

# Fair Labor Association: Independent External Factory Assessment

Assessment Date :

**13 Jun 2023**



## Factory Information

FLA Affiliates	alphabroder
Country	Pakistan
Number of Workers	367

## 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

FLA Code Element	Number of Violations
Compensation (C)	2
Employment Relationship (ER)	16
Freedom Of Association And Collective Bargaining (FOA)	1
Health, Safety And Environment (HSE)	17
Hours Of Work (HOW)	2
Nondiscrimination (ND)	1

## Assessment Information

Assessor	Insync
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Assessment Date	13 Jun 2023
Assessment Purpose	Factory Assessment (In-Person)

## ASSESSMENT RESULTS

### Compensation (C)

Benchmark ID	C.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning the payment of compensation to workers.
Finding Details	1. The factory pays the social security contribution for only 128 out of 300 eligible workers. These 128 workers are those who have worked at the factory for over a year. The factory plans to pay for all workers in a phased manner. 2. The factory pays the old age benefits contribution for only 249 out of 384 employees. 3. The factory pays wages for all employee in cash instead of via direct bank transfer, as legally required. 4. The factory's group life insurance policy covers only 246 out 300 eligible workers.
Recommendation for Immediate Action	1. Ensure that 100% of workers are covered by social security contributions and benefits. 2. Ensure that 100% of workers are covered by the old age benefits. 3. Pay all employee wages via direct transfers to workers' bank accounts, as required by law. 4. Ensure that 100% of eligible workers are covered by the factory's group life insurance policy.
Compliance Classifications	Immediate Action Required

Local Law	<p>1.The Sindh Employees Social Security Act 2016, Section 20. Amount and payment of contributions. (1) Subject to the other provisions of this Chapter, the employer shall, in respect of every employee, whether employed by him directly or through any other person pay to the Institution a contribution at such times, at the rate of six per cent and subject to such conditions as may be prescribed. 2. Employees Old age Benefits Act 1976 Section 3. Compulsory Insurance. All employees in an industry or establishment shall be insured in the manner prescribed by or under EOBI Act. 3. Minimum wages notification issued under section 6 (1) of the Sindh Minimum Wage Act 2015 on 28th April 2023- All industrial/ Commercial and other establishments registered under any law, shall pay wages to employees through cross cheque / bank transfer. 4. The Sind Terms of Employment (Standing Orders) Act 2015. SO. 12. Compulsory Group Life Insurance (1) In every industrial establishment and commercial establishment, in which twenty or more workers are employed, the employer shall have all the permanent workers employed by him insured against natural death and disability and death and injury arising out of contingencies not covered by the Workmen’s’ Compensation Act.</p>
Benchmark ID	C.2
Benchmark Details	Employers shall pay workers at least the legal minimum wage or the prevailing industry wage, whichever is higher, for regular working hours (not including overtime). Workers should also be informed about the legal minimum wage.
Finding Details	<p>Minimum wages in Pakistan's Sindh Province were revised and published in April 2023. This change is retroactive to Jan. 1, 2023. (1) Out of a total of 29 workers in the factory's checking section, 20 are paid PKR.25000 per month and 9 are paid PKR.25850 per month. The minimum wage as defined by the local government for this position is PKR.26000. The assistant store in-charge is paid a wage of PKR.25000. The defined minimum wage for this position is PKR. 27884 per month. (2) In the month of May 2023, the 16 sampled sewing machine operators earn a piece rate, earned between PKR.27052 and PKR 27614 for the month. The minimum wage for this position, however, is PKR.27884 per month. The factory did not make additional payment to workers to cover the difference. (3) Overall, factory management has not implemented the new minimum wages published in April 2023.</p>

Recommendation for Immediate Action	Implement the applicable minimum wages, as defined by relevant local law, for all workers. Ensure to pay all workers proper minimum wages, including by making retroactive payments for January-April 2023.
Compliance Classifications	Immediate Action Required
Local Law	Minimum wages notification issued under section 6 (1) of the Sindh Minimum Wage Act 2015 on 28th April 2023.

