



FAIR LAB  
ASSOCIATION



ASSESSMENT REPORT

**COMPANY: PVH Corp**

**COUNTRY: Jordan**

**ASSESSMENT DATE: 10/29/14**

**MONITOR: ELEVATE Global Limited**

**PRODUCTS: Apparel**

**PROCESSES: Cut, Other**

**NUMBER OF WORKERS: 813**

**NUMBER OF WORKERS INTERVIEWED:**

**ASSESSMENT NUMBER: AA0000000580V**

### **FLA Comments**

The PVH Corporation ended their affiliation with the Fair Labor Association in February 2020. Therefore, there will be no further updates to the Company Action Plans plans contained in this report.

Due to this disaffiliation PVH Corporation is no longer listed on the Fair Labor Association Website, however, their Independent External Assessment reports can still be found at: <https://www.fairlabor.org/transparency/workplacemonitoring-reports>

*Improving Workers' Lives Worldwide*

## Findings and Action Plans

### FINDING NO.1

#### RECRUITMENT, HIRING & PERSONNEL DEVELOPMENT

**FINDING TYPE:** Sustainable Improvement Required

##### Finding Explanation

1. Migrant workers pay recruitment fees to recruitment agencies or middlemen. Bangladeshi workers pay USD 300; they receive back USD 200 once they have completed 6 months at the factory. The amount is paid to their families back home. Sinhalese workers pay USD 500 to recruitment agencies, like Rainbow and Ivory, and they are not subsequently reimbursed.

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.5 and ER.6)

##### Verification Result:

1. **Finding Status (Remediated)**

Explanation: The factory pays all agency costs for the workers. In the agreement between the factory and the agencies there are statements that indicate no recruitment fee will be charged to the workers. Additionally, factory has wire transfers documentation covering all requirements, visa and plane tickets.

### FINDING NO.2

#### RECRUITMENT, HIRING & PERSONNEL DEVELOPMENT

**FINDING TYPE:** Immediate Action Required

##### Finding Explanation

1. The factory asks for blood tests during the hiring period, including HIV test, which carries the risk of discrimination during the recruitment process.

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.3; Nondiscrimination Benchmark ND.10)

##### Recommendations for Immediate Action

1. Cease the practice of requesting blood tests during the hiring process.

##### Verification Result:

1. **Finding Status (Partially Remediated)**

Explanation: Even though the factory does not directly require or specifically indicate in its procedures that workers are required to take a blood test, a test is administered before coming to Jordan. It's also a requirement from the local authorities as part of having a work permit.

root causes. In the home countries of the workers, all agencies require a blood test. Moreover in Jordan, blood tests are legally required during the hiring process. Therefore blood tests are conducted for all migrant workers. This test can also reveal the pregnancy of female workers.

### **Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmark ER.3; Nondiscrimination Benchmarks ND.5, ND.6, ND.7 and ND.10)

### **Recommendations for Immediate Action**

Ensure that factory does not apply pregnancy test results as a condition of hiring workers,

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

## **FINDING NO.3**

### **HOURS OF WORK**

**FINDING TYPE:** Immediate Action Required

### **Finding Explanation**

1. Total weekly working hours (regular + overtime hours) exceeded the legal limit of 60 hours in 2014 for 85% of the workforce. Furthermore, the production plan always includes overtime. Before September 2014, the weekly working hours were set to 72 hours per week, including 24 weekly overtime hours. After September 2014, they were set to 66 hours per week, including 12 weekly overtime hours.
2. Total daily working hours (regular + overtime hours) exceeded the legal limit of 10 hours a day. The daily working hours were regularly 12 hours per day before September 2014, and 11 hours per day after September 2014.

