

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

13 Jun 2023



Factory Information

FLA Affiliates	Fast Retailing Co., Ltd.
Country	Bangladesh
Number of Workers	2512

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)	7
Harassment Or Abuse (H/A)	2
Health, Safety And Environment (HSE)	17
Hours Of Work (HOW)	3
Nondiscrimination (ND)	1

Assessment Information

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

ASSESSMENT RESULTS

Compensation (C)

Benchmark ID	C.3.1.3
Benchmark Details	Where probationary employment is legally allowed, no workers shall work more than three months in this employment category.
Finding Details	Based on reviewing the appointment letter and personnel file of probationary worker, it was noted that the facility has extended probation period for another three months which resulted in the probationary period longer than 3 months. For instance, worker A, a junior operator, joined on July 18, 2022 and supposed to get confirmation as regular worker on October 18, 2022. She only got confirmed on December 26, 2022.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Employment Relationship (ER)

Benchmark ID	ER.17.5
Benchmark Details	Employers shall have in place procedures to track the number, types, and timing and resolution of grievances, and to communicate the resolution of grievances to the workforce.
Finding Details	Based on document review it was noted that the factory has procedures to track the number, type, and timing and resolution of grievances but there is no procedure in place to communicate the resolution of grievances to the workforce.

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	From Management interview, it was noted that the facility does not provide training to workers on all FLA's Code elements and Employment functions, only working hours, compensation, health & safety and environmental are covered.
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	It was noted that managers and supervisors were not fully aware of the workplace disciplinary system. Ten out of Fifteen managers and supervisors interviewed had very limited knowledge in this aspect. For instance, they were not aware of any types of misconducts, the disciplinary action process, the inquiry process and the disciplinary actions against different misconducts.

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	Based on management interview, it was noted that the facility provided specific training to the supervisors, however, it did not cover all FLA's Code elements and Employment functions as only harassment or abuse, hours of work, freedom of association, collective bargaining, health and safety, environment were covered.
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	Based on document review it was noted that the factory established the procedures to track the number, types, and timing and resolution of grievances. However, there were no procedure in place as to how the facility will communicate the resolution of grievances to the workers.

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	Based on management interview, the facility did not communicate to workers on the FLA's code elements or Employment functions to workers. Based on site tour and management interview, No FLA code was posted out at the factory.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement 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	Based on reviewing orientation training module, it was noted that the orientation training to new workers did not cover all FLA's Code elements and Employment Functions. The orientation training covered only hours of work and compensation.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Harassment Or Abuse (H/A)

Benchmark ID	H/A.10.1.2
Benchmark Details	Body searches and physical pat downs shall only be undertaken when there is a specific, legitimate reason to do so and upon consent of workers, unless a state official with the power to do so (e.g. police officer) has ordered the search.
Finding Details	a) Based on document review and workers interview, it was noted that the facility did not get workers' consent before body searches. b) Male workers body search conducted every day at the time leaving from the factory at every day as a regular practice.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	H/A.10.1.3
Benchmark Details	Body searches shall not be undertaken in public and the person who undertakes the search shall be of the same sex as the person who is being searched.

Finding Details	On the audit day, it was noticed that body search was carried out for all male workers by same sex security personnel in an open area without ensuring their privacy.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

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	<p>1. There is no portable dry chemical powder, Co2 and foam fire extinguisher with capacity of 25 kilogram provided in the boiler room. The facility provided only foam fire extinguisher with capacity of 9 kilogram and Co2 fire extinguisher with capacity of 3 kilogram at the boiler room. 2. There is no portable foam, Co2 fire extinguisher with capacity of 25 kilogram provided in the generator room. 3. There is no portable dry chemical powder and foam of fire extinguishers with capacity of 25 kilogram provided at the electrical sub-station, transformer room. 4. There is only one exit provided at the training room where more than 40 people can sit at a time. 5. No exit sign posted at least 16 designated exits, such as two exits of finishing section office on 3rd floor and two exits of finishing section office on the 2nd floor. 6. Two out two exits of accessories-sub-store open inwardly instead of outwardly where more than 10 people work in this area. 7. There is no evacuation plan posted at the boiler room, compressor room, wastage room, pilot run section and accessories sub-store. 8. There is no assembly point and directional sign towards the assembly point on the evacuation plan throughout the facility. 9. One evacuation plan was obstructed by the finished goods carton at the finished goods warehouse. 10. There is no exit arrow marking or exit direction sign to show the direction towards the main exit provided at least 4 passageways of finished goods warehouse at the mezzanine floor and two passages ways at dining hall. One aisle floor marking of pilot run section and one aisle floor marking of finished goods warehouse were found faded.</p>
Recommendation for Immediate Action	<p>1. Facility shall provide portable Dry chemical powder type, Co2 type and foam type fire extinguisher with capacity of 25 kilogram at the Boiler room, Generator room and the electrical sub-station room in order to comply with law. 2. Factory shall provide another exit at the training room. Factory shall install exit sign at all required designated exits. 3. Factory shall provide outwardly open exit door at all required areas. 4. Factory shall post evacuation plan at all required areas. Evacuation plot plan shall include the assembly point and directional sign to indicate route toward the assembly point. 5. Factory shall provide exit directional arrow marking or exit sign at all passage ways to indicate the direction toward the main exit and shall re-paint all faded floor marking on the aisles.</p>
Compliance Classifications	Immediate Action Required

Local Law	<p>In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 4: The factory where there is a possibility of fire incident from the electrical appliances, the fire extinguisher of the capacity mentioned in the sub-rule (2) should be installed and that should be made of Carbon di-oxide, dry chemical powder or similar materials and Boiler room, generator room, electrical main sub-station room shall have trolley system foam type, dry chemical powder (A, B and C type) and carbon dioxide type fire extinguishers with a capacity of at least 25 kg. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 2: Each room of the factory building where more than 20 workers are engaged, there will be at least two exits in that case and these exits should be located in such way so that every person can reach with ease and without interruption from the workplace to the exit. (2) Such exits won't be located more than fifty meters off from the workplace of the workers and these won't be less than 1.15 meters in width and 2.00 meters in height. In accordance with Bangladesh National Building Code 2020, part 4, chapter 3, section 3.16, sub-section 3.16.1: All required means of exit or exit access in buildings or areas requiring more than one exit shall be signposted. The signs shall be clearly visible at all times, where necessary supplemented by directional signs. All exit doors shall be clearly marked for easy identification. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 5: The means of exit from any room in every establishment shall not be locked or fastened so that it can be opened immediately from the inside by a person working inside the room unless these are of the sliding type. All such doors shall be so constructed as to open outwards. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 8: The arrangement should be made to show evacuation plan of exit in one or more places easily visible in each floor of each floor of the factory. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub-section e: Aisles and egress routes must be marked with arrows in such colors as to be easily visible in dark and smoky condition</p>
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	There is no assessment conducted after the fire drill 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	No back up battery/power for exit lighting at the facility. Hence, when power shut down then exit lighting were found not functioning and not illuminated.
Recommendation for Immediate Action	Facility shall install back up battery/ power for exit lighting at the facility.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with RSC Technical guideline 3.6.5.1: Existing battery-operated or uninterruptible power supply systems can be continued to be used to supply exit signs and means of egress illumination where monthly testing of such systems is conducted and properly documented.
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	1. Workers evacuation passage ways found partially obstructed by goods, co-workers, sitting arrangement and pillar such as the passage ways at finishing section, sewing section, pilot run section, and packing section. 2. The drinking water stations at the stairs platform of at least four stairs and exits were partially obstructed, such as the stairs at the back side of the shed building. 3. One aisle between pilot run section and the office (production, quality, meeting room, training room) was partially obstructed with the exit door of open pilot run section opened.
Recommendation for Immediate Action	Facility shall ensure aisles, passageways, exit & stairs are free from obstruction for each evacuation during emergency.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub-section B: Have to ensure safe walkways / aisles as far as possible for traveling to the place where any worker has to work at any time C: The walkways and stairs of the workplace should be clean, wide and free of obstructions In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 14: a free passage-way giving access to each means of escape in case of fire and emergency 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	The facility posted safety label for chemicals (Photo Emulsion, Mobil, Diesel) in English language instead of the local language
Recommendation for Immediate Action	The facility shall post safety label of all chemicals in local language for easy understanding of workers.
Compliance Classifications	Immediate Action Required

Local Law	In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (k): to take effective precautionary measures in case of bodily injury, poisoning or diseases for any person employed thereto.
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	It was noted that there was no bin with cover provided at all female toilets of the 1st floor, 2nd floor and 3rd floor of the production building and the shed building for sanitary napkin disposal.
Recommendation for Immediate Action	It is recommended that the facility shall provide bins with covers at the female toilet.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, Schedule 1, Rules 48, section 3, sub-section 5: Have to keep a covered waste bin inside of the each toilet designated for female and have to clean it every day.
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	Based on factory tour, it was noted that there was no industrial grade emergency light or fog light installed in the following locations: 1) All three staircases of production building ; 2) Five staircases of shed building; 3) Three main exits of production building; 4) Five exits of shed buildings.
Recommendation for Immediate Action	Facility shall install industrial grade emergency light/ fog light at all staircases, exits and emergency exits.

Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub-section f: Have to install battery-oriented fog light or emergency light at all stair, exit and emergency exit which will run when no power or electricity is available.
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1. Traffic lane and walk path were not clearly marked at the entrance, the exit gate and inside of the factory premises where vehicles move. 2. Only one side of staircase from ground floor to first floor of the shed building is equipped with a handrail given that the staircase is 48 inches wide. 3. No stopper or brake is installed in at least 24 moving trolley for controlling the speed of the moving trolley. 4. At least 10% eye shield installed were not being used and the 20% of needle guards on high speed machines were installed too high which defeat the purpose of safety measure.
Recommendation for Immediate Action	Facility shall clearly mark traffic lane & walk path. Provide handrail at both sides of the staircases. Brake and stoppers shall be available on wheel of the moving trolleys. Refreshment training shall be provided to workers on properly usages of safety guard.
Compliance Classifications	Immediate Action Required
Local Law	In Accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub- section a: All floor, stair, walkways have to build durably and have to preservation properly and to ensure safety have to arrange durable railing / handrail if need and have to keep obstacle free all aisles/ walkways and stair on working hours In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (f): to ensure safety measures of the machinery and equipment's during the time of use or remaining in other condition.
Benchmark ID	HSE.6.1

Benchmark Details	All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers.
Finding Details	Fire extinguishers installed at the finished goods warehouse at the ground floor and the mezzanine floor of the production building are insufficient. The total areas of finished goods warehouse is at 3725.65 M ² . As per Bangladesh EPZ Labor Rules 2022, Chapter 4, Section 45, Sub-section 2, that the area requires total 41 fire extinguishers. However, the facility installed only 10 fire extinguishers in the finished goods warehouse. The facility installed a sprinkler system for the entire finished goods warehouse.
Recommendation for Immediate Action	The facility shall install sufficient fire extinguisher at the finished goods warehouse as per legal requirement.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 2: In the factory with the floor area more than 90 square meter and where fire incident can occur from other combustible objects except the combustible liquid, electric equipment's and combustible metals, a dry chemical powder fire extinguisher or such kind of portable fire extinguisher should be installed for each additional 90 square meter of the designated bucket mentioned in the sub-rule (1).
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	The facility has four compressors, but no hydraulic test of compressor vessels is conducted by a competent personnel or authority.

Recommendation for Immediate Action	Hydraulic test of compressor vessels should be conducted by the competent personnel or organization.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 84, Sub-section 1 (GHA) : Following test should be done by the competent personnel: (A) For ensure the general condition of the vessel and the effectiveness of its fittings, external part should be tested once in every six month; (B) Should be tested once in a year inner side, inside of vessel and outside wall, effectiveness of the seam's and spares parts of vessel and the fault of seroson. But, provided that, if it is not possible to check the inner part for the vessel due to construction problem, in that case Hydraulic test should be done once in every two years.
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
Finding Details	Based on the site tour, it was noted that the facility did not update occupant load plan on daily basis. The facility the latest update of occupant load plan was done on either on February 9, 2021 or May 24, 2022 (illegible due to poor handwriting). In addition, the facility does not keep safety record book and there is no safety notice board at the workplace.
Recommendation for Immediate Action	Facility shall update occupant load plan daily as per legal requirement, shall prepare safety record book and shall provide safety notice board at the workplace.
Compliance Classifications	Immediate Action Required

Local Law	<p>In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 72, sub-section 3: If the Additional Inspector General requests any owner by written order, the said owner shall hang a notice regarding the maximum number of workers who can work in accordance with these rules in each workplace of his establishment.</p> <p>In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 50, Sub-section 1: In order to fulfill the purpose of Section 35 (2) (10) of the Act, every factory or establishment shall maintain a safety record book and display a safety information board as per Form 24.</p> <p>In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 50, Sub-section 2: following data and information must be preserved in the Safety Record Book of each factory or industry unit and the book has to be shown to the Inspector if the same is sought by him/her: a) List of equipment's and chemical products that might pose severe health hazard or risk; b) Preventive measures taken against hazardous products, possible effects of them upon the health of the workers and the arrangement of primary aid; c) Description of personal protection instruments preserved for workers and details about the instruments used by the workers; d) Complete list of instruments; e) The date on which fire drill was conducted and the number of participants in it; f) Date of refilling the fire-extinguishing instruments and containers; g) Information about the electrical wiring and the tests conducted about the usefulness of the instruments; h) List of the members of safety committee and the date of arranging training related therewith and the number of trainees in it; i) And other types of data related with safety that is taken by the Owner.</p>
Benchmark ID	HSE.3.1
Benchmark Details	Employers shall notify the relevant national and/or local authorities of all illnesses and accidents and environmental emergencies as required by applicable laws.
Finding Details	It was noted that the facility did not submit injury register or workplace injury report to the Export Processing Zone as required.
Recommendation for Immediate Action	Facility shall submit injury register or workplace injury report to the Export Processing Zone.
Compliance Classifications	Immediate Action Required

Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 95: 1) Every factory management should preserve record of every accident or dangerous incident occurred of his organization in a register as per form 35 and should clearly mention the remedial measures have taken by the management. 2) The owner shall send a copy of the information kept in the register under sub-rule 1 and the statement written in the said register to the Additional Inspector General within 15 working days after 31st December every year.
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	Based on reviewed MSDS, it was noted that the facility posted MSDS of chemicals (STABREX® ST40, NALCO® 90001, MAXITREAT 22045, OPTIMER® 9901, NALCO® 8338, NALCO® 39M, WD 40 and Silika Gum) in English language instead of the native language.
Recommendation for Immediate Action	The facility shall post MSDS in the local language for easy understanding of workers.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 90, Sub-section 10: Every owner shall display in a readily visible place in his establishment a written notice of proper precautions against the use of such chemical substances as may cause harm to the human body.
Benchmark ID	HSE.18.2
Benchmark Details	Medical staff shall be fully licensed and recognized under applicable national rules and regulations.

Finding Details	1. Based on management interview, there is no medical assistant and full-time doctor stationed at the medical center. The facility has appointed a part-time medical doctor who comes to the medical center three days weekly. 2. The facility has two medical nurses, but they are not registered at Bangladesh Nursing & Midwifery Council.
Recommendation for Immediate Action	1. Facility shall appoint medical assistant, a full-time doctor at the medical center 2. Facility shall appoint medical nurse who is registered at the Bangladesh Nursing & Midwifery Council.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 44, sub-section 2: At least one registered Physician shall be in each Treatment Unit of the institute or factory with the facility of dispensary. Additionally, at least one trained compounder or medical assistant, nurse and subordinate employee shall be employed for helping him/her, provided that at least two registered Physicians shall be recruited in case of an Institute where more than three thousand employees/workers work and necessary number of medical assistant and nurse shall be recruited for helping the Doctors : There is also a condition that if the workers of an organization work in three shifts, there will be a diploma certified medical assistant instead of a registered doctor in the night shift. In accordance with Bangladesh Nursing and Midwifery Council act 2016, section 21, sub-section 1: Notwithstanding anything contained in any other law, no person shall practice or hold out to be a nurse or midwife or allied profession without registration under this Act.
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	1. Based on site tour, it was noted that there is not drinking water station label in native language posted on at least five drinking water stations, such as production mending section and inspection room. 2. There is no test report of drinking water posted next to drinking water station throughout the facility.
Recommendation for Immediate Action	Facility shall post drinking water label in local language next to drinking water station and shall post drinking water test report next to all drinking water station.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 49, sub-section 3: Every water supply point should be clearly marked with words for drinking water in Bengali. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 49, sub-section 5: In case of the underground water or supplied in other way or tube well water, the owner should procure and preserve the certificate from public health engineering department of the government or any other organization approved by the government whether the water is free from arsenic and germs and drinkable or not at least four time in a year if directed by the inspector.
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. At least 15% of workers were working without wearing personal protective equipment in sewing and finishing section. 2. At least 10% of overlock machine operators were working without using head scarf to protect hair from dust. 3. At least 10% of longtime standing workers were working without using anti-fatigue mat at the finishing section. 4. 480 out of 2512 employees received training on PPE last year. Last batch of training provided was on May 3, 2023 and total participant were at 40.

Recommendation for Immediate Action	Facility shall enhance the training of PPE usage to workers and regular monitoring shall be carried out to ensure workers are using their PPEs appropriately.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (d): to provide appropriate protective dress and personal protective equipment's and safety appliances to the workers, free of cost to avoid any accident for using risky machinery, poisonous chemical or in any special cases; In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 69, Sub-section 3: Every person working in the dust-sand and Smokey place in the organization have to use mask. In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (c): to aware each worker about the hazard of the work through necessary instructions and training, as the case may be, in order to ensure the protection and safety of personal health in working place.
Benchmark ID	HSE.14.2
Benchmark Details	Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use.
Finding Details	Based on the management interview, only 240 out of 1700 machine operators received training on machine operating system last year. Last batch of training was provided on May 21, 2023 with a total of 40 participants.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Hours Of Work (HOW)

Benchmark ID	HOW.20
Benchmark Details	Employers shall have in place practices that conduct regular analysis of hours of work in their workplaces and procedures that demonstrate a commitment to progressively reducing excessive hours of work.
Finding Details	Based on the production plan, it was noted that the facility prepared production plan based on 8 to 10 hours a day. In November 2022, they prepared production plan sometimes based on 10 hours depending on the production orders.
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	Based on time card from June 2022 to June 13, 2023, it was noted that daily overtime was from 2 to 6 hours and daily working hours ranged from 10 to 14 hours. At least 80% of sampled workers worked more than 60 hours a week and maximum weekly working hours was at 84 hours such as: from August 20 to 25, 2022 with total weekly working hours were 74 hours; daily maximum overtime hours were 6 hours, from June 25 to July 1, 2022 with total weekly working hours were 84 hours.
Recommendation for Immediate Action	The facility shall adopt practice to ensure that workers do not work more than 60 hours.
Compliance Classifications	Immediate Action Required

Local Law	In accordance with Bangladesh EPZ Labor Act 2019, chapter 5, section 40: (1) No worker shall ordinarily work or be required to work in an enterprise for more than 48 (forty eight) hours in a week. (2) Subject to the provisions of section 45, a worker may work for more than 48 (forty eight) hours in a week: Provided that the total working hours of such worker shall not exceed 60 (sixty) hours in a week and on the average 56 (fifty six) hours per week in a year:
Benchmark ID	HOW.2
Benchmark Details	Workers shall be entitled to at least 24 consecutive hours of rest in every seven- day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following.
Finding Details	Based on provided time card from June 2022 to June 13, 2023, workers did not receive 24 consecutive hours of rest in every seven day period. The consecutive working days was found 11 to 13 days, such as from May 15 to 25, 2023 with total 11 days, from April 1 to 13, 2023 with total 13 days.
Recommendation for Immediate Action	The facility shall provide one off day after six consecutive working days.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Act 2019, chapter 5, section 41: Any worker employed in an enterprise shall be entitled to 1 (one) day holiday in a week and no deduction shall be made from his wages for such holiday.
Nondiscrimination (ND)	
Benchmark ID	ND.8.1

Benchmark Details	Employers shall abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities.
Finding Details	Given that a total of 1968 female employees working in the factory, no childcare center is provided by the facility. Therefore, female workers are deprived of the opportunity to keep child at the childcare center and breast feed the child.
Recommendation for Immediate Action	Facility shall arrange childcare center in order to meet the legal requirement.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 64, sub-section 1: In order to fulfill the purpose of section 35 (2)(10) of this Act, in such establishment where 40 or more women workers are employed, one or more suitable childcare rooms for children under 6 years of age shall be provided and maintained.