### 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	(1) Although responsibilities for human resource aspects (recruitment, compensation, nondiscrimination, termination and grievance) are assigned to the factory's HR team as a whole, specific responsibilities are not included in the job description of HR and Compliance personnel. (2) Responsibilities related to health & safety are assigned to the factory's Health & Safety officer. Responsibilities related to environment are not defined.
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	The assessment found that managers and supervisors have some awareness of the workplace disciplinary system, but are not fully aware of its contents.
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	The factory does not provide any specific training to relevant supervisors on FLA's code elements or employment functions.
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	The factory's grievance procedure does not define a grievance resolution mechanism.
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 factory does not have a written procedure on recruitment. (2) The factory does not have a written procedure on nondiscrimination. (3) The factory does not have a written procedure on forced labor. (4) The factory does not have a written procedure on termination and retrenchment. (5) The factory does not have a written procedure on compensation.
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	The factory's disciplinary action system begins with a show cause notice. There is no verbal or written warning step in the process which should be taken prior to issuing show cause notice.
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	Factory does not have policy and procedure for 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) The factory does not have a policy or procedure on worker performance reviews. (2) The factory does not have a performance review system. The factory does not conduct any worker performance reviews.
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	The factory does not have a written policy or procedures on demotions and job reassignments.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.4
Benchmark Details	Employers shall inform workers about workplace rules, environmental protection systems, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas.

Finding Details	(1) The factory does not provide any ongoing communication to workers about the FLA code elements and employment functions. (2) The factory does not communicate the FLA code of conduct or company code of conduct to workers.
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	(1) The factory does not have the FLA member company's written workplace code of conduct. (2) The factory does not have any apprentice workers. Local law requires employers to train a certain number of apprentices. (3) The factory does not employ any disabled workers. Local law requires employers to hire a certain number of disabled persons.
Recommendation for Immediate Action	(1) Obtain and implement the FLA member company's workplace code of conduct. Post the code prominently in the workforce's language/s. (2) Ensure that apprentices are employed in the factory, per local law. (3) Ensure that disabled persons are provided with employment opportunities, per local law.
Compliance Classifications	Immediate Action Required

Local Law	1. Apprenticeship Ordinance 1962, Section 4. Obligation of employers: Subject to the other provisions of this Ordinance and the rules, an employer-(3) shall train apprentices in the proportion of a minimum of twenty per cent of the total number of persons employed in apprentice able trades, on an average in his undertaking, or in such other proportion as the competent authority may, by order in writing, determine in respect of his undertaking. 2. The Sindh differently able persons (employment, rehabilitation and welfare) Act 2014. Section. 8. Establishment to employ differently able persons. Not less than two percent of the total number of the persons employed by an establishment at any time shall be differently able persons whose names have been registered with the Employment Exchange or the District Officer Social Welfare of the area in which such establishment is located.
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 factory does not provide orientation training to new workers on FLA code elements or on the member company's code of conduct.
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	(1) The factory does not have a policy or procedure for periodic review of its written policies/procedures. The factory does not review its written policies/procedures. Most of the factory's written policies and procedures do not have an identification code, version number, or review and approval dates. (2) Workers are not consulted in decision-making processes related to their working conditions and policy formulations.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
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 factory's disciplinary action procedures do not specify the procedure for workers to appeal decisions.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.17.2
Benchmark Details	There shall be a mechanism that allows workers to report harassment and grievances confidentially, including any concerns or problems they may be experiencing around legally owed payments during a retrenchment process.