### **Local Law or Code Requirement**

Jordanian Labor Law, Article 57; FLA Workplace Code (Employment Relationship Benchmark ER.24; Hours of Work Benchmark HOW.1)

### **Recommendations for Immediate Action**

1. Ensure that the regular production planning does not include overtime.
2. Ensure that daily and weekly working hours do not exceed legal or FLA limits, whichever is lower.
3. FLA affiliate Company's Sourcing and Social Compliance teams should: a) implement FLA Principles of Fair Labor and Responsible Sourcing and b) accordingly coordinate on the topics mentioned below to help the factory address its excessive hours issue:
  1. How to provide better order forecasts to the factories;
  2. Possible workshops/consultancy for the factory on how to improve productivity/quality;
  3. Clear guidelines on how to extend shipment deadlines in case of contingencies;
  4. Steps that factory management must follow if overtime is inevitable (steps for how to communicate with the brand's Sourcing and Social Compliance teams);
  5. Clear guidelines on the calculation and setting of reasonable production targets that will not demand work beyond regular working hours or during breaks;
  6. Clear guidelines on how and when the factory can use subcontractors and/or temporary workers to avoid excessive overtime.

**Verification Result:**

1. **Finding Status (Not Remediated)**

Explanation: Based on worker interviews and documentation review for 38 sampled time sheets covering months from April 2017 to September 2017 and January 2017 the facility is breaching the daily hours limit for both migrant and local workers; it may reach up to 12 hours of work in a day. The factory regularly exceeds the 60 working hour per week limit, with an average of 71 hours in a week for migrant workers, who represent around 90% of work force.

Based on the overtime report for the month of September 2017, out of 1905 workers included in the report, 1157 workers has exceeded the maximum daily limit of overtime. Therefore, the production plan of the factory still includes overtime.

Root Causes: Regular production planning still includes daily overtime for 3 hours per day.

2. **Finding Status (Not Remediated)**

Explanation: Based on worker interviews and documentation review, the factory’s regular working hours are for eleven hours per day; eight normal working hours and three overtime hours.

Root Causes: The factory is basing its overtime planning on the old version of clause no. 56 in Jordanian labor law where it allows eleven working hours in a day while the new law reduces the maximum working hours to ten hours in a day. Additionally, facility is not aware of FLA requirements regarding overtime.

**Local Law or Code Requirement**

Jordanian Labor Law, Article 57; FLA Workplace Code (Employment Relationship Benchmark ER.24; Hours of Work Benchmark HOW.1)

**Recommendations for Immediate Action**

1. Ensure that the regular production planning does not include overtime.
2. Ensure that daily and weekly working hours do not exceed legal or FLA limits, whichever is lower.
3. FLA affiliate Company’s Sourcing and Social Compliance teams should: a) implement FLA Principles of Fair Labor and Responsible Sourcing and b) accordingly coordinate on the topics mentioned below to help the factory address its excessive hours issue:
  - a. How to provide better order forecasts to the factories;
  - b. Possible workshops/consultancy for the factory on how to improve productivity/quality;
  - c. Clear guidelines on how to extend shipment deadlines in case of contingencies;
  - d. Steps that factory management must follow if overtime is inevitable (steps for how to communicate with the brand’s Sourcing and Social Compliance teams);
  - e. Clear guidelines on the calculation and setting of reasonable production targets that will not demand work beyond regular working hours or during breaks;
  - f. Clear guidelines on how and when the factory can use subcontractors and/or temporary workers to avoid excessive overtime.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

## FINDING NO.4

### HOURS OF WORK

**FINDING TYPE:** Immediate Action Required

#### Finding Explanation

1. There are migrant workers who worked without one rest day in every seven day work period; the longest period of work without rest was 13 consecutive days in June 2014. Furthermore, migrant workers (90% of total workers) worked with only one rest day in August (1st of August) and October (3rd of October).

#### Local Law or Code Requirement

Jordanian Labor Law, Article 60; FLA Workplace Code (Hours of Work Benchmark HOW.2)

#### Recommendations for Immediate Action

1. Ensure that workers receive at least one day off in each seven-day period as required by law and the FLA Workplace Code.

#### Verification Result:

1. **Finding Status (Not Remediated)**

Explanation: During documentation check that 3 workers out of the 38 sampled time records worked 13 days without rest in January, April, May, and June 2017

Root Causes: Facility planning and production targets that are based on 11 hours of work on daily basis.

