



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Hugo Boss AG
COUNTRY: Bangladesh
ASSESSMENT DATE: 12/21/16
ASSESSOR: Insync Global
PRODUCTS: Apparel
NUMBER OF WORKERS: 415

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 does not have a policy on Hiring & Personnel Development, Retrenchment, Industrial Relations, or Environmental Protection. However, there are some systems in place to manage Environmental Protection.
2. The factory does not have procedures on Recruitment, Hiring & Personnel Development, Hours of Work, Termination & Retrenchment, Industrial Relations. However, there are some systems in place to manage certain components of Personnel Development (performance evaluations and promotions), Hours of Work, Termination, and Industrial Relations.
3. The factory's Compensation procedures do not include any information on the calculation of the festival bonus or the provision of maternity leave after a second child.
4. The factory's policy on Hours of Work does not include information on extraordinary business circumstances.
5. The factory's policy on Termination does not define reasons for termination of employment, such as resignation, retirement, physical inability, or death.
6. The factory's Workplace Conduct & Discipline procedures do not define actions taken as a result of misconduct, the persons responsible for taking action, or the timelines for taking action. The procedures do not include the requirement to record all warnings and disciplinary actions, either.
7. The factory's Environmental Protection procedures do not include steps for managing its environmental impact to its surroundings, procedures to enable workers to raise environmental concerns, procedures for reporting environmental emergencies, or procedures for protections for workers who allege environmental violations.
8. Workers use of footwear is restricted, while supervisors and management are allowed to use footwear inside work areas. However, the factory's Health & Safety policy does not include a restriction on the use of footwear by workers inside work areas
9. The factory's Health & Safety procedures do not contain the framework for a comprehensive Health & Safety management system, including:a. Health & Safety procedures that address employee safety and the risks present in the factory;b. Responsibilities of designated personnel, such as: a list of the employees (names and/or titles) responsible for managing fire equipment; employees' duties regarding fire response; a list of employees responsible for responding to emergencies (with their qualifications/certifications-names and/or titles);c. Procedures that enable workers to raise Health & Safety concerns;d. Procedures for reporting death, injury, illness, and other Health & Safety issues;e. Protections against retaliation for workers who allege Health & Safety violations.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.7, ER.19, ER.23, ER.25, ER.27, ER.28, ER.29, ER.30, ER.31, and ER.32; Health, Safety & Environment Benchmark HSE.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has updated the policy on Hiring & Personnel Development, Retrenchment, Industrial Relations, & Environmental Protection as per FLA Workplace Code .

Planned completion date

04/19/17

Action Plan no 2.

Description

The factory has updated the policy procedure on Hiring & Personnel Development, Retrenchment, Industrial Relations, & Environmental Protection.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory has included Compensation procedures information on the calculation of the festival bonus maternity leave after a second child.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 4.

Description

The factory has included the information on extraordinary business circumstances in Hours of Work policy.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 5.

Description

The factory has included the information of resignation, retirement, physical inability, or death in termination policy.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 6.

Description

The factory has included disciplinary actions, responsible persons for taking action , timeline & all warnings in Workplace Conduct & Discipline procedures.

Planned completion date

04/19/17

Action Plan no 7.

Description

The factory has included all the Environmental Impact assessment its surrounding area in to the Environmental Protection procedures also are keep record regularly by environment person.

Planned completion date

04/19/17
Company Action Plan Update
05/08/17 : completed

Action Plan no 8.

Description

The factory has included Workers use of footwear inside in work areas in Health & Safety policy.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 9.

Description

The factory has already created a standard policy & procedures on Health & Safety Management System where we included safety risk of employee, safety concern person's name, responsibly persons of fire, fire equipment list, reporting procedures of death, injury, illness & other health & Safety Issue. We also retaliation for workers who allege Health & Safety violations.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The orientation training provided to new workers does not cover bonuses, Freedom of Association, or Workplace Conduct & Discipline. Furthermore, workers do not receive written documentation that substantiates all the issues covered in orientation or a copy of the workplace rules.
2. Neither the trainer's name and signature nor the workers' department name and employment card number are recorded in the attendance records for orientation training.
3. The factory does not provide specific training to supervisors or ongoing training to workers on any of the Employment Functions. However, the factory recently began monthly training sessions for supervisors and the general workforce on their buyers' Codes of Conduct (including the FLA-affiliate's). Some awareness of the Employment Functions is provided during these training programs (last conducted on December 15, 2016 for supervisors and December 12, 2016 for workers). So far, 61 out of 79 supervisors and 85 out of 571 workers have been trained. The factory also recently began a Health & Safety training program for workers. Not all workers have received training yet; for example, 85 out of 571 workers have been trained on general Health & Safety and 90 out of 571 workers have been trained on the use of PPE. This training will be repeated once all workers are trained.
4. The factory does not provide specific training to the relevant HR personnel and administrative staff on Workplace Conduct & Discipline. However, some awareness is provided during the monthly Code of Conduct training; eight out of 15 HR and Compliance staff members have been trained so far.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, ER.15, ER.17, and ER.27; Compensation Benchmark C.17; Health, Safety & Environment Benchmark HSE.8)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has included bonuses, Freedom of Association, Workplace Conduct & Discipline procedure in worker orientation training Workers also are receive their written orientation training copy.

Planned completion date
04/19/17
Company Action Plan Update
05/08/17 : completed

Action Plan no 2.

Description

The factory has kept records trainer's name, signature, workers' department name , employment card number & attendance records include in the orientation training.

Planned completion date
04/19/17
Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory is providing specific training to supervisors ongoing training to workers on any of the Employment Functions.

Planned completion date
04/19/17
Company Action Plan Update
05/08/17 : completed

Action Plan no 4.

Description

The factory is providing specific training to the HR People relevant HR personnel on Workplace Conduct & Discipline.

Planned completion date
04/19/17
Company Action Plan Update
05/08/17 : completed

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

1. The factory does not communicate its policies and procedures or their updates to the general workforce regarding Recruitment, Hiring & Personnel Development, Retrenchment, or Environmental Protection.
2. The FLA Code of Conduct is posted in the local language (Bangla). However, the FLA affiliate's Code of Conduct is posted in English, not in the local language.
3. The factory has not communicated with workers regarding the function of the newly created Participation Committee, which is responsible for maintaining employer and worker relations.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 205; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, ER.25, ER.29, and ER.30)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory is communicating about updated policies and procedures with workers' regarding Recruitment, Hiring, Personnel Development, Retrenchment, & Environmental Protection by the training & Committee meeting

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has already posted the HUGO BOSS Social Standards in local language in factory premises.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory is communicating by training with workers regarding the function of the newly created Participation Committee, which is responsible for maintaining employer and worker relations.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Responsibility & Accountability (Macro)

Finding Explanation

The person(s) responsible for each Employment Function is not clearly defined in writing.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has defined in writing a responsible for all employment functions.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. There are no job descriptions available for workers when they need to be hired.

2. Performance reviews are not conducted for all workers. Machine operators receive performance reviews, while workers from the

finishing and packing sections do not.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.29; Non-Discrimination Benchmark ND.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Now the factory provides job description for workers when they need to be hired.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory maintains performance reviews for all workers & keep record properly.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. Four out of 18 electricians and three out of six mechanics are designated as staff and are therefore not compensated for overtime hours worked. These employees are not considered workers; although staff are paid higher salaries than workers, they do not receive overtime compensation. In August 2016, one of the two sampled electricians worked up to 17 hours of overtime without compensation. In November 2016, one of the two sampled electricians and one of the two sampled mechanics worked one hour of overtime without compensation.
2. The workers' service books are not updated with leave information.
3. The factory's written agreements with the security and housekeeping service providers state that all legal benefits should be provided to the workers, but do not provide information on the specific benefits that will be provided. In practice, all legal benefits were provided. The agreements do not give the factory the power to directly pay the security guards and housekeepers' wages, either. As a result, the factory does not have a direct employment relationship with these workers.
4. The factory has not provided a canteen, as required by law.

Local Law or Code Requirement

Bangladesh Factories Rules 1979, Rule 57; Bangladesh Labour Act 2006, Sections 6 and 92; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, and ER.6; Compensation Benchmarks C.1, C.7, and C.15; Hours of Work Benchmark HOW.1)

Recommendations for Immediate Action

Compensate maintenance workers (electricians and mechanics) for all overtime hours worked. Retroactively compensate any maintenance workers who did not receive the proper compensation within the last 12 months.

COMPANY ACTION PLANS

Action Plan no 1.

Description

According to Bangladesh Wage Gazette -2013, Electrician & Mechanic Wage were BDT-10,900 and OT rate are 67.3 if they work daily

2Hrs OT & total monthly OT are 52 hrs. (67.3X 52=3,500).& their monthly salary 10,900+3,500 = 14,400 BDT). But we are paying minimum salary BDT-15000 (also we are paying Electrician & Mechanic maximum salary BDT-28000) which is more than Bangladesh Wage Gazette-2013.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory includes leave information in workers' service book & update regularly.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory has kept written agreement to Security & housekeeping service providers and they are also are keeping service book and their payment copy.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 4.

Description

The factory has stated canteen facility to the all workers.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The time recording software is not correctly recording workers' time. A review of workers' time cards showed that all workers clocked in between 7:55 AM and 8:00 AM for the shift starting at 8:00 AM. There was not a single instance where any of the 571 workers clocked in after 8:00 AM or before 7:55, although some workers stated during interviews that they arrive and begin work 15 to 20 minutes early and it is unlikely that no workers ever arrive late. Similarly, a review of 45 sampled time cards showed that workers clocked out between 5:01 PM and 5:04 PM for the shift ending at 5:00 PM and between 7:01 and 7:04 after working overtime. However, assessors observed that workers clocked out 5 to 10 minutes after the end of their shifts. The regularity of the time stamps indicates that the time recording software is programmed to clock workers out at certain times. Furthermore, all workers (including the outsourced security guards and cleaners) use the same time-recording software but the time cards for the outsourced security guards and cleaners record the hour, minute, and second the worker clocked in or out, while regular factory workers' time cards only record the hour and minute.
2. There is no system in place to identify pregnant or lactating women within the working hours records.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER.23; Hours of Work Benchmark HOW.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

the factory states, that time recording software is now fixed and gives exact times.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory provides different colored aprons to identify pregnant or lactating women worker by working time.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

1. A review of five sampled personnel files for workers who took authorized leave and never returned to work revealed that the factory issued written warnings followed by a letter of termination, as required by law. However, the letter of termination does not include a date for workers to collect their termination dues and the factory has not yet calculated the termination dues payable. As such, the dues have not yet been paid.
2. As stated by management, termination dues are paid the month after termination, irrespective of the date of termination. Indeed, assessors reviewed the files of five resigned workers and found that the date of termination of employment was between October 9 and October 12, 2016 and these workers were paid on November 7, 2016. This practice does not comply with local law, which states that workers must receive termination payouts within seven days of the last day of employment.
3. Attendance records for days worked between the end of the pay period and the last day of employment are not documented along with pay records, although they are documented elsewhere. This makes it difficult to verify payable wages when calculating termination dues. The payment date of termination dues is not included in the pay records either.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 123; FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.19, and ER.32; Compensation Benchmarks C.1 and C.4)

Recommendations for Immediate Action

1. Include a date for workers to collect their termination dues on letters of termination. Calculate and make dues available by that date.
2. Pay workers' wages and unused leave payments within seven days of the last day of employment, as legally required. Pay workers' gratuity and bonuses within 30 days of the last day of employment, as legally required.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has created payment date of termination dues workers payment sheet in the pay records.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory pays now all termination dues in seven working days.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory has created payment date of termination dues workers payment sheet in the pay records.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. The factory formed a Participation Committee on November 30, 2016. Committee members include management representatives and elected worker representatives.
2. The factory has not provided any office space or other facilities to the Participation Committee to carry out its function. In November 2016, one meeting was conducted in the dining hall.
3. The factory has a Grievance Committee comprised of seven members (four workers and three members of management). The four worker representatives were appointed by management rather than being freely elected by workers.

Local Law or Code Requirement

FLA Workplace Code (Freedom of Association Benchmarks FOA.10, FOA.11, and FOA.15)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has formed a participation committee as per BLA 2006 section 205 Worker representative freely elected by the worker & management representative elected by top management.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has established a grievance committee, worker representatives elected by the worker & management representative elected by management.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

Construction work is going on and the factory will provide a office space the participation committee to carry out their function.

Planned Completion Date

05/30/17

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : in progress

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. As a disciplinary measure, the factory sends warning letters to the homes of workers who are absent without authorization for more than seven days. Copies of these letters are kept in workers' personnel files. However, these letters are not signed by workers because they were returned by the postal department (the addresses were not found), so workers could not respond. So far, written warnings have not been issued for any other misconduct.
2. The factory's policy on Hours of Work states that deductions can be made from workers' wages if they report late for work. This policy has not been implemented.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.27; Harassment or Abuse Benchmark H/A.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Most of the workers have received their warning letter, but some worker haven't received as their warning letter have returned by the postal department. So the factory keeps the record in personal file with register.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has never ever deducted of wages for late, but if they late we are deducted only Attendance bonus (not mandatory BLA) which is included our policy.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. The factory does not have a principle of non-retaliation against workers who make complaints.

2. The factory does not record the name of the person(s) responsible for taking action, nor the timeline for taking action in their grievance records.
3. Currently, the grievance box is only opened once a month. This could discourage workers from using the box, as their grievances may not be promptly addressed.
4. No paper or pen has been provided for the grievance boxes. Currently, workers must obtain paper from the production office or bring written grievances in from home.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has opened a register for worker who make complaints.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory records now the name of the person responsible for taking action as well as the timeline for taking action in their grievance records.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory ensures, that they open the grievance box on weekly basis.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 4.

Description

The factory has provided paper and pen near of grievance boxes.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

The factory applied for an environment clearance certificate (a certificate issued by the Department of Environment to certify that the factory complies with government regulations) on November 24, 2016, but has yet to receive it.

Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmark HSE.4)

Recommendations for Immediate Action

Follow up and obtain an environment clearance certificate from the Department of Environment.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Not applicable.

The Dying and Washing factory certificate was issued by the Department of Environment.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not posted signs to restrict the use of the elevators in the event of fire.
2. Clothing racks are obstructing access to aisles from about 80% of work stations in the sewing area. The pressing (ironing) workers access was blocked on one side by a table and on the other side by a clothing rack on which garments were hanging. There were three instances where the in-line pressing workers in the sewing section on the second floor had no access to aisles because their path was completely blocked with clothing racks.
3. The factory has not commissioned a third-party expert to conduct a fire risk assessment.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 72; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5, and HSE.14)

Recommendations for Immediate Action

1. Post signs to restrict the use of elevators in the event of fire.
2. Ensure all work stations, particularly the sewing and pressing stations, have access to the aisles. Keep aisles clear of obstructions.
3. Commission a third-party expert to conduct a fire risk assessment.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has posted signs to restrict use area of elevators in the event of fire.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has kept aisles free, so that work stations particularly cutting ,sewing & pressing section are now easily accessible.

Planned completