

Fair Labor Association: Independent External Factory Assessment

Assessment Date :

14 Sep 2024



Factory Information

FLA Affiliates	alphabroder
Country	Bangladesh
Number of Workers	1011

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)	3
Employment Relationship (ER)	11
Freedom Of Association And Collective Bargaining (FOA)	1
Harassment Or Abuse (H/A)	2
Health, Safety And Environment (HSE)	17
Hours Of Work (HOW)	3

Assessment Information

Assessor	SCSA
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Assessment Date	14 Sep 2024
Assessment Purpose	Factory Assessment (In-Person)

ASSESSMENT RESULTS

Compensation (C)

Benchmark ID	C.25.2
Benchmark Details	Advances shall only be made following clearly established rules which have been communicated to workers.
Finding Details	The factory has not established a written policy and procedures/rules on wage advances.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
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	The factory has not conducted a contributory provident fund accounts audit since 2020.
Recommendation for Immediate Action	The factory shall conduct accounts audit of contributory provident fund by a recognized firm on a regular basis to comply with the law.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 12, section 278, sub-section 1: Shall be conducted accounts audit of provident fund as per the Company act 1994 every by a recognized audit firm.

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	The factory extended the probation period for some probationary workers. One worker joined on May 5, 2024, as a helper with a three-month probation period, and the probationary period was extended on August 5, 2024, for another three months. Another worker joined on March 21, 2024, with a three-month probation period, and the probation period was extended for another three months on June 21, 2024.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Employment Relationship (ER)

Benchmark ID	ER.19.2
Benchmark Details	All notices that are legally required to be posted in the workplace work areas shall be posted by employers.
Finding Details	The factory has not posted BEPZA minimum wage gazette 2023 in the workplace.
Recommendation for Immediate Action	Post BEPZA minimum wage gazette 2023 in the workplace.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 7, section 141, sub-section 4,5 & 6.

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	The social compliance staff at the factory do not have responsibility for managing Human Resources aspects (recruitment, compensation, nondiscrimination, termination, grievance, etc.)
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 factory provides training on the workplace disciplinary system to managers and supervisors. However, they are not fully familiar with the workplace disciplinary system as the awareness level of 8 out of 16 managers/supervisors is very low. They are not well aware of the types of misconduct, disciplinary action process, inquiry process, and disciplinary action.
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 has not developed a written policy and procedure on personnel development and child labor. 2. The factory has written policies on non-discrimination and termination/retrenchment. However, there are no procedures for those policies.
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 has established written policy on workplace conduct and discipline. However, it lacks of written procedure as per local laws.
Recommendation for Immediate Action	Factory shall establish the written procedure on workplace conduct and discipline in accordance with the prevailing legislation.
Compliance Classifications	Immediate Action Required
Local Law	Bangladesh EPZ Rules 2022, Chapter 2, section 23, 24, 25, 26 and 27.
Benchmark ID	ER.6.1

Benchmark Details	Employers shall have written policies and procedures and implement practices that encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to advance in their careers within the factory or beyond.
Finding Details	The factory has not established written policies and procedures on personnel development that encourage ongoing training with the goal of raising or broadening workers' skills so they can advance in their careers.
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	Workers do not have access to provide feedback regarding their performance evaluation. Additionally, the performance review form is prepared in English instead of the native language of the workers.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	
Benchmark ID	ER.8

Benchmark Details	Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements.
Finding Details	The factory has not established a written policy and procedure on promotion, demotion, and job reassignment.
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	The factory posted the FLA code of conduct in the English language instead of the native language of the 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) There are two sheds (828 square feet & 338 square feet respectively) for waste storage and another shed (378 square feet) for gas cylinder storage. However, the factory has not obtained any construction approval from Export Processing Zone authority for those storages. (2) The necessary information on a worker's identification card is provided in English language instead of Bengali language, and the ID card is not made based on form 8 of Bangladesh EPZ Labor Rules 2022.
Recommendation for Immediate Action	1. Factory shall obtain a construction approval plan for wastage & gas cylinder sheds & shall update it as a build drawing. 2. Factory shall provide necessary information on workers identification cards in Bengali language.
Compliance Classifications	Immediate Action Required
Local Law	1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 15, section 310, sub-section 1: In case of construction of any factory building or construction or alteration or extension of any other structure, prior approval of the authority shall be taken and In accordance with BNBC 2020; part-2, chapter-3, section 3.1: No building or structure regulated by this Code shall be erected, constructed, enlarged, altered, repaired, moved, improved, removed, converted or demolished without obtaining permit for each such work from the building official. 2. In accordance with Bangladesh EPZ Labor act 2019, chapter 2, section 6: No employer shall employ any worker without giving an appointment letter and each such employed worker shall be provided with an identity card with his photograph.
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 workers are not consulted or integrated in the decision-making process of aspects concerning workplace and working conditions (e.g., creation or revision of policies and procedures, changes in production processes, hours of work, etc.). The factory only consulted with worker representatives to fix the arrangement of festival holidays and EID holidays.
Recommendation for Immediate Action	
Compliance Classifications	Sustainable Improvement Required
Local Law	

