INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Fast Retailing Co., Ltd.

COUNTRY: Bangladesh ASSESSMENT DATE: 10/03/16 ASSESSOR: Insync Global

PRODUCTS: Apparel

NUMBER OF WORKERS: 1200

FLA Comments

This factory produced roughly 80,000 pieces per month, accounting for an approximate average of 7%-8% of the factory's production capacity until FR decided to exit in March 2017. There is no additional production planned for 2018. Last shipment from factory was September 2016.FR's decision to exit was part of the company's strategic prioritization of production partners that consistently meet quality standards. To that effect, there were some delivery and quality issues prior to FR's decision to exit. There is no risk of retrenchment associated with FR's decision to exit because the factory is able to replace FR production with orders from other brands. For these reasons, FR will not to pursue remediation for the non-compliances identified in this report. There are currently no other FLA company affiliates sourcing from the factory to pursue remediation.

Summary of Code Violations

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.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

- 1. The factory has a written policy on Recruitment and Hiring but not on Personnel Development. There is no written policy and procedure on performance reviews. Performance is not reviewed during the three month probationary period; they are only reviewed when a worker requests a promotion.
- 2. Written procedures on Recruitment and Hiring do not include information on hiring methods i.e. use of recruitment agents, use of workers provided by external agencies, direct hiring on factory payrolls, nature of employment which could be permanent, temporary, probation period, monthly salaried or on piece rate basis.
- 3. There are no written procedures on raising or broadening skills in order to advance workers in their careers. Steps and requirements in the promotion, demotion and reassignment scheme are not defined.
- 4. There is no written policy or procedures on Compensation, however some documents and systems exist to manage wage and benefits. Procedures are updated as required by law, however, do not comply with all FLA Benchmarks on Compensation.
- 5. There are no written procedures on Hours of Work, however, systems are in place to manage working hours. The policy states that working hours follow local Law (Bangladesh Labour Act) and the ILO, however it does not define the factory's practices.
- 6. There is no written policy and procedure for Termination and Retrenchment. However, there are some documents and systems that exist. A note on termination is included in the employee handbook; this note defines the required time period for employees to give advance notice, followed by the process for the employer to review the reasons for termination. No other information pertaining to procedures is defined, such as a method for calculating final payouts, in accordance to legal requirements.
- 7. The factory has a policy on Freedom of Association but not on Industrial Relations and there no written procedures for managing Freedom of Association and Industrial Relations. Procedures are not defined on the formation, function or the terms of the Participation committee
- 8. There is no written policy on Grievance Systems, however, a document and system exists which allows for workers to report grievances. There is no written policy on non-retaliation and reported grievances are not documented.
- 9. There is no written procedure for managing environmental impact, however, the factory management has introduced systems like replacing mercury lights with LED lights, installing water meters to monitor water consumption, and controlling air emissions.
- 10. There are no procedures to enable workers to raise environmental concerns and for reporting environmental emergencies. There are no procedures that include protections for workers who allege environmental violations.
- 11. There are no written procedures, however there are systems to manage fire safety, chemical safety and first aid procedures.
- 12. All policies were made in January 2012 and have not been reviewed since.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1, ER.15, ER.19, ER.23, ER.26, ER.27, ER.29, ER.30, ER.31, ER.32; Health, Safety and Environment Benchmark HSE.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

12. We will change every year.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: The Policy review meeting will be held on Oct 2017.

Action Plan no 2.

Description

1. We will review the policy & Procedure. These policy & procedure will clearly describe about personnel development, performance review.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 3.

Description

2. We will review the recruitment policy where the detail hiring method will be clearly described. Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 4.

Description

3. The policy will be reviewed with clearly description on broadening skill, promotion, demotion, reassignment scheme, etc. Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 5.

Description

4. We will review the compensation policy & procedure which will be alligned with local law and FLA Benchmarks.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 6.

Description

5. We will make clear procedure regarding working hour after discussion with top management.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 7.

Description

6. We will review the policy & procedure on termination and retrenchment alligned with the local law.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 8.

Description

7. We will review the policy & procedure on Industrial Relation and Freedom of Association, which will clearly describe about participation Committee formation, function and other terms of the committee.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 9.

Description

8. We will review the grievance policy and procedure, where non-retaliaton and grievance records will be included for proper reporting and documentation.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 10.

Description

9. We will reform our policy after discussion with top management.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 11.

Description

10. We will reform our policy after discussion with top management.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Action Plan no 12.

Description

11. We will develop Policy and procedure on fire safety, Chemical Safety and First aid which will clearly define the responsibility towards fire safety, chemical safety procedure, First aider & Fire fighting team, etc.

Planned Completion Date

05/31/17

Planned completion date

01/06/17

FINDING NO.2

FINDING TYPE: Training (Macro)

Finding Explanation

- 1. No training is provided to supervisors and workers in Recruitment, Hiring & Personnel Development, Hours of Work, Termination and Retrenchment, Industrial Relations, Workplace Conduct, Grievance Mechanisms, and Environmental Protection.
- 2. There is no specific training provided to supervisors and the workforce on Compensation, however, updates are posted on the notice board in the local language.
- 3. No specific training is provided to workers on Workplace Conduct, however, some awareness is provided during a 30 minute Code of Conduct training. These programs are provided for batches of 20 workers at a time. At the time of assessment, approximately 20% of the workers have been covered. Training on Workplace Conduct has been provided to five out of seven production managers.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will include more detail about the employment function like; Recruitment, Hiring & Personnel Development, Hours of Work, Termination and Retrenchment, Industrial Relations, Workplace Conduct, Grievance Mechanisms, etc during the induction training for thr workers and Supervisor.