#### Local Law or Code Requirement

Jordanian Labor Law, Article 60; FLA Workplace Code (Hours of Work Benchmark HOW.2)

#### Recommendations for Immediate Action

1. Ensure that workers receive at least one day off in each seven-day period as required by law and the FLA Workplace Code.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

## FINDING NO.5

### GRIEVANCE SYSTEM

**FINDING TYPE:** Sustainable Improvement Required

#### Finding Explanation

1. The grievance boxes, which are the only grievance channel available, are not used effectively The boxes are only labeled as “suggestion boxes,” and the workers are not informed about the steps for using the boxes. Nor are they placed in locations that would ensure confidentiality. Moreover, no feedback is provided to workers for the grievances received.
2. The workers are uninformed about the grievance system and receive no training on the topic, nor does the factory provide training to supervisors on the grievance system.
3. Special categories of workers do not have access to the Grievance system.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.14, ER.17, and ER.25)

**Verification Result:**

1. **Finding Status (Not Remediated)**

Explanation: Suggestion boxes are placed in production areas and are not used often. The workers do not have information about the suggestion boxes and the grievance procedures. Therefore, the suggestion boxes are not effective as a grievance system.

Root Causes: Since there is a worker representative system and open door policy in the factory, management thinks the workers are already able to convey their suggestions and grievances. The attitude is that the workers do not prefer to use boxes so there is no need to improve of this system. Additionally, the suggestion policy is posted on the notification boards, which the workers do not use.

2. **Finding Status (Partly Remediated)**

Explanation: The factory does not provide on specific training to worker or supervisors on grievance system including using of suggestion boxes. However, the grievance policy is posted on notification boards.

Root Causes: The factory does not have an on-going training system on any of Employment Function except Health and Safety. Since there is a worker representative system and open door policy in the factory, management thinks the workers are already able to convey their suggestions and grievances. The attitude is that the workers do not prefer to use boxes so there is no need to improve of this system.

3. **Finding Status (Remediated)**

Explanation: There is no difference between special categories of workers and workers to access to the suggestion boxes. Since the boxes are not used often, it is not a common way to convey grievances in special categories of the workers.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.14, ER.17, and ER.25)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**Finding Explanation**

1. One worker was not using Personal Protective Equipment (PPE) while working with chemicals (spot lifter) at the stain removing section.
2. No PPE are provided at the maintenance room, and the steel meshed gloves in the cutting section were damaged, and had holes in them.

**Local Law or Code Requirement**

Jordanian Labor Law article 80, and Regulation No: 43 of the year 1998; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.7)

**Recommendations for Immediate Action**

1. Ensure that all the workers are provided with PPE, and that they use them properly.

**Verification Result:**

1. **Finding Status (Remediated)**

Explanation: The worker in stain removing section was wearing Personal Protective Equipment.

2. **Finding Status (Not Remediated)**

Explanation: Personal Protective Equipment, goggles and steel gloves, in maintenance room were covered in dust and had not been used for a long time. Additionally the gloves were damaged. In the cutting section, the factory has provided protective steel gloves to cutting operators, however they are damaged and have holes.

Root Causes: The factory does not have training and periodic checks related to maintenance safety. The gloves provided to the workers do not fit workers properly, therefore the gloves are easily damaged and make it hard for workers to use them.

**Local Law or Code Requirement**

Jordanian Labor Law article 80, and Regulation No: 43 of the year 1998; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.7)

**Recommendations for Immediate Action**

1. Provide proper PPE to the maintenance section workers and ensure that maintenance workers are trained on to use proper PPE while they are working.
2. Provide steel gloves in correct size to the cutting section workers and provide training on how to use and replace the PPE in case it is damaged.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**FINDING TYPE:** Immediate Action Required**Finding Explanation**

1. The emergency exit door at Building 2 opens inward, and does not leading to a safe place without stairways. Also, there is a 6-7 cm high barrier on the floor at the emergency exit door for Building 1. All of the emergency exit doors open inwards at Building 3 and the warehouse.
2. The emergency exit floor markings are not clear. The old ones have peeled off, but are still visible in Building 3, which might create confusion.
3. One of the evacuation plans is in the wrong direction in Building 2. Also, the “you are here” sign was not clearly marked on the all evacuation plans.
4. Workers are not trained on emergency evacuation.

**Local Law or Code Requirement**

Jordanian Labor Law Article, 80; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.5)

**Recommendations for Immediate Action**

1. Ensure that all emergency exit doors lead to a safe place in case of emergency.
2. Ensure that all emergency exit route markings are clearly marked, and that the outdated markings are thoroughly removed.
3. Ensure that all emergency evacuation plans align with the actual factory layout. Also, “you are here” sign should be clearly marked on the plans.

**Verification Result:****1. Finding Status (Partly Remediated)**

Explanation: The management removed exit sign from that door, and this door is not used as an emergency exit anymore. However, there are still emergency evacuation arrows on the ground leading to this door and the emergency evacuation map still has door as an emergency exit door. The barrier was removed from the exit door in Building 1. The emergency exits now open outwards, except for one sliding door. This door is also a loading door, and the portable platforms for loading materials to the trucks were obstructing the exit.

Root Causes: The factory does not have a system to review and renew floor markings according to changes in the factory. The workers who load the trucks are not specifically trained on emergency evacuation safety, and this situation is not indicated as a risk in the risk assessment.

**2. Finding Status (Not Remediated)**

Explanation: The emergency floor markings are still not clear, and old markings are still visible in Building 3.

Root Causes: The factory does not have a system to review and renew floor markings.

**3. Finding Status (Partially Remediated)**

Explanation: The direction of the evacuation map was corrected, however, the ‘you are here’ sign is not included on the map.

Root Causes: The evacuation maps are not checked after they prepared, and the risk assessment does not include evacuation map details to ensure correct signs are placed on the maps.

**4. Finding Status (Remediated)**

Explanation: Workers are periodically trained on emergency evacuation.

### Local Law or Code Requirement

Jordanian Labor Law Article, 80; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.5)

### Recommendations for Immediate Action

1. Ensure that all emergency exit route signs are leading emergency exits and floor markings are renewed regularly.
2. Train loading section workers on emergency evacuation risks and ensure that all emergency exits are free from any obstruction.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

## FINDING NO.8

### HEALTH & SAFETY

**FINDING TYPE:** Immediate Action Required

### Finding Explanation

1. The canteen personnel handling food in the factory's cafeteria do not follow proper hygiene rules, nor do they keep food samples for 48 hours against the risk of food poisoning.
2. The cafeteria in the dormitory does not have sufficient seats. While there are around 72 workers living on each floor, there were only around 10 chairs per floor provided in the cafeteria.
3. There is no refrigerator at the dormitory.
4. There is a foul smell in all the toilets, since the flushes are not operational.
5. The responsible person for first aid was not identified with a photo next to 50% of the first aid kits.

### Local Law or Code Requirement

Instruction NO. 1 (2011) for Prevention of Health Hazards Resulting from Housing Units of Labour Camps; FLA Workplace Code (Health, Safety & Environmental Protection Benchmarks HSE.6, HSE.19, HSE. 22 and HSE.25)

### Recommendations for Immediate Action

1. Fix the toilet flushes.
2. Post a photo of the person responsible for first aid next to the first aid kits.

### Verification Result:

1. **Finding Status (Not Remediated)**

Explanation: The kitchen personnel do not follow hygiene rules, such as wearing gloves, head covers and masks, and do not keep food samples against the risk of food poisoning.

Root Causes: There is no instruction in the kitchen to wear gloves and masks, and kitchen personnel are not regularly trained on importance of hygiene rules in the kitchen. Food poisoning is not considered as a risk by the factory.

2. **Finding Status (Remediated)**

Explanation: The seats in cafeterias of the dormitories were sufficient for the number of workers.

3. **Finding Status (Not Remediated)**

Explanation: The factory has not provided a refrigerator for the dormitories.

Root Causes: Since the factory provides meal to the workers, management thinks the storage of the meals is unnecessary, although workers also cook in the dorms. Providing refrigerators to the all dorms is a coast concern, taking into consideration the number of the workers.