Finding Details	Worker complaint boxes are provided in the restrooms, but management does not maintain a log of opening the boxes and there is no evidence available to verify if any complaints have been collected, logged and addressed. Therefore, the assessment could not verify the effectiveness of the confidential grievance reporting system.
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	The factory does not maintain any documentation (such as attendance sheets or training materials) of orientation programs. Factory management explained that factory rules and regulations are communicated verbally. Workers also receive employee handbooks, but the factory does not maintain records of workers receiving handbooks. In interviews, workers confirmed receiving the handbooks. The assessment reviewed the contents of the handbook and noted that the handbook does not include information on the factory's grievance system.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
<b>Freedom Of Association And Collective Bargaining (FOA)</b>	
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 factory's Worker Management Council (WMC) meets quarterly, but the WMC does not discuss productivity-related matters. Local law requires WMCs to look into productivity-related matters.
Recommendation for Immediate Action	Ensure productivity related matters are included in discussions in the Worker Management Council meetings.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Industrial Relations Act 2013. Section 29, (5) The Council shall function for securing and preserving good labour management relation and shall look after the following matters (i) improvement in production, productivity and efficiency; (ii) fixation of job and piece-rates; (iii) planned regrouping or transfer of the workers.

### Health, Safety And Environment (HSE)

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	The assessment observed that approximately 50% of the floor markings indicating exit routes in the sewing, finishing, and packing departments were faded.
Recommendation for Immediate Action	Keep all floor markings indicating exit routes are prominently visible at all times.

Compliance Classifications	Immediate Action Required
Local Law	Sindh Factories Act 2015 Section 29. (4) In every factory, every window, door or other exit affording means of escape in case of fire, other than means of exit in ordinary use, shall be distinctively marked in a language understood by the majority of the workers and in red letters of adequate size or by some other effective and clearly understood sign.
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 a fire alarm system installed. During the assessment, however, two fire alarm points (one each in the sewing and packing sections) were tested at random and found to be not functional. In addition, the fire alarm panel located in the security guards' room was indicating "general fault."
Recommendation for Immediate Action	Ensure that fire alarms are functional at all times.
Compliance Classifications	Immediate Action Required
Local Law	The Occupational Safety & Health Rules 2019. Section (J) In every factory or workplace a mechanically or electrically operated fire alarm shall be fixed and where this is not possible a fire bell shall be provided to give alarm in case of fire.
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	In the sewing section on the ground floor, one out of four evacuation routes was blocked with tables. In the sewing section on the first floor, two out of four evacuation routes were blocked with stools. In the finishing section on the first floor, one out of three evacuation routes was blocked with packed cartons.
Recommendation for Immediate Action	Keep all evacuation routes clear at all times.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Factories Act 2015, Chapter III. Health & Safety Section 29. Precautions in case of fire (1) Every factory shall be provided with such means of escape in case of fire as may be prescribed; (6) A free passage-way giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the factory.
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. Diesel used in power generator was kept in containers with no secondary containment provided. 2. A container with thinner chemical (used for wall painting purpose) was found in workers dining area without any identification/label. (Isolated case)
Recommendation for Immediate Action	1. Ensure secondary containment is provided for Diesel containers. 2. Ensure containers with chemicals are stored in designated areas and are labelled.
Compliance Classifications	Immediate Action Required

Local Law	1.The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace. 2.Hazardous substance Rules 2014; Rule # 9. Packing & Labelling (2) The following information shall be printed conspicuously, legibly and indelibly on every container of a hazardous substance:-(a)name of the hazardous substance.
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 assessment observed multiple areas with improperly stored waste, including wood debris near the electric generator, corrugated cartons in the sewing section on the 1st floor, and rejected garments in the finishing section on the 1st floor. (2) The washrooms in the sewing sections on the 1st and 2nd floor and in the packing department on the 2nd floor were not properly cleaned. The assessment observed stains from chewing tobacco on corners of the walls and on the floor; 3 out of 7 water taps are not functioning on the ground floor and 2 out of 2 not functioning on the 2nd floor; and multiple toilets (2 out of 8 on ground floor, 1 out 4 on 1st floor and 1 out 2 on 2nd floor) are not functioning. (3) The men's restrooms in the packing and finishing departments were missing soap and hand drying facilities.
Recommendation for Immediate Action	(1) Store all waste and debris in proper designated locations. (2) Keep washrooms functional and clean at all times. (3) Ensure that soap and hand drying facilities are available in toilets at all times.
Compliance Classifications	Immediate Action Required