Planned Completion Date

06/30/17

Planned completion date

01/06/17

Action Plan no 2.

Description

2. We will conduct specially training on supervisor regarding Compensation.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Training porgram is going on for the Supervisors.

Action Plan no 3.

Description

3. We will continue the training program monthly and increse participant to cover all worker's. Also will covered existing department manager's.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Training porgram is going on for the workers and staffs.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

- 1. The factory does not communicate the Recruitment, Hiring & Personnel Development policies and procedures and their updates to the general workforce.
- 2. The factory does not communicate policy and procedures on Hours of Work to the general workforce, they are only informed during the recruitment process.
- 3. The factory does not communicate its policy and procedures on Termination & Retrenchment to the general workforce.
- 4. The environmental protection program is not communicated to the general workforce, including new workers.

Local Law or Code Requirement

FLA workplace Code (Employment Relationship Benchmarks ER.1 and ER.16)

COMPANY ACTION PLANS

Action Plan no 1.

Description

2. We will review the recruitment policy where the detail hiring method will be clearly described.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started the refresh training for the workers on Hours of work.

Action Plan no 2.

Description

3. All existing policies & procedure have already beenposted on the notice board. However, the new policy and procedures will also be posted after review or new development.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started the refresh training for the workers on termination & retrenchment.

Action Plan no 3.

Description

4. All existing policies & procedure have already beenposted on the notice board. However, the new policy and procedures will also be posted after review or new development.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started the refresh training for the workers on environmental protection program.

Action Plan no 4.

Description

1. We will cover the topics relating to Recruitment, Hiring & Personnel Development policies and procedures during induction trianing for the new workers and general worker's awareness training program. We will also post the topic when the training material will be finalized.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Recruitment, Hiring & Personnel Development policies and procedures and their updates have been included in the Orientation training of the workers and staffs.

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

There is no written job description for any position. Vacancies that are advertised are generally based on the nature of operations, for example, sewing machine operators, cutting machine operators, knitting machine operators.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1, Nondiscrimination Benchmark ND.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. All worker have job description of each designation in their presonal file.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Job Description is available for each position.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

- 1. Pay slips issued to workers only show the legal amount of overtime hours, not the actual amount of overtime hours worked. Management maintains two sets of pay records which make up the actual total working hours, these actual overtime hours were confirmed by worker interviews.
- 2. The factory does not compensate work done on rest days at the overtime premium rate, as required by law.
- 3. The factory does not update the service cards, which shows employment history, of individual workers. The service card provides information on used and entitled leave hours.
- 4. Participation of the Welfare Fund has not been established. As required by law, the factory is required to contribute a portion of their profits towards this fund.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 6, Section 108, Section 234; FLA Workplace Code (Employment Relationship Benchmark Compensation ER.1; Compensation Benchmark C.1, C.7, C.13)

Recommendations for Immediate Action

- 1. Ensure pay slips are accurate and include all overtime hours worked.
- 2. Ensure only one set of records is maintained that reflects actual working time and compensation.
- 3. Compensate rest days worked at the correct premium overtime rate of 200%, as required by law.
- 4. Update the service cards of individual workers.
- 5. Establish participation of the Welfare Fund, as required by law.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We are working on it to keep all the working hour and wages records in a single records.

Planned Completion Date 06/20/18

Planned completion date

01/06/17

Action Plan no 2.

Description

2. It has been decided with our top Management that if we work on rest days, then company will pay the overtime premium rate as per law.

Planned Completion Date

06/30/17

Planned completion date

01/06/17

Action Plan no 3.

Description

3. Now all worker have service book which are maintained properly. HR team also use to check randomly. Planned Completion Date 04/30/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started updating all Service book with dequired information.

Action Plan no 4.

Description

4. We already discussed with our top management about welfare fund. We are working on it. Planned Completion Date 12/31/18

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: It has been communicated to our Top Management.

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

The written content for the orientation program does not include information on wages, such as how workers will be paid based on skill levels, entitlement of bonuses, calculation for overtime compensation, payment schedules and mode of payment. According to management, the wage rates are included in the employment contracts.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We have already includes these topics - paid based on skill levels, entitlement of bonuses, calculation for overtime

compensation, payment schedules and mode of payment in induction training program. Planned Completion Date 04/30/17

Planned completion date 01/06/17

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

- 1. A review of age certificates issued by different doctors in 2011 and 2013 showed similar hand writing. All workers are recorded as 18 years old by the nurse and signed by the doctor. Based on worker interviews, 70% of interviewed workers have not met the doctor who signed their age certificate.
- 2. Ten workers from a sister factory were found working in the finishing department. According to management, the sister factory is new and does not yet have an operational finishing section. For the past four months, the sister factory has been sending garments to the assessed factory, as well as their workers to work on those garments. Employment records are not maintained on site for these workers therefore their terms of employment could not be reviewed.
- 3. The service rules drafted by the factory are not certified, as required by law.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 3; FLA Workplace Code (Employment Relationship Benchmark ER.2, ER.4)

Recommendations for Immediate Action

- 1. Ensure that all workers meet with the doctor for their age verification certificate. The worker's age should be recorded by the doctor post examination, not in advance by the nurse.
- 2. Maintain employment records on site for all workers. If workers are transferred temporarily from other factories owned by the same company, appropriate transfer letters should be maintained on file with a copy available at the site of work.
- 3. Ensure service rules (policies and procedures) are approved by local factory inspectors as required by law.