4. **Finding Status (Partially Remediated)**

Explanation: The toilets were not that smelly during the assessment since they were well cleaned, however, flushes still do not operate.

Root Causes: Since the number of workers is quite high, the flushes are frequently broken. Therefore the factory uses outdated toilet bowls designs.

5. **Finding Status (Partially Remediated)**

Explanation: The majority of first aid boxes have a first aide providers list beside it, but one box at Building 1 does not have this list.

Root Causes: The factory’s health and safety checks do not include the first aide providers list or pictures near the first aid box.

**Local Law or Code Requirement**

Instruction NO. 1 (2011) for Prevention of Health Hazards Resulting from Housing Units of Labour Camps; FLA Workplace Code (Health, Safety & Environmental Protection Benchmarks HSE.6, HSE.19 and HSE. 22)

**Recommendations for Immediate Action**

1. Ensure that cooking personnel follows hygiene rules and use mask, gloves and head covers while cooking or serving.
2. Provide refrigerators to the dormitories.
3. Provide operating flushes to toilets.
4. Provide a first aide providers list and pictures near all first aid boxes.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**FINDING NO.9**

**COMPENSATION**

**FINDING TYPE:** Sustainable Improvement Required

**Finding Explanation**

1. As per Jordanian Labor Law, migrant workers receive JOD 110 plus JOD 5 for each completed year, whereas, the local (Jordanian) workers receive minimum JOD 190. The rationale is that factory pays for accommodation, travel, and food expenses for migrant workers, but not the local workers.

**Local Law or Code Requirement**

Tripartite Committee for Labour Affairs Decision of 2/15/2012; FLA Workplace Code (Non-Discrimination Benchmarks ND.1 and ND.3)

**Verification Result:**

1. **Finding Status (Not Remediated)**

Explanation: The factory has adopted a new Collective Bargaining Agreement which includes conditions for increasing minimum wage to 205JD for all workers starting March 2017, however, the current payments are:

- a. Local worker salary: 190 JD basic salary and 15JD Social Insurance payment; total salary received in hand 205JD
- b. Migrant worker salary: 110JD basic salary, 85JD food & accommodation (not included in pay slip), 10JD social insurance payment; total salary received in hand 120JD.
- c. Both groups of workers hourly wage is calculated at 205JD for overtime calculations.

Root Causes: the factory has adopted a new CBA which basically codifies the different pay levels for migrant workers, and the actual change has only been for social insurance payment and overtime payments.

**Local Law or Code Requirement**

Tripartite Committee for Labour Affairs Decision of 2017; FLA Workplace Code (Non-Discrimination Benchmarks ND.1 and ND.3)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**FINDING NO.10**

**WORKER INTEGRATION (MACRO)**

**FINDING TYPE:** Sustainable Improvement Required

**Finding Explanation**

- 1. The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.1.3 and ER.25.2)

**Verification Result:**

1. **Finding Status (Not Remediated)**

Explanation: The management has dialogue mechanism with workers, however, the worker integration component is still missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.

Root Causes: There is no system of policy, procedure to ensure to integrate workers in decision-making or creation of policy and procedures process.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.1.3 and ER.25.2)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**FINDING NO.11**

**RECRUITMENT, HIRING & PERSONNEL DEVELOPMENT**

**FINDING TYPE:** Sustainable Improvement Required

**Finding Explanation**

1. There are no procedures on performance review that include steps and processes, demonstrate linkages to job grading, prohibit discrimination, provide written feedback, and comply with legal requirements.
2. There are no procedures for steps and requirements in the promotion, demotion and reassignment scheme.
3. There is no regular review system for any of the factory's policies and procedures.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.1.3, ER.29, and ER.30)

**Verification Result:**

1. **Finding Status (Not Remediated)**

Explanation: The factory policies and procedures do not include performance reviews that include steps and processes, demonstrate linkages to job grading, prohibit discrimination, provide written feedback, and comply with legal requirements.