Freedom Of Association And Collective Bargaining (FOA)

Benchmark ID	FOA.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning freedom of association and collective bargaining. national laws, rules, and procedures protecting the rights of workers to organize and bargain collectively. Where local laws and FLA standards differ, the employer is expected to follow the highest applicable standard.
Finding Details	(1) The tenure of the Worker's Welfare Association expired on March 31, 2024. The Worker's Welfare Association was formed on March 31, 2021, and is valid for three years. However, the factory has not conducted an election for the Worker's Welfare Association. (2) The factory has established a written policy on freedom of association and collective bargaining but lacks a written procedure.
Recommendation for Immediate Action	(1) It is recommended that the factory take the necessary steps to arrange the election of the worker's welfare association and form a new worker's welfare association. (2) Procedure for freedom of association and collective bargaining shall be established.
Compliance Classifications	Immediate Action Required

Local Law	In accordance with Bangladesh EPZ Labor Act 2019, chapter 9, section 105: Unless cancellation of registration earlier or otherwise ceases to exist, the tenure of the Executive Council of any Workers' Welfare Association shall be 3 (three) years from the date of approval under section 104.
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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	The security searches are carried out on a routine basis. However, the factory does not take workers' consent for body searches.
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	Body searches for male workers are conducted by security personnel in public (at an open place near the exit and in front of other male workers without ensuring their privacy).
Recommendation for Immediate Action	

Compliance Classifications	Sustainable Improvement Required
Local Law	
Health, Safety And Environment (HSE)	
Benchmark ID	HSE.5.1.5
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: employee education and training
Finding Details	The factory should have 192 trained fighting team members certified by Bangladesh Fire Service and Civil Defense. However, currently, only 140 trained firefighting team members are certified by the authority.
Recommendation for Immediate Action	Factory shall take the necessary steps to arrange for the additional employees to be certified as firefighting team members.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 10: As far as possible, all workers or at least 18% of the workers employed in each department have to be trained on fire-fighting, emergency rescue operation, first aid and the usage of portable firefighting equipment by Bangladesh Fire Service & Civil Defense or any other Government recognized organization the security has to be ensured by dividing the trained workers into fire-fighting team, rescue team and first aid team (6% members in each team) and the records related herewith have to be preserved in accordance with Form- 23.
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 prohibit smoking within 15 meters (50 feet) of all closed areas. They only posted no smoking signs on the production floor and utility areas. (2) The factory has not provided trolley fire extinguishers with a capacity of 25 kg for all types (dry chemical power, CO₂, and foam) at the electrical substation room, generator room, and boiler room. The factory only provides fire extinguishers with a capacity of 6 kilograms for all types. (3) The installation of the fire hydrant system is still in progress and currently there is no fire hydrant system available in the factory. Therefore, it is not possible to use any water sources in case of a fire. (4) No overhead water reservoir for fire is available at the factory. (5) The factory uses KEPZ road as an assembly point which is not adequate to accommodate all employees. Additionally, the area is used as a loading and unloading point & vehicle parking which will obstruct in case an emergency happens. Additionally, it was observed that loading & unloading vehicles were parked in the assembly area on the assessment day. (6) There are no exit signs installed for at least 8 designated exits, such as at the conference room, sample section, gas cylinder room, medical center, and finished goods warehouse. (7) At least 12 exit signs were found non-functional such as the ground floor, 1st floor, and 2nd floor. (8) There is no fire resistance smoke sealed doors provided at the two exits of the central office (HR, Admin & Compliance department, Commercial department, Accounts & finance department, merchandising department, Planning section, IT section & MD office) on the 2nd floor. (9) Based on the site tour, the following issues were noted : (a) There are no assembly points and exit directional signs from the workplace to the assembly point available on the evacuation plan, and there is no evacuation plan posted at the boiler room, generator room, compressor room, and quilting section. (b) One aisle floor of the dining hall, one aisle floor marking of the finished goods warehouse, and one aisle floor marking of the cutting section were found faded, and the exited directional arrow floor marking was found faded at different places throughout the facility. There was no exit directional floor marking provided for at least two passageways of the cutting section, one passageway of the central office, and one passageway of the dining hall. (10) Based on the site tour, it was noted that the childcare center was found to be non-functional, and there is no childcare center available at the childcare center. Currently, more than 15 lactating mothers are working at the factory, and 12 workers are on maternity leave.