Local Law	1. The Sindh Occupational safety & health rules 2019 Section 8. (1) No rubbish, filth or debris shall be allowed to accumulate or to remain in any part of a factory or workplace in such position that effluvia therefrom can arise within the factory or workplace. 2.The Sindh factories rules 2021. Rule 44. All latrines shall be cleaned daily and kept in a strict sanitary condition. 3.The Sindh Factories Rules 2021. Rule 43 ( c) Soap and towel shall be provided and kept available for workers free of cost at every wash basin
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	(1) The assessment observed that a limit switch on the factory's cargo lift (capacity 1000kg) was not functional when the lift was in use. (2) The factory uses two cargo lifts and provided certificates of inspection dated January 4, 2023; however, the inspector's certification documents were not available for review. Therefore, the assessment could not fully verify that the factory properly inspects the lifts. (3) The factory has a lockout-tagout procedure written in English. In practice, the factory does not implement a lockout-tagout system.
Recommendation for Immediate Action	(1) Ensure that the limit switch of the cargo lift (capacity 1000kg) is functional at all times when lift is in operation. (2) Maintain certification documents of inspectors who conduct required machinery inspections. (3) Implement a lockout-tagout system.
Compliance Classifications	Immediate Action Required

Local Law	<p>1.The Sindh Occupational Safety &amp; Health Rules 2019, Section (N) 4. The cage of a hoist or lift shall be fitted with efficient interlocking or other devices to ensure that the cage cannot be opened except when the cage or platform is at the landing and that the cage or platform cannot be moved away from the landing until the cage is closed. 2.The Sindh Occupational Safety &amp; Health Rules 2019, Section (N) 2. Every hoist, lift or any other lifting machine shall be thoroughly examined every three months by a person authorized by the Chief Occupational Safety and Health Inspector. A register shall be maintained for every examination of a lifting machine containing the following particulars. 3.The Sindh Occupational Safety &amp; health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace.</p>
Benchmark ID	HSE.6.1
Benchmark Details	<p>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.</p>
Finding Details	<p>(1) The assessment observed a 40-kg portable fire cylinder mounted on a trolley near the electric generator without the appropriate markings. Factory management explained that the fire cylinder is out of order and not functional. (2) The assessment observed multiple fire extinguishers that were not fully accessible. (a) 1 extinguisher in the sewing sections on the 1st and 2nd floors was partially blocked with cut fabric panels and tables (b) 1 extinguisher in the finishing section on the 1st floor was partially blocked with a trolley. (c) 1 extinguisher in the packing section on the 2nd floor was partially blocked with semi-finished goods. (3) The factory's trained firefighters are not provided with any breathing apparatuses. Safety shoes, helmets, and gloves are available for only 7 out of 18 fire fighters.</p>
Recommendation for Immediate Action	<p>(1) Ensure that the portable fire cylinders are functional at all times. (2) Keep fire extinguishers unobstructed and accessible at all times. (3) Provide firefighters with sufficient breathing apparatuses, safety shoes, helmets, and gloves.</p>

Compliance Classifications	Immediate Action Required
Local Law	1.Sindh Factories Rules 2021. Rule # 59. All apparatus for extinguishing fires shall be kept in good order and shall be periodically examined and tested after every two months. 2. Sindh Factories Rules 2021. Rule # 59. All apparatus for extinguishing fires shall be kept in good order and shall be periodically examined and tested after every two months. 3. The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace.
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) The factory's health and safety risk assessment, conducted on January 3, 2023, does not cover the cargo lift, warehouse, and eating area. (2) On the rooftop of the factory (located above the 2nd floor), the factory has installed a finished goods warehouse. This addition is not included in the approved building map or the building stability certificate. (3) The solid waste storage area near the electric generator is not secure and protected. (4) A canteen facility is not provided in the factory, although it is a legal requirement.
Recommendation for Immediate Action	(1) Ensure that all potential risks, including those related to the cargo lift, warehouse, and eating area, are covered in health and safety risk assessments. (2) Obtain approval for all additional construction activity in the factory. Update approval plans and stability certificates for new additions, including the finished goods warehouse. (3) Store solid wastes in a secured manner. (4) Provide a canteen facility for workers.
Compliance Classifications	Immediate Action Required