Root Causes: The factory does not aware of FLA Benchmarks. Policy and procedures only includes Recruitment and Hiring practices, not performance reviews. There is a non-discrimination policy that covers the general point of view of the factory.

2. **Finding Status (Not Remediated)**

Explanation: There are no policy or procedures for steps and requirements in the promotion, demotion and reassignment scheme.

Root Causes: The factory does not aware of FLA Benchmarks. Policy and procedures only includes Recruitment and Hiring practices, not performance reviews and personnel development.

3. **Finding Status (Remediated)**

Explanation: The factory has started to review its policies and procedures regularly, the last review was conducted in May 2017.

### **Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.29, and ER.30)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

### **(NEW) FINDING NO. 12**

#### **HEALTH & SAFETY**

**FINDING TYPE:** Immediate Action Required

1. There are missing fire extinguishers throughout the factory buildings, 30% of fire extinguishers were missing. Although there are fire extinguisher signs on the wall, 'under maintenance' signs are placed there instead of fire extinguishers.
2. One of the emergency exits in the binding unit in Building 2 is a sliding door, and the other door does not open in the direction of evacuation.
3. Two emergency exit doors in the kitchen and two emergency exits in childcare area were open inwards.
4. The fire alarm control panel for the kitchen was on silent mode.
5. There is construction at the ground floor of Building 1 where regular production is taking place. There is no sign on emergency exit, and the floor markings for evacuation are not visible. Management indicated that the emergency evacuation process would be rearranged on this floor after the construction is completed.
6. The floor markings in Building 1 floor 2 are faded out.

### **Local Law or Code Requirement**

Jordanian Labor Law Article, 80; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.5)

#### **Recommendations for Immediate Action**

1. Replace missing fire extinguishers and ensure that there is a system to check fire extinguishers periodically and replace when they are expired or broken.
2. Ensure that all emergency exit doors in the factory buildings, childcare area and kitchen are opening outwards.
3. Ensure that fire alarm control panel always on and operate in case of emergency.
4. Provide emergency route and exit signs to the ground floor even the arrangement is temporary.
5. Renew the floor markings in Building 1 floor 2.

### **(NEW) FINDING NO. 13**

#### **HEALTH AND SAFETY**

**FINDING TYPE:** Immediate Action Required

#### **Finding Explanation**

3. A migrant worker committed suicide by jumping from the rooftop of one of the dormitories where there was no fence and the door to the rooftop was not locked. According to worker interviews, the worker committed suicide sometime after midnight. Police are still investigating the case.
4. Elevators are only subject to internal inspections.
5. During the factory tour assessors found that 30% sewing machines do not have eye pulley guards, and others are in bad condition. Additionally, 50% of the sewing machines motor belt covers do not provide full coverage of the moving parts, and are in bending in a manner that could cause injuries.
6. Chairs and workstations provided to workers are not adjustable. The mats provided for the ironing section are anti-slip mats, not anti-fatigue mats. No mats are provided to other standing workers. Lifting belts are not provided for the relevant workers.
7. There is a slide on the 2nd floor of Building 1, which is used to use for transferring the finished goods down, to the outside. This slide does not have a cover.
8. There is an unlabeled chemical can at the bonding section in Building 2. This chemical does not have Material Safety Data Sheet.

### **Local Law or Code Requirement**

Special instructions on facilities and workers protection against work place conditions affiliated with article no. 79 of labor law no. of year 1996, Regulation No 43 1998 on Protection and Safety from Equipment, Industrial machines and Job Sites; FLA Workplace Code (HSE.1, HSE.7, HSE.8, HSE.9, HSE.10, HSE.14, HSE.17)

### **Recommendations for Immediate Action**

1. Ensure that all rooftops are protected properly against risk of falling and the doors of rooftops are locked.
2. Ensure that elevators are inspected annually by and authorized external third party along with internal inspections.
3. Provide proper machine guards to the sewing machines and maintain the guards regularly. Replace damaged sewing machine belt covers with proper ones that provide full coverage of moving parts. Train the workers on using the sewing machine guards and its importance in terms of their health.
4. Provide more ergonomic options for workers chairs and have back support, and ensure that workstations are adjustable.
5. Provide a cover to the slide to prevent falling.
6. Ensure that all chemicals are labeled properly and have MSDS forms.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