<p>Recommendation for Immediate Action</p>	<p>1. The factory shall prohibit smoking within 15 meters of the factory premises. 2. Factory shall install a trolley system dry chemical powder type, Co2 type, and foam type fire extinguisher with a capacity of 25 kilograms in all required areas. 3. Factory shall install a proper fire hydrant system and shall provide an overhead water reservoir to ensure the water supply 4. Factory shall provide a proper & safe assembly point. 5. Factory shall post exit signs at all required exits. 6. Factory shall provide fire resistance smoke sealed doors in all required areas. 7. Factory shall include an assembly point on the evacuation plan and shall post the evacuation plan at all required areas. 8. Factory shall re-paint all faded directional floor markings and shall provide floor markings in all required areas. 9. Shall ensure a functional childcare center.</p>
<p>Compliance Classifications</p>	<p>Immediate Action Required</p>
<p>Local Law</p>	<p>1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 87. 2. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 4. 3. In accordance with Bangladesh National Building Code 2020, part 4, chapter 4, section 4.2.2.5. 4. In accordance with Bangladesh National Building Code, Part IV, Appendix A, section A (10), sub-section a(iv). 5. In accordance with Bangladesh National Building Code 2020, part 4, chapter 3, section 3.16, sub-section 3.16.1. 6. In accordance with Bangladesh National Building Code 2020, part 4, chapter 3, section 3.13, sub-section 3.13.2. 7. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 8 & In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub-section e. 8. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 64, sub-section 1:</p>
<p>Benchmark ID</p>	<p>HSE.5.1.3</p>
<p>Benchmark Details</p>	<p>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</p>
<p>Finding Details</p>	<p>There are at least 12 exit signs at the factory that were not in function when power/electricity was shut down. Those exit signs are located on the ground floor, first floor, and second floor.</p>

Recommendation for Immediate Action	The factory shall take the necessary steps to ensure that all exit signs are lighted when power goes out.
Compliance Classifications	Immediate Action Required
Local Law	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.
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	Based on the site tour, document review, and management interview it was noted that currently there is no functional emergency alarm system (fire alarm & smoke detection system) to notify workers of emergencies available at the facility, due to moving location in May 2024. Fire alarm and smoke detection system installation work is in progress and the fire alarm control panel was found non-functional on the assessment days.
Recommendation for Immediate Action	The factory shall install a fully functional emergency alarm system (fire alarm & smoke detector) at the facility.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 13: In accordance with BNBC, Part 4, Chapter 4, Section 4.4 : In accordance with Fire Service & Civil Defense 1959, (E.P. Ord XVII of 1959), Fire Service Rules, 1961, Standard IX:
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	Based on the site tour, the below issues were noted: (i) It was noted that at least two exits were partially obstructed by goods, such as on the ground floor and 2nd floor. (ii) There were workers' evacuation passage routes partially obstructed by goods, equipment, and co-workers, such as the seam tape section, CWS section, ironing section, sewing section, and finishing section. One aisle at the finishing section, one aisle at the finished goods warehouse, and two aisles at the sewing section were partially obstructed by a trolley and finished goods carton. (iii) Two emergency rescue windows were partially blocked by goods and machines, such as the 1st floor and 2nd floor. (iv) There was no designated space to store trolleys and ladders. The trolley & ladder were kept along the evacuation aisles when not being used which created the blockage and obstruction. (v) Combustible materials stored under one stair on the ground floor of the front side of the building.
Recommendation for Immediate Action	1. Ensure that all exits, passageways, aisles and emergency rescue windows are free from obstruction and blockage. 2. Provide designated space to store the unused trolley and ladder when not in use. 3. Remove the combustible materials stored under the stairs.
Compliance Classifications	Immediate Action Required
Local Law	1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 2: 2. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 14. 3. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 103, sub-section 11: 4. 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.
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) It was noted that there was no secondary containment provided under the chemical container in the maintenance room. (2) It was noted that there is no safety label in the native language available for chemicals (such as Machine oil, WD 40) used at the maintenance room.
Recommendation for Immediate Action	1. Provide secondary containment under all chemical containers. 2. Post safety labels on all chemicals in the Bengali Language.
Compliance Classifications	Immediate Action Required
Local Law	1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 90, Sub-section 11: 2. In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (k):
Benchmark ID	HSE.2
Benchmark Details	All documents required to be available to workers and management by applicable laws (e.g. health and safety policies, MSDS, environmental emergency plans) shall be made available in the prescribed manner and in the local language or language spoken by the workers, if different from the local language.
Finding Details	The factory has two compressors, but no hydraulic tests have been conducted by the competent personnel or organization.
Recommendation for Immediate Action	The factory shall conduct hydraulic tests of compressor vessels by engaging with the competent personnel.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 43, sub-section 6:
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	1. At least 10 industry-standard emergency lights on the ground floor, first floor, and second floor are not working well during emergency light test by power shutdown. Additionally, there are no emergency lights installed in one aisle at the finished goods warehouse and fabric warehouse. 2. Based on the document review, the noise level of the generator room exceeds 85 dB. The latest test report on August 3, 2024, showed that the generator room noise level reached 97.1 dB, which does not comply with local law requirements.
Recommendation for Immediate Action	1. Factory shall take the necessary steps to ensure that all emergency lights are functional and shall install emergency lights in all required areas. 2. Factory shall take the necessary steps to keep the noise level of the generator room within the legal acceptance level.
Compliance Classifications	Immediate Action Required
Local Law	1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub-section f: 2. In accordance with Bangladesh EPZ Labor Rules, 2022, chapter 4, section 90, sub-section 1 (22)
Benchmark ID	HSE.14.1
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.

<p>Finding Details</p>	<p>(1) The traffic lanes and walk paths are not clearly marked at the factory entrance and exit gate where vehicles move. Additionally, speed breakers and convex mirrors are not installed at blind turns. (2) At least 20% of machines are not equipped with eye shields. Additionally, around 20% of needle guards are installed too high at high-speed machines which does not comply with the purpose of safety measures. (3) The factory uses around 23 compressed gas cylinders but they are not stored and transported properly. The gas cylinders are not properly chained and not provided with safety labels, such as the gas cylinders at the storage room were missing proper labels & chained.</p>
<p>Recommendation for Immediate Action</p>	<p>1. Mark traffic lanes & walk paths clearly, and shall provide a speed breaker and convex mirror. 2. Train workers to use machine safety guards properly to ensure their own safety. 3. Properly store gas cylinders.</p>
<p>Compliance Classifications</p>	<p>Immediate Action Required</p>
<p>Local Law</p>	<p>1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 39, sub-section e: 2. In accordance with Bangladesh EPZ Labor Act 2019, Chapter 4, section 35, sub-section 3(c) and In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (f): 3. In accordance with Bangladesh Gas Cylinder act 1991, chapter 2, section 11</p>
<p>Benchmark ID</p>	<p>HSE.6.1</p>
<p>Benchmark Details</p>	<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>

<p>Finding Details</p>	<p>(1) There is no floor marking or non-obstacle sign provided in front of at least 12 fire extinguishers, such as in the dining hall, finished goods warehouse, packing section, or fabric warehouse. (2) At least 4 fire extinguishers were directly placed on the floor and not properly mounted. At least 4 fire extinguishers were found partially obstructed by goods and trolley, such as the sewing section and finished goods warehouse., (3) It was noted that fire pump installation work was in progress and there was no functional fire hydrant system available at the facility. In addition, the fire hose was not supplied with any water to extinguish a fire in case of any fire incident occurring at the factory. (4) It was noted that the facility did not ensure to maintain at least monthly routine inspections for at least 40% of fire extinguishers throughout the facility. In addition, there is no routine inspection of the fire hose as well.</p>
<p>Recommendation for Immediate Action</p>	<p>1. Provide floor marking under all firefighting equipment, shall install fire extinguishers at the proper height, and shall ensure fire extinguishers are obstacle-free. 2. Install a fire hydrant at the factory. 3. Establish monthly routine inspections of all firefighting equipment.</p>
<p>Compliance Classifications</p>	<p>Immediate Action Required</p>
<p>Local Law</p>	<p>1. In accordance with Bangladesh National Building Code 2020, part 4, chapter 4, section 4.4, sub-section 4.4.3. 2. In accordance with Bangladesh National Building Code 2020, part 4, chapter 4, section 4.2.2.5. 3. In accordance with Bangladesh National Building Code 2020, part 4, chapter 4, section 4.4, sub-section 4.4.6.</p>
<p>Benchmark ID</p>	<p>HSE.27.3</p>
<p>Benchmark Details</p>	<p>Children must not visit parents in workplace areas.</p>
<p>Finding Details</p>	<p>It was noted that workers who were working in childcare did not receive specific health and safety/hygiene training.</p>
<p>Recommendation for Immediate Action</p>	<p>The factory shall provide specific health and safety training to the workers who work in the childcare center.</p>

Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 64, sub-section 2 : In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (c):
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 factory has a diesel generator with a capacity of 400KW, but it lacks a waiver certificate or operating permission. The license has been applied since July 2, 2024, but until now, it is still under process by the authority.
Recommendation for Immediate Action	The factory shall take the necessary steps to obtain a generator operating license from the concerned authority.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with the Bangladesh Energy Regulatory Commission Act, 2003, Sec 27: (1) of Bangladesh: No person shall engage himself in the following business unless he is empowered by a license or exempted from having it under this Act or any other Act, such as:- power generation; energy transmission; energy distribution and marketing; energy supply; and energy storage.
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

<p>Finding Details</p>	<p>(1) The factory has not obtained a fire safety plan from Bangladesh Fire Service and Civil Defense under its business name at current operating location. The factory moved from previous location to the current location in the same export processing zone on May 2, 2024, and they rented the buildings from the processing zone. The Bangladesh Fire Service & Civil Defense issued a fire safety plan on March 12, 2018, to the company who previously operated at this current location and the factory had yet to get a fire safety plan under its business name. (2) The factory constructed four sheds (for Utility, Gas cylinder, and waste storage) but these sheds were not included in the fire safety plan. (3) It was noted that different types of waste materials such as metal scrap, unusable bamboo, food waste, cardboard, and chemical containers were all stored next to the utility area without providing any cover. (4) It was noted that the facility did not ensure the disposal of waste by government-approved organizations. The facility made a waste disposal agreement with a company to handle the solid waste, who obtained a trade license from Chattogram City Corporation as a supplier but not for the disposal of waste. Besides, it was noted that the trade license of the company was expired on July 1, 2024. (5) It was noted that the facility did not update the occupant load plan on a daily basis and all occupant loads were found blank, and no data was found on the occupant load plan board.</p>
<p>Recommendation for Immediate Action</p>	<p>1. Factory shall take the necessary steps to obtain a fire safety plan from Bangladesh Fire Service and Civil Defense and shall include all sheds & buildings in the fire safety plan. 2. Factory shall take the necessary steps to ensure all types of waste are properly stored and disposed of. 3. Factory shall take the necessary steps to dispose of waste by the appropriate organization and shall take the necessary steps to renew the trade license of the waste purchaser. 4. Factory shall post an occupant load plan in the workplace.</p>
<p>Compliance Classifications</p>	<p>Immediate Action Required</p>

Local Law	1. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 45, sub-section 13 & In accordance with Bangladesh National Building Code 2020, part 4, Appendix A, section A.6, Sub-Section A.6.1: 2. In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 3 (a): 3. In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 66, sub-section 1: 4. In accordance with RSC technical guidelines, section 6.4.4:
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 an injury register to the additional Inspector general of KEPZ as per prevailing legislation.
Recommendation for Immediate Action	The factory shall submit the injury register at least on an annual basis.
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.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	At least 20% of overlock machine operators and 20% of cutting machine operators were working without wearing a face mask and head scarp/cap. The boiler operator was working without wearing an earplug in a noisy environment. In addition, the painters were working without wearing PPE as well.
Recommendation for Immediate Action	The factory shall provide awareness training to all workers to ensure that workers are properly wearing PPE.
Compliance Classifications	Immediate Action Required
Local Law	In accordance with Bangladesh EPZ Labor act 2019, chapter 4, section 35, sub-section 2 (d): In accordance with Bangladesh EPZ Labor Rules 2022, chapter 4, section 69, Sub-section 3:
Benchmark ID	HSE.10.2
Benchmark Details	Workers shall have free access to MSDS.
Finding Details	The factory stored machine oil in the maintenance room without proper MSDS.
Recommendation for Immediate Action	It is recommended that the factory post MSDS/SDS for the chemicals in the Bengali language at both storage and usage areas.
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.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 has not provided anti-fatigue mats for all workers working in the standing area of the cutting, sewing, quality, and finishing sections.
Recommendation for Immediate Action	Provide anti-fatigue mats under the feet of the longtime standing workers.
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;

Hours Of Work (HOW)

Benchmark ID	HOW.3
Benchmark Details	Employers shall provide reasonable meal and rest breaks, which, at a minimum, must comply with national laws.
Finding Details	It was noted that the working hours of workers started from morning 7.30 AM & the facility provided breaks in three batches: 1st batch from 11.45 PM to 12.15 PM, 2nd batch from 12.20 PM to 12.50 PM, and 3rd batch from 12.55 PM to 13. 25 PM. The facility did not ensure to provide at least 30 30-minute breaks after five hours of consecutive duty of 3rd batch rest taker workers. In addition, the facility provided a rest time of only 30 minutes instead of 60 minutes which did not comply with legal requirements. However, the facility provided leave 30 minutes before the duty ended instead.
Recommendation for Immediate Action	It is recommended that the factory ensure to provide at least a 30-minute break after five consecutive working hours and shall ensure at least a 60-minute break in a working day.
Compliance Classifications	Immediate Action Required

Local Law	In accordance with Bangladesh EPZ Labor Act 2019, chapter 5, section 39: In an enterprise no worker shall be liable to- (a) work for more than 6 (six) hours in a day, unless he is given an interval of 1 (one) hour for rest or meal during that day; (b) work for more than 5 (five) hours in a day, unless he is given an interval of 30 (thirty) minutes for rest or meal during that day; or (c) work for more than 8 (eight) hours in a day, unless he is given 1 (one) interval under clause (a) or 2 (two) intervals under clause (b) for rest or meal during that day.
Benchmark ID	HOW.21
Benchmark Details	Other than in exceptional circumstances, the total weekly work hours (regular work hours plus overtime including any alternative shifts such as 4x4 or 3x3) shall not exceed 60 hours per week.
Finding Details	Based on the provided time card, it was noted that daily overtime ranged from 0 to 2 hours, and workers performed some rest day work. The weekly working hours of workers therefore exceeded 60 hours and reached 68 hours. Around 80% of sampled workers worked more than 60 hours a week in June, May, April, and February 2024 despite workers not working more than 60 hours in the rest of the month. For instance: (i) June 1 to 7, 2024, workers worked in total 68 hours & daily overtime hours was 2; May 18 to 24, 2024, workers worked in total 68 hours & daily maximum overtime hours was 2; and May 2 to 8, 2024 workers worked in total 68 hours & daily maximum overtime hours was 2. (ii) From April 17 to 23, 2024, workers worked a total of 68 hours & daily overtime hours were 2; and from February 10 to 16, 2024, workers worked a total of 68 hours & daily overtime hours were 2.
Recommendation for Immediate Action	It is recommended that the factory shall control the working hours to ensure that workers are not working more than 60 hours a week.
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: Provided further that the Authority may, in cases of some particular industries, under conditions imposed by order in writing, relax the provisions of this section or exempt from the provisions of this section at a time for a period of not exceeding 6 (six) months, if the Authority is satisfied that such relaxation or exemption is necessary for the public interest or economic development.
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 the provided time records, workers performed some rest day work in 2024 for June, May, April, and February 2024. During these periods, at least 80% of sampled workers were not guaranteed one day rest in seven and consecutively worked for 8 to 13 days, such as June 1 to 13, 2024 (total 13 days), May 18 to 30, 2024 (total 13 days), May 2 to 9, 2024 (total 8 days), April 17 to 25, 2024 (total 9 days) and February 10 to 20, 2024 (total 11 days).
Recommendation for Immediate Action	Factory shall provide one day off 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.

