentional drink water of other workers' bottle risking spreading disease.
Recommendation for Immediate Action	1. Post warning signs in regards to forbidding used mineral water bottles used as refill bottles. 2. Conduct PET awareness for workers.
Compliance Classifications	Immediate Action Required
Local Law	Kepmenperind No 705 Year 2003 Article 9

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	Please review ER.17.6 for details
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
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	Not all workers are provided with the necessary personal protective equipment and PPE is not properly stored. (1) According to factory safety officer, only mechanics who are responsible for moving sewing machines are provided with safety shoes. However, assessor found 4 mechanics were pushing sewing machines who do not have safety shoes. (2) The respirator/chemical mask available in the chemical storage room is not kept in a sealable plastic bag to avoid dust.
Recommendation for Immediate Action	(1) Provide safety shoes to all mechanics. (2) Store respirators in sealable plastic bags (e.g. zip-lock bags) to avoid dust. Maintain a record of how long these respirators are used and stored.

Compliance Classifications	Immediate Action Required
Local Law	Act No. 1 on Safety (1970), Article 14(c); Regulation No. PER-08/MEN/VII on Personal Protective Equipment (2010), Article 8
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	The factory does not provide ongoing PPE training so that cover all workers. The PPE training was conducted only 15 workers mostly from laboratory on March 10, 2023 and for 33 workers from cutting section on August 19, 2022.
Recommendation for Immediate Action	Ensure to conduct training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers.
Compliance Classifications	Immediate Action Required
Local Law	Regulation No. PER-08/MEN/VII on Personal Protective Equipment (2010), Article 7.
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	Safety training has not been conducted with all workers with special or high-risk job responsibilities (work in confined spaces, lockout/tagout, work at heights). Only 4 maintenance workers received the training on April 1, 2022, while there are 15 maintenance workers, 39 mechanics and 26 general workers.
Recommendation for Immediate Action	Conduct safety training for all workers with special or high-risk job responsibilities (work in electrical issues, confined spaces, lockout/tagout, work at heights).

Compliance Classifications	Immediate Action Required
Local Law	Act No. 1 on Safety (1970), Article 9(1) - (2)
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	The factory does not implement adequate ergonomic program: (a) The stretching exercise program has been stopped since April 2023. (b) Around 50% of workers who work in a standing position in QC/finishing section at building 1 and 2 do not have anti-fatigue mats. (c) Workers who work standing are not provided with seating facilities for occasional use.
Recommendation for Immediate Action	(a) Establish a regular stretching exercise program. (b) Provide anti-fatigue mats for all workers who work in standing position. (c) Provide seating facilities for occasional use for workers who work standing.
Compliance Classifications	Immediate Action Required
Local Law	Regulation of the Minister of Labour No. 7 (1964), Article 9(3)

Hours Of Work (HOW)

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 policies and procedures on hours of work do not include exceptional circumstances.

Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	N/A
Benchmark ID	HOW.17
Benchmark Details	Employers shall not impose any undue restrictions on sick leave. Any workplace restrictions or procedures regarding sick leave (e.g. informing the employer as soon as possible, the provision of medical certificates, the use of designated doctors or hospitals) must be in line with national laws, regulations and procedures and must be communicated in full to all workers.
Finding Details	Sick leave is not paid if the doctor's reference letter is not from a recognized clinic or hospital, and/or the letter from the clinic does not specifically mention the patient needs bed rest.
Recommendation for Immediate Action	Ensure all sick leave is paid and do not impose any undue restrictions on sick leave.
Compliance Classifications	Immediate Action Required
Local Law	Law No. 13 on Manpower (2003), Article 93(2) - (3); Government Regulation No. 36 Year 2021 Article 40 (2) -(3)