COMPANY ACTION PLANS

Action Plan no 1.

Description

. We will discuss with our top management to certified the service rules.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Action Plan no 2.

Description

1. Now the age verification certificate has been revised in a way that doctor's part must be filled in by the doctor own along with signature. HR team is also checking periodically.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Age verification system has been modified to health check and fill in the age verification form by respective Doctor.

Action Plan no 3.

Description

2. If there is any possibility to happen the same issue, then we must maintain proper documentation with system and arrange training for those workers.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: All the informations are now properly recorded about the employees and visitors working inside the factory.

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

- 1. A review of 40 sampled time records for the months of December 2015, June 2016 and August 2016 showed that 100% of workers from Cutting, Sewing, Finishing and Quality worked 10 to 15 hours a day compared to the legal limit of 10 hours a day. On June 12, 100% of workers worked for 21 hours. On August 7 and 9, 2016, all 10 sampled workers from the sewing section worked for 19 hours.
- 2. A review of time records revealed that weekly working hours in December 2015, 40 of 40 sampled workers from Quality, Cutting, Sewing and Finishing sections worked between 60 to 64 hours a week. In June 2016, 40 of 40 sampled workers from Quality, Cutting, Sewing and Finishing section worked between 60 to 94 hours a week. In August 2016, 40 of 40 sampled workers from Quality, Cutting, Sewing and Finishing section worked between 60 to 88 hours a week.
- 3. Eid holidays were provided from September 11 to 19, 2016. This nine day period included three days of declared holidays, two rest days, and four additional holidays, provided by the factory. Workers worked on three rest days (July 25, 2016, August 22, 2015 and September 5, 2016) in lieu of the additional holidays provided with the Eid holidays. While three days out of the four additional holidays have been covered, one is yet to be scheduled. Workers receive two to three days advance notice for these additional dates.

 Additionally, no compensatory days off have been provided as required by law for work done on rest days. The factory worked July 25, Aug 22 and Sept 5, 2016 which resulted in 13 days of continuous work for every employee.
- 4. The factory has not obtained written consent from female workers to work beyond 10pm, as required by law. All female workers in the sampled review work beyond 10pm regularly and on some occasions until 6.30am.
- 5. A review of time records for August 2016 revealed that for most of the month, 50% of workers from all production departments exited the factory after midnight. In particular, two of the five sampled workers from the Quality section exited the factory at 6am on Aug 7, 2016. Four of ten sampled workers (including a female worker) from the sewing section exited between 3am and 6.33am for two days. In June 2016, five out of five sampled workers from the Quality section and three out of five sampled workers from the Cutting section exited close to midnight on most days, five out of five sampled workers from the finishing section exited at 2am on June 30 and five out of ten sampled workers from the sewing section exited at 6am on June 5 and 12, 2016. All these workers reported back to work for the start of their 8am shift. These workers have not been provided with adequate rest between shifts.
- 6. The factory does not provide a break to security guards who work eight hour shifts.
- 7. The factory maintains three sets of time records. The first set reflects regular working hours and overtime hours within legal limits [No more than 52 hours (2 hours x 26 days) a month] and the 2nd set reflects 100% of the overtime hours. The third set records work done on rest days.
- 8. Manual time records are maintained for workers in the Knitting department. Records are maintained by the time keeper and workers sign these records. Records reflect shift times and not actual time of entry and exit.
- 9. Production planning is based on 10 hours of work (eight regular hours plus two overtime hours)
- 10. No time records are maintained for workers from the sister factory working in the finishing section on garments from the sister factory.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 100, 101 (a), 101 (b), 101 (c), 102, 104, 109; FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.23, ER.24; Hours of Work HOW.1, HOW.2, HOW.3, HOW.4, HOW.8; Compensation Benchmark C.5, C.6, C.7 and C.13)

Recommendations for Immediate Action

- 1. Ensure workers do not work more than 10 hours a day.
- 2. Ensure workers do not work more than 60 hours a week.
- 3. Provide workers a compensatory day off for work done on rest days.
- 4. Obtain written consent from female workers working beyond 10pm.
- 5. Provide adequate rest to workers between shifts.
- 6. Provide security guards with a 30 minute break after five hours of work or a 60 minutes break after six hours of work, as required by law.
- 7. Record all hours worked and work done on rest days in one time record; multiple records should not be maintained.
- 8. Record the working hours of workers from the knitting department via the electronic time recording system and that workers record their own working hours.
- 9. Base production planning on eight regular hours of work, not including overtime.
- 10. Maintain appropriate time records for all workers in the factory, including those that come from the sister factory.

COMPANY ACTION PLANS

Action Plan no 1.

Description

3. In general the workers are getting one day off in a week. But there is some exception to adjust the long Eid holidays just before and after the eid vacation. We are working with Production Dept to avoide this holiday work in future.

Planned Completion Date

06/30/17

Planned completion date

01/06/17

Action Plan no 2.

Description

6. We will maintain the break time for security guards.

Planned Completion Date

03/01/17

Planned completion date

01/06/17

Action Plan no 3.

Description

7. We are working on it to keep all the working hour and wages records in a single records.

Planned Completion Date

06/30/17

Planned completion date

01/06/17

Action Plan no 4.

Description

1. Our IE & Planning department working on it continuously. We gradually reducing working hour. And always try to keep it legal limit.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We are trying to eliminate the root cause against the excessive working hour.

Action Plan no 5.

Description

2. Our IE & Planning department working on it continuously. We gradually reducing working hour. And always try to keep it legal limit

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We are trying to eliminate the root cause against the excessive working hour.

Action Plan no 6.

Description

5. Now workers are enjoying the rest period during their shift time.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We are trying to eliminate the root cause against the excessive working hour and ensure rest for the workers.

Action Plan no 7.

Description

8. IT department is working on developing the HR system including time in-out for the Knitting Section workers.

Planned Completion Date

06/30/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has started maintaining the actual records.

Action Plan no 8.

Description

4. We have already taken from written concent if they work after 10.00 pm.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Consent from the female workers has been kept.

Action Plan no 9.

Description

9. We have kept overtime as voluntary and we are trying to keep overtime within 2 hour daily for the workers. Planning department has planned to 8 hour and sometimes 10 hour considering the business need. Also work study / IE department are working on it to reduce the overtime work.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has started planning for 8 to 9 hours work.

Action Plan no 10.

Description

10. We must keep record properly if any outside worker work in our factory.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17 : All the informations are now properly recorded about the employees and visitors working inside the factory.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

The factory does not identify pregnant or lactating women.

Local Law or Code Requirement

FLA workplace Code (Employment Relationship Benchmarks ER.1, and ER.16; Hours of Work Benchmark HOW.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1.P regnant / lactating worker have identifying scarf. Company has also ensured their legal right like; working hour, timely medical check-up, breast feeding facility, etc.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory is planning to provide specific color apron or scruff to pregnant or lactating women

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

- 1. The factory has a Participation Committee that is a joint worker and management committee, as required by law. Worker representatives are elected by workers and management nominates its representatives. However, worker representatives do not meet independently of management therefore are not an independent worker representative structure.
- 2. All activities of the committee are monitored by management.
- 3. Management does not provide any office space or other facility for the worker representative structure.

Local Law or Code Requirement

FLA Workplace Code (Freedom of Association Benchmarks FOA.11 and FOA.15)

COMPANY ACTION PLANS

Action Plan no 1.

Description

3. As per law this is not required. Planned Completion Date 12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: It is under discussion with the Top Management.

Action Plan no 2.

Description

1. As per local law our pc committee is elected and worker representative must meet independently with management.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory is planning to provide specific color apron or scruff to pregnant or lactating wome

Action Plan no 3.

Description

2. Our Participation Committee is working independently as management do not interfare to their activities. Moreover, workers representative can meet with the mngement to convey their word and also with the workers.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: The Participation Committee is now independent to work.

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

Workers did not received a copy of the workplace rules during orientation. As a policy, all verbal warnings that are given by management are recorded, however, workers do not sign the provided verbal warnings log to acknowledge actions taken by management.

Local Law or Code Requirement

FLA workplace Code (Employment Relationship Benchmark ER.1, ER.15, and ER.16)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We are monitoring this issue closely so that no worker are missing to provide their signature in grievance book or during any disciplinary procedure.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has started communicating the work place rules with the workers.

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

- 1. Paint brushes and fabric pieces were stored in a grievance box located in the men's toilet in the knitting section. Management stated that workers do not use the boxes and no grievances have been reported using the grievance box.
- 2. Based on worker interviews, none of the workers are aware of the confidential reporting channels. Workers stated that they approach supervisors directly for any grievance they may have. The remediation actions are then communicated verbally back to the concerned worker. However, this process includes no documentation.

Local Law or Code Requirement

FLA workplace Code (Employment Relationship Benchmarks ER.1 and ER.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

2. We will conduct effective grievance handling training about the total procedure for worker's better understanding. Also our welfare officer work in the floor and if they want then they can give any kind of complain. Now all verbal complain we keep record & give feedback to them by their written concern.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17 : Grievance mechanism and Policy & Procedure is now well communicated to the workers through Training program and PA System announcement.

Action Plan no 2.

Description

1. For broken lock, the cleaner keep the fabric part in the grievance box. Now all boxes are fully functional. Our welfare officer monitoring it.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Now grievance mechanism is functional.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

- 1. The waste material storage is unorganized. Bags containing waste paper, waste plastic, waste fabric, used cones, fused electric bulbs, glass panes, damaged wooden furniture, and iron waste were seen stored together in the open with no protective overhead cover. Additionally, there is no restriction on accessing these materials, making worker protection inadequate.
- 2. Hazard labels are not posted to identify each of the waste products.
- 3. Waste, including hazardous materials, is sold to a local scrap dealer instead of being disposed of through authorized waste handlers.

Local Law or Code Requirement

Factories Rules 1979, Rule 13; FLA Workplace Code (Health, Safety and Environment Benchmark HSE.4 and HSE.9)

Recommendations for Immediate Action

- 1. Separate and organize all waste materials. Waste material that is being stored must be separated. Provide adequate protection from weather and possible fires, and clearly mark the type and hazard level of the material.
- 2. Provide a proper storage area for the waste material and restrict access to these materials to authorized personnel only.
- 3. Post labels in the local language to identify each of the waste products.
- 4. Dispose of waste though authorized waste handlers.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will develop the waste management and Disposal policy and procedure to ensure the waste are labeled, kept properly, segrigated by type, name, hazardous/ non hazardous, etc.

Planned Completion Date

06/30/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We are organizing the staorage area.

Action Plan no 2.

Description

3. We will develop the waste management and Disposal policy and procedure to ensure that hazardous materials are not being handed over to the local scrap dealer. Fabric waste (Jhut) are use in boiler and other wastes like; Poly, paper, carton, etc will be disposed through authorized dealer.

Planned Completion Date 03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory is communicating with the organization to dispose the waste.

Action Plan no 3.

Description

2. For construction purpose we keep the westage in different places. We keep it segregately but missing label. We ensure about proper labeling.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: All the waste material are now labeled and well organized.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1. The factory only provides dining areas and not a canteen for the workers, as required by law. The factory has a kitchen but it is only used for managerial staff.
- 2. The cooks in the managerial staff kitchen are not provided with, and were therefore not using any Personal Protective Equipment (PPE; e.g., hair net, masks, gloves, aprons, shoes). Three workers were seen cutting vegetables using a stand knife and were not using any PPE (finger quards). Two of these workers had tied a piece of cloth to their thumb to prevent injuries.
- 3. The factory does not conduct health check for cooks, food servers and child care attendants.
- 4. The factory does not provide sterilized gloves, wood splints or eye wash cups in any of the first aid kits.
- 5. Workers use high stools instead of ladders to store materials in high storage spaces.
- 6. Approximately 30% of men's toilets do not properly flush.
- 7. The medical room closes at 10 pm everyday even though there are workers who work overtime. 25 workers in the knitting department work a 10pm to 6am shift on all working days. Management stated that they have an agreement with a local hospital for treatment and emergencies, however, no written agreement was available during the assessment.

Local Law or Code Requirement

The Factories Act 1979, Section 42, Section 55, Section 56, Section 57; Bangladesh Labour Act 2006, Section 59; FLA Workplace Code (Health, Safety and Environment HSE.1, HSE.7, HSE.8, HSE.18.2.1, HSE.19)

Recommendations for Immediate Action

- 1. Provide a canteen facility as required by law.
- 2. Provide PPEs (head caps, masks, gloves, aprons, shoes) for cooks in the kitchen and monitor PPE usage. Provide finger guards for vegetable cutters to prevent injuries.
- 3. Conduct health checks for cooks, food servers and child care attendants.
- 4. Provide and maintain sterilized gloves, wood splints, eye wash cup, and lotion in first aid kits.
- 5. Ensure appropriate ladders are used by workers while accessing high storage spaces.
- 6. Repair and maintain toilets.
- 7. Ensure the medical room facility is available to workers during all working hours.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will established a proper & functional canteen as per law. Planned Completion Date

08/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: It is now in discussion with management to establish the canteen.

Action Plan no 2.

Description

2. All kitchen stuff are using proper PPE with apron. For cutting vegetable, they using finger guard. Admin manager is monitoring this issue and replacing the PPE as and when necessary.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We has provided PPE to the Kitchen workers and staffs.

Action Plan no 3.

Description

3. We will conduct the health check for cook, food servers and child care attendant.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has started health check up for the respective employees.

Action Plan no 4.

Description

7. We do have proper agreement with the nearest hospital for emegency support both for day and night.

Planned Completion Date

02/28/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We has signed agreement with local hospital for emergency treatment support.

Action Plan no 5.

Description

4. We have maintain the item for first aid boxes which is required by law.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: All required first aid kits has been provided.

Action Plan no 6.

Description

5. Now store department are maintaining ladder to store materials in high spaces.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Ladder has been provided.

Action Plan no 7.

Description

6. Every toilet block have fixed cleaner. Moreover, House keeping supervisor is also checking regularly in case any maintenance