Local Law	<p>1. The Sindh Occupational Safety &amp; Health Act 2017, Section 4. General Duties of Employer (2) Every employer shall inter-alia ensure that there exists effective methods for -(a) systematically identifying existing hazards to workers at work; and (b) systematically identifying (if possible before, and otherwise as, they arise) new hazards to workers at workplace; and (c) regularly assessing each hazard identified, and determining whether or not it is a significant hazard. 2.The Sindh Occupational Safety &amp; Health Rules 2019 (X) 9. Every person who intends to construct a factory or workplace or a factory or workplace or to alter or add to any existing factory or workplace building shall, submit drawing in blue prints or white prints of the intended premises to the Chief Occupational Safety and Health Inspector. 3.The Sindh Occupational safety &amp; health rules 2019 Section 8. (1) No rubbish, filth or debris shall be allowed to accumulate or to remain in any part of a factory or workplace in such position that effluvia therefrom can arise within the factory or workplace. 4.The Sindh Factories Rules 2021. Rule 51. The occupier of every factory wherein more than 200 workers are employed shall provide near or in the factory a canteen according to the standard prescribed in the Sindh factories rules.</p>
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 any safety information to external contractors who visit the factory for construction or other maintenance work.
Recommendation for Immediate Action	Provide safety information to all external contractors who visit the factory for construction or other maintenance work.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace;

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 opening to the confined space has a metal cover with no locking system to prevent unauthorized entry or accidents. There is neither a fence nor warning signs near confined spaces to warn workers. (2) The factory does not have a safety procedure in place for entering confined spaces. Persons must enter the underground room to inspect fire pumps and generators. The underground water tank was not cleaned during the period of time reviewed by the assessment. Factory management explained that the tank was never cleaned in the past and therefore there were no safety precautions to be followed. (3) The factory does not provide harnesses to electricians when they work at heights. (4) There is no protective fencing, grill, or barrier on the sides of the walkway to the security post near the main gate of the factory. The walkway is 10 feet above ground level.
Recommendation for Immediate Action	(1) Install a locking system, fence, and signs near confined spaces to prevent unauthorized entry and accidents. (2) Implement a safety procedure is in place for entering confined spaces. (3) Provide harnesses to electricians when they work at heights. (4) Install a fencing, grill, or barrier on both sides of the elevated walkway.
Compliance Classifications	Immediate Action Required

Local Law	<p>1. Factories Act, 1934- Section 33-E(1): In every factory, every fixed vessel, sump, tank pit or opening in the ground or in floor which by reason of its depth, situation, construction or contents, is or may be a source of danger, shall be either securely covered or securely fenced. 2. The Occupational Safety &amp; Health Rules, Section D (k) Workers entering a sewer, flue, duct, or other similarly confined places shall be provided and required to wear safety belts with life lines attached and held by another person stationed at the opening ready to respond to agreed signals. 3. The Sindh Occupational safety &amp; Health Act 2017 Section 4. General duties of employer (h) provide for the workers, where necessary, when hazards cannot be otherwise eliminated or controlled, adequate protective clothing and protective equipment of a type approved by Government, to prevent every risk of injury and of adverse effects on health. 4.The Factories Act 2015 Section 21. (c) all places of work from which a worker may be liable to fall a distance exceeding three feet and six inches shall be provided with fencing or other suitable safeguards; and Factory does not provide any safety information to external contractors while they arrive in the factory for construction or other work.</p>
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, only 129 out of 367 workers received training on ergonomics and lifting techniques. The last such training was conducted on December 21, 2022. Factory management explained that they have a plan to train the remaining workers starting June 21, 2023.
Recommendation for Immediate Action	Ensure training on ergonomics and on lifting techniques is conducted for all workers.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace



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 does not take any steps for maintenance on fall protection equipment.
Recommendation for Immediate Action	Regularly and adequately maintain fall protection equipment.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace.
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 assessment observed two out of five cutting workers not using mesh gloves while they were cutting fabric. The assessment also observed approx. 50% of overlock machine operators not using face masks and eye guards when operating the machines. (2) In the past 12 months, only 151 out 367 workers received training on use of PPE. The last such training was conducted on December 21, 2022. No subsequent training was conducted until May 2023. Factory management explained that they have a plan to train the remaining workers starting June 21, 2023.

Recommendation for Immediate Action	(1) Ensure that cutting workers use mesh gloves and that overlock machine operators use face masks and eye guards. (2) Ensure that all workers are provided training on use of PPE.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Occupational safety & Health Act 2017 Section 4. General duties of employer (h) provide for the workers, where necessary, when hazards cannot be otherwise eliminated or controlled, adequate protective clothing and protective equipment of a type approved by Government, to prevent every risk of injury and of adverse effects on health.
Benchmark ID	HSE.5.2
Benchmark Details	Workers shall be trained in evacuation procedures.
Finding Details	The factory does not provide training related to emergency events such as earthquakes.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	HSE.16
Benchmark Details	Workers shall not suffer any negative consequences for refusing to work with machinery, equipment or tools that are not properly guarded or reasonably considered unsafe.
Finding Details	The factory does not communicate to workers their right to refuse to perform work under unsafe working conditions. In interviews, workers expressed that they had no complaints in this regard and that they feel they can refuse to work under unsafe conditions.
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement 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) The factory does not provide any training for workers operating vehicles. In the past 12 months, only 151 out 367 workers received training on operating machinery. The last such training was conducted on December 21, 2022 and no subsequent training was conducted until May 2023. The factory has a plan to train the rest of the workers starting June 21, 2023. These basic trainings are conducted in the work areas. (2) The factory trains relevant workers on electrical safety; however, the factory has not trained other workers with high-risk responsibilities (lockout-tagout, confined space, work at heights).
Recommendation for Immediate Action	(1) Ensure that all workers are trained on safe use of machines. (2) Provide training to workers with high-risk responsibilities (lockout-tagout, confined space, working at heights).
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace
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) Approx. 80% of sewing machine operators do not have seats with a backrest. Workers performing standing jobs were not provided anti-fatigue mats. Factory management explained that they have a plan to provide seats with backrests and anti-fatigue mats for all workers within 3 months. (2) Work stations are not adjustable in height to suit the height of workers.
Recommendation for Immediate Action	(1) Provide all workers with proper seats and/or anti-fatigue mats, as appropriate to their job functions. (2) Ensure that workstations are adjustable in height.
Compliance Classifications	Immediate Action Required
Local Law	The Sindh Occupational Safety & health Act 2017. Section 4. General Duties of employer (d) make arrangements to control and prevent physical, chemical, biological, radiological, ergonomic, psychosocial or any other hazards that affect the safety and health of workers and other persons at workplace

### 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 factory does not have written procedure on hours of work.
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	Factory management does not inform workers of overtime requirements prior to the start of their shifts. Workers are informed of overtime requirements after the lunch break on the same day.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

### **Nondiscrimination (ND)**

Benchmark ID	ND.12
Benchmark Details	Employers shall take measures to reasonably accommodate workers with (chronic) illnesses, including HIV/AIDS-related illnesses, which could include rearrangement of working time, the provision of special equipment, opportunities for rest breaks, time-off for medical appointments, flexible sick leave, part-time work and return-to-work arrangements.
Finding Details	The factory does not have records of workers with chronic illnesses who may require accommodations.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