## **(NEW) FINDING NO. 13**

### **HEALTH & SAFETY**

**FINDING TYPE:** Immediate Action Required

### **Finding Explanation**

1. The number of female toilets is not sufficient for the number of workers on the first floor of Building 1.
2. The dormitories are not well ventilated, especially in the cooking area of the Nepal- Sri Lanka female dormitory. All of the dormitories had a lot of insects (cockroaches and bed bugs), and the dormitory cafeteria floor and cooking area was oily and not clean. The liquid petroleum gas (LPG) detector in the Myanmar- Bengali workers' dormitory is not functioning.
3. There is no liquid petroleum gas detector in the kitchen area.
4. The factory does not provide washing machines at the dormitories, as legally required.
5. There are two nurses and one doctor at the clinic, which is not in compliance with local law, which requires four nurses and three doctors. The factory does not properly track illnesses, and not all workplace accidents are recorded

in the clinic records. There was one case of suicide and two suicidal attempts that were not recorded in the accident log. The factory does not have any resources for mental health.

6. During workers interviews, workers revealed that not all ill workers are recorded in the clinic records.

### **Local Law or Code Requirement**

Appendixes no. 2 and 4 of labor law no. of year 1996, Instruction No.1 of 2011 for Prevention of Health Hazards Resulting From Housing Units of Labor Camps; FLA Workplace Code (Health, Safety & Environmental Protection Benchmarks HSE.1, HSE.3, HSE.19, HSE.20, HSE.22, HSE.25)

### **Recommendations for Immediate Action**

1. Increase the number of female toilets to match the number of workers in Building 1.
2. Ensure that dormitory rooms and cooking areas are ventilated properly and eliminate the insect problem in the dormitories.
3. Ensure that cooking areas are cleaned regularly. Check and maintain LPG detectors on periodic bases.
4. Provide a gas detector for the factory kitchen.
5. Provide washing machines for the dormitories.
6. Increase the number of the nurses and doctors in accordance with labor law requirements.
7. Record all accidents and illnesses, and ensure that these cases are studied and analyzed to reduce accidents.
8. Work with local mental health experts or civil society organizations to create a mental health program and resources at the factory.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

## **(NEW) FINDING NO. 17**

### **HEALTH AND SAFETY**

**FINDING TYPE:** Sustainable Improvement Required

### **Finding Explanation**

1. One of the air compressors in Building 2 was overheated, and the fan near the compressor to cool it down was not working.
2. The factory does not have a proper electrical grounding system.
3. The factory does not have lightning protection system.
4. There was a ladder in the accessories warehouse in Building 2 that does not have stoppers or handrails.
5. The factory does not have a lockout-tag out program.
6. The health and safety procedures do not include steps for workers to raise health and safety concerns, protection against retaliation for workers who raise health and safety concerns, and steps for workers to follow in case of injury.

### **Local Law or Code Requirement**

Regulation No 43 1998 on Protection and Safety from Equipment, Industrial machines and Job Sites; FLA Workplace Code (Health, Safety & Environmental Protection Benchmarks HSE.13, HSE.14)

### **Recommendations for Immediate Action**

1. Ensure that compressors are not overheated and able to work without outside fans.
2. Provide ladders with stoppers and handrails for the warehouses.
3. Ensure that all machinery is connected to a grounding system, and that an authorized third party regularly tests the grounding system.
4. Perform a risk assessment to identify machinery that will be included in a lockout-tagout program, and train all workers on the program details.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**(NEW) FINDING NO. [#]**

**ENVIRONMENTAL PROTECTION**

**FINDING TYPE:** Sustainable Improvement Required

**Finding Explanation**

1. The factory does not segregate hazardous and non-hazardous waste. Waste containers are stored outside and are unprotected from the weather.
2. The factory has not assessed if on-site operations have any negative environmental impacts.
3. The factory does not have a system to respond to any unexpected environmental emergencies.
4. The factory does not have a procedure to enable workers to raise environmental concerns and emergencies, including protection for workers who allege environmental violations. Additionally there is no procedure for reporting environmental emergencies.

**Local Law or Code Requirement**

Articles no. 5 and 8 of Environmental Protection Law no. 6 of year 2017, FLA Workplace Code (Employment Relationship Benchmark ER.3; Health, Safety & Environmental Protection Benchmarks HSE.1 and HSE.5)

**Recommendations for Immediate Action**

1. Create as waste management plan that includes the segregation of hazardous and non-hazardous waste. Properly collect, store, and dispose of waste.
2. Conduct an environmental risk assessment to identify the possible negative environmental impacts that could generate from on-site operations.
3. Design a system to respond to any unexpected environmental emergencies.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**(NEW) FINDING NO. 14**

**POLICY& PROCEDURES (Macro)**

**FINDING TYPE:** Sustainable Improvement Required

**Finding Explanation**

1. There are no procedures on Personnel Development or Termination & Retrenchment.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.27, ER.31 and ER.32)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**(NEW) FINDING NO. 15**

**TRAINING MACRO**

**FINDING TYPE:** Sustainable Improvement Required

**Finding Explanation**

1. Although there is written orientation training content, according to worker interviews the factory does not provide adequate orientation training to all workers. Jordanian workers do not receive any orientation training. Additionally, copy of orientation training is not provided to the workers.
2. The factory does not provide any on-going training on any of the employment functions, except Health and Safety.
3. The factory does not provide specific supervisor training on any of the employment functions.
4. The factory does not provide training on proper lifting techniques and maintenance safety for workers with maintenance responsibilities.

**Local Law or Code Requirement**

Special instructions on facilities and workers protection against work place conditions affiliated with article no. 79 of labor law no. of year 1996, FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.17, ER.25 and ER.27; Health, Safety & Environmental Protection Benchmarks HSE.14 and HSE.17)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**(NEW) FINDING NO. 16**

**INDUSTRIAL RELATIONS**

**FINDING TYPE:** Sustainable Improvement Required

1. FLA Comment: There are restrictions to Freedom of Association in Jordan. Jordan allows one union per industry with close ties to the government. This conflicts with FLA's Workplace Code and Benchmarks regarding workers' right to establish and to join organization of their own choosing. The workers are automatically made members of that union.
2. A copy of Collective Bargaining Agreement is not provided to the workers.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmark ER.16, Freedom of Association Benchmark FOA.2)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**(NEW) FINDING NO. 16**

**WORKPLACE CONDUCT AND DISCIPLINE**

**FINDING TYPE:** Sustainable Improvement Required

- 1. The factory does not have a Workplace Conduct and Disciplinary policy, however, some documents or system exist to manage the process. Additionally, the procedures do not include the requirement to record all warnings, disciplinary actions, and filing requirements.
- 2. There is no procedure for workers to appeal disciplinary actions.
- 3. The factory does not provide workers with a copy of the workplace conduct and discipline rules during orientation.
- 4. A third party does not witness disciplinary actions during their imposition.

**Local Law or Code Requirement**

FLA Workplace Code (Employment Relationship Benchmarks ER.15 and ER.27)

Company Action Plan:	
Action Plan Status:	
Planned Completion:	

**RISK OF NONCOMPLIANCE**

According to worker interviews, the workers have concerns about one of the supervisors' behavior in Building 1, such as shouting. The workers were hesitated to talk in the interviews, but some workers did say that there is pressure and verbal abuse from supervisors. The worker who committed to suicide was also working in this section, and several workers stated this worker had an argument with the supervisor earlier that day.

**Local Law or Code Requirement**

FLA Workplace Code (Harassment and Abuse Benchmarks H/A.5 and H/A.6)

**Recommendations**

- 1. Ensure that supervisors are not using any form of verbal abuse, including screaming, as a means to maintain labor discipline.
- 2. Train the supervisors about harassment and abuse.

Company Action Plan:	
Action Plan Status:	
Planned Completion:	