work is required. Note that, one of the male toilet (west) flush located at 2nd Floor were broken during the assessment which has already been replaced.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Now Hygiene practice of the Toilets are properly maintained.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1. The exit doors from the training room and dining rooms are a sliding type with no locking mechanism to ensure they are kept open. One of the exits from the training room was partially closed.
- 2. The factory has not installed emergency lights above the exits from the training room, dining areas, boiler room or yarn storage.
- 3. Cars were seen parked in front of the exit from dining areas.
- 4. Though smoking is not allowed inside the factory premises and signs have been displayed throughout the factory, burnt match sticks and discarded cigarettes were seen near dining areas.
- 5. A side exit from the yarn storage leads to an open area which has been dug up for building construction. No warning sign has been posted near the exit and no fencing is installed to prevent accidental falls or injuries.
- 6. The factory always announces evacuation drills; no unannounced drills are conducted.
- 7. One of the two exits from the poly pack room is locked as advised by one of the brands which the factory produces for. The only available exit door is a sliding door which is kept closed.
- 8. The kitchen used to cook lunch for staff (production and office) is not clean. At the time of assessment, it was overcrowded with objects and the gas stoves were placed on the floor which could result in accidents. Gas cylinders are stored inside the room next to the gas stoves. One stove was placed on the floor with workers moving around it, the other two stoves were on platforms. Plastic containers with cooking oil were placed next to gas cylinders.
- 9. The factory stores an excessive quantity of bags containing rejected and excess garments on the first floor of Building 2. This building also houses the yarn store and finished goods warehouse. This creates blocked passages to all storage areas, especially in the rear ends of the area. The paths to the fire alarms were also blocked with boxes, creating a fire risk.
- 10. Excessive lint build-up was noted in the electrical installations in the knitting section.
- 11. Numerous instances were observed where two or three workers were seen working at one work station. Most were sitting back to back with their stools touching each other. Some work areas in the sewing section are located near pillars, caging in the workers in the work station and restricting free access to passages.
- 12. Electric cords containing sewing machines to the mains were seen lying close to workers' feet. This could cause injury during an evacuation process.
- 13. There is only one designated assembly area that is marked for workers in front of the yarn store. Cargo trucks were seen parked in that assembly area. Pictures from past evacuation drills conducted reveal workers standing next to parked cargo trucks.
- 14. Rescue equipment is not available in the factory for workers entering confined spaces.

Local Law or Code Requirement

The Factories Act 1979, Section 42, Section 51; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.5, HSE.6, HSE.13, HSE.19)

Recommendations for Immediate Action

- 1. Ensure exit doors are open at all times.
- 2. Install emergency lights above the exits from the training room, dining areas, boiler room and yarn store.
- 3. Keep areas in front of exits clear at all times and ensure no vehicles are parked in the area.
- 4. Monitor and ensure workers do not smoke inside factory premises.
- 5. Post warning signs near the exit from the yarn store and install fencing to prevent accidental injuries.
- 6. Conduct periodic unannounced evacuation drills.
- 7. Ensure both exits from the poly pack room are kept open and unobstructed during working hours.
- 8. Ensure that the kitchen used to cook lunch for staff (production and office) is kept clean at all times. Unclutter the room and organize all gas stoves on to platforms. Gas cylinders should be stored outside the room and away from fire; store oil containers at a safe distance from stoves.
- 9. Regularly remove bags containing rejected and excess garments. Maintain adequate passages between rows to access all storage areas, especially the rear ends of the area. Access to fire alarms should be kept clear at all times.
- 10. Regularly clean all electrical installations in the knitting section of lint build up.
- 11. Ensure work stations are not crowded and every worker has free and unrestricted access to passages.
- 12. Ensure the electric cords that connect the sewing machines to the mains are fixed firmly and do not obstruct worker's access to

passages.

- 13. Provide adequate assembly areas to workers; no vehicles should be parked in assembly areas.
- 14. Provide rescue equipment and training for workers entering confined spaces.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. We will ensure the locking features for sliding door.

Planned Completion Date

02/28/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has installed locking device for the sliding doors.

Action Plan no 2.

Description

2. We have already installed exit light, emergency exit sign and focus light in the warehouse from out side.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has installed adequate emergency lights.

Action Plan no 3.

Description

5. Though that particular area has already been filled in, however, we will develop a system to do proper risk assessment and to take necessary precaution in future.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Caution sign has been put near the construction areas.

Action Plan no 4.

Description

6. When we do the evacuation drill, mostly it was announced. We will do unannounced fire drill randomly.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Factory has already conducted unannounced fire drill.

Action Plan no 5.

Description

10. In knitting section there is always create lint. Our maintenance department check it continue & clean it continue with keeping record.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Electrical equipments are cleaned and maintained properly.

Action Plan no 6.

Description

11. Already reshuffled the lay out of prodduction floor. Now its free to move from every places.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Now passage are kept free for movement.

Action Plan no 7.

Description

14. Confined space work done by third party & they are well equiped.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Third party has been well communicated to ensure rescue equipment while working in the confined space.

Action Plan no 8.

Description

3. We already share with our transport peratment to maintain the evacuation path clean.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: All the exit ways are kept free for emergency evacuation.

Action Plan no 9.

Description

4. We use to conduct awareness training monthly for the general workers and induction training for the new workers where we share this information. Also we announce daily not to smoke.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Monitoring has been increased to ensure smokeing free working environment.

Action Plan no 10.

Description

7. Now all doors are open as factory has ensured locking device as applicable.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We are now keeping all exit door open during the working hour.

Action Plan no 11.

Description

8. Safety officer has been assigned to ensure the safety of the Gas sylinder while using.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Monitoring has been increased to ensure Hygiene practice of the Kitchen and ensure safety.

Action Plan no 12.

Description

9. All walk way, fire equipment is free to use. We are monitoring it continuously.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: All passage and access to the fire equipments are kept free.

Action Plan no 13.

Description

12. Maintenance department already tied up properly the machine electrical cable.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17 : All electrical cables are kept safe for easy evacuation.

Action Plan no 14.

Description

13. Safety department have ensure the assembly area must free.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Assembly area are now free.

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1. Needle guards were seen pushed upwards on 100% of sewing machines rendering them ineffective. Eye shields on overlock machines were pushed aside or upwards by the operators and were not being used.
- 2. Mats have not been provided to approximately 40% of workers with standing jobs; these workers were seen standing bare foot. Chairs with backrests are not provided for workers with sitting jobs; workers use hard stools with some workers placing cushions on them.
- 3. Work stations are not adjustable to suit individual heights of workers.
- 4. Helmets are not provided to workers who climb to over 15 feet in height to load and unload yarn from the racks.
- 5. Lifting belts and helmets are not provided to workers involved with the loading/unloading process.
- 6. Confined spaces are not marked even though they are covered.

Local Law or Code Requirement

The Factories Act 1979, Section 37, Section 42, Section 44(2); FLA Workplace Code (Health, Safety, and Environment Benchmark HSE.1, HSE.14, and HSE.17)

Recommendations for Immediate Action

- 1. Provide training, monitor and ensure sewing machine workers do not push needle guards upwards which render them ineffective. Ensure eye shields on over lock machines are not pushed aside or upwards by the operators and that they are being used effectively.
- 2. Provide mats for workers with standing jobs and require workers to wear appropriate footwear at all times.
- 3. Provide chairs with backrest for workers with sitting jobs.
- 4. Ensure work stations are adjustable to suit individual height of workers.
- 5. Provide and ensure helmets are used by workers climbing heights while loading and unloading yarn from racks.
- 6. Provide lifting belts and helmets to workers involved with the loading and unloading process. Additionally, train, monitor and ensure usage of lifting belts.
- 7. Mark confined spaces in the local language.

COMPANY ACTION PLANS

Action Plan no 1.

Description

2. We have prepared the sitting arrangement for the worker which is including backrest.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Rubber mat and back rest has been provided.

Action Plan no 2.

Description

1. We conduct PPE training monthly. Also we announcing by PA system daily about using PPE. Our welfare officer are checking daily to use PPE.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started PPE training for the workers and staffs.

Action Plan no 3.

Description

3. Already have adjusted to suit individual height of worker.

Planned Completion Date

11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Workstation heights have been adjusted.

Action Plan no 4.

Description

4. We have already provided all kind of PPE to the workers and conducted PPE training periodically. CSR team is also monitoring to ensure use of PPE.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started PPE training for the workers and staffs.

Action Plan no 5.

Description

5. We have already provided all kind of PPE to the workers and conducted PPE training periodically. CSR team is also monitoring to ensure use of PPE.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started PPE training for the workers and staffs.

Action Plan no 6.

Description

6. We have already marked the confined space. Planned Completion Date 11/30/16

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have marked the confined spaces

FINDING NO.17

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1. Handlers did not follow safety measures when pouring oil into the power generator while it was in operation; the handler did not use spill trays or the provided PPE.
- 2. The exhaust pipe of the power generators is not insulated to prevent accidental burn injuries.
- 3. The factory has not provided rubber mats in front of electrical panel boards as a safety measure.
- 4. The factory has not installed an eye wash station or provided spill response kit in the chemical storage areas.
- 5. The factory has not installed handrails on the ladder used in the boiler room.
- 6. The factory has not installed a lightening arrestor in the building.

Local Law or Code Requirement

The Factories Act 1979, Section 38, Section 42, Section 43; FLA Workplace Code (Health, Safety and Environment HSE.9, HSE.11, HSE.14)

Recommendations for Immediate Action

- 1. Ensure safety measures are followed when transferring oil into power generators that are in operation. Ensure spill trays and PPEs are used by the handler.
- 2. Insulate exhaust pipes of power generators to prevent accidental burn injuries.
- 3. Provide rubber mats in front of electrical panel boards.
- 4. Provide a spill response kit and eye wash station in the chemical storage areas.
- 5. Install handrails on the ladder used in the boiler room.
- 6. Install a lightening arrestor in the building.

COMPANY ACTION PLANS

Action Plan no 1.

Description

4. We will provide the eye wash station at chemical storage area. Also we will arrancge spill response kit for chemical storage area. Planned Completion Date 06/30/17

Planned completion date

01/06/17

Action Plan no 2.

Description

5. We will provide the ladder with handrail to them. Planned Completion Date 12/31/17

Planned completion date

01/06/17

Action Plan no 3.

Description

1. Workers are using spill response kit in case of spillage. Moreover, they have received PPE training which factory use to conduct everymonth.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started PPE training for the workers and staffs.

Action Plan no 4.

Description

2. Now pipes of the generator are insulated by heat protector.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Now the pipes are safe from burn injury.

Action Plan no 5.

Description

. Rubber mats is already provided of the mentioned places.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Rubber mat has been provided.

Action Plan no 6.

Description

6. Already installed LPS system.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: LPS system has been installed.

FINDING NO.18

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1. Even though a notice has been displayed restricting use of the cargo lift, workers, staff and visitors were seen using the cargo lift during the assessment.
- 2. The load capacity of the lifts is not marked on or near the lifts.
- 3. The lifts are inspected every month by the supplier, however the competency certificate and authorization letter (issued by government authorities) of the inspector, was not available for review. Inspection reports covering all the parameters inspected have been recorded up to June 2016. Post June 2016, the document stating the inspection dates of the lift is recorded but detailed reports have not been recorded; therefore, it cannot be verified if all the parameters were inspected. It can also not be verified if the inspector authorized to carry out such inspections. Furthermore, the documents are completed and signed by the inspector and not by the supervisor or senior management staff of the service provider.
- 4. The factory has not marked traffic lanes or install a convex mirror, reflectors and speed breakers to assist in safe driving practices.
- 5. The factory has not implemented a lockout-tagout system.
- 6. The factory has not posted Safe Operating Procedures near machines.

Local Law or Code Requirement

The Factories Act 1979, Section 42, 44(2), 46(1), 46(2); FLA Workplace Code (Health, Safety and Environment Benchmark HSE.1, HSE.14)

Recommendations for Immediate Action

- 1. Ensure the cargo lift is used only for transporting cargo, not passengers.
- 2. Mark traffic lanes and install a convex mirror, reflectors and speed breakers.
- 3. Mark the load capacity of lifts on or near the lifts.
- 4. Ensure lifts are inspected by authorized inspectors and that details of the inspections are recorded and available at the factory.
- 5. Implement a lockout-tagout system in the factory.
- 6. Post Safe Operating Procedures near machines in the local language.

COMPANY ACTION PLANS

Action Plan no 1.

Description

6. We have safety operating porcedure hang with the machine. Please see the attachment.

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: Machine SOP for all machines are now available.

Action Plan no 2.

Description

1. We will noticed for instruction of using cargo lift.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Action Plan no 3.

Description

2. We will marked the load capacity out side of the lift.

Planned Completion Date

02/28/17

Planned completion date

01/06/17

Action Plan no 4.

Description

4. In entrance of the factory building, there have traffic lane. Also driver are drive safely in the factory compound.

Planned Completion Date

04/30/17

Planned completion date

01/06/17

Action Plan no 5.

Description

3. We will communicate with the supplier & inspection team about certificate & Proper inspection report.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17 : Already communicated to the supplier for Maintenance certificate.

Action Plan no 6.

Description

5. We will maintain properly the lockout-tagout system. Planned Completion Date

04/30/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have communicated to the Maintenance team to introduce.

FINDING NO.19

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

- 1. Out of 1150 workers, 180 have participated in the PPE training programs. This program is conducted in batches of 20 workers and is conducted every month.
- 2. The factory has a team of 73 fire rescuers who are responsible for ensuring safe evacuation during an emergency. However, the team is not trained on how to rescue special categories of workers.
- 3. The factory does not provide specific training on Health & Safety to the workforce; however, some awareness is provided. Practice situations are not created during evacuation procedures to ensure the team practices their responsibilities. No maintenance safety training is conducted.
- 4. The factory does not provide ongoing training for PPE and Fire Safety. Machinery and electrical safety, ergonomic, and work area safety is not included in any training programs.
- 5. The factory has conducted some awareness program on Health & Hygiene for 25 out of 1150 workers, with plans to cover the rest of the workforce.
- 6. The factory has not conducted a fire risk assessment.
- 7. There are no measures to protect the reproductive health of employees through minimizing exposure to workplace hazards
- 8. There is no procedure on protecting against retaliation for workers who raise health and safety concerns.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, ER.31; Nondiscrimination Benchmarks ND.8; Health, Safety and Environment Benchmarks HSE.5, HSE.9, HSE.12, HSE.14)

COMPANY ACTION PLANS

Action Plan no 1.

Description

4. We use to keep all training records with content. Also we use to conduct training periodically for new workers and refresh training to the existing worker.

03/31/2017

Planned completion date

01/06/17

Action Plan no 2.

Description

6. We applied to fire service cevil defence to performed a fire risk assessment and these Risk Assessment report covers every aspect of fire risk in the factory along with necessary precautions required.

Planned Completion Date

06/30/18

Planned completion date

01/06/17

Action Plan no 3.

Description

7. We will do more risk assessment to minimize the hazard, which can reduce the reproductive health risk of the worker. Planned Completion Date

12/31/17

Planned completion date

01/06/17

Action Plan no 4.

Description

8. We will made a retaliation procedure. In that procedure we must include of protection against retaliation for worker who raise health and safety concern.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

Action Plan no 5.

Description

1. We will increse the participant of the training & try to cover all worker in a year Planned Completion Date 12/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: We have started PPE training for the workers and staffs.

Action Plan no 6.

Description

2. We have already assigned the responsibility of fire fighting Team and Rescue Team members who are trained from Fire Service and Civil Defense. However, we'll arrange training program for new team members and refresh training for the existing team members.

Planned Completion Date

08/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: The topic has been included in the Fire Safety training.

Action Plan no 7.

Description

3. We use to conduct monthly awareness training for the general workers and induction training for the new workers based on the category of risk in their work space. However, we will plan training for all workers to cover the Health & Safety training on Chemicals, fire safety, machine safety, hygiene, fall protection, workplace accidents etc.

Planned Completion Date

03/31/17

Planned completion date

01/06/17

Company Action Plan Update

08/08/17: The topic has been included in the Fire Safety training.

Action Plan no 8.

Description

5. We will conduct general health & hygiene program to all worker periodically.

Planned Completion Date

12/31/17

Planned completion date

01/06/17

<u>Company Action Plan Update</u> 08/08/17 : Training on Health and Hygiene has been started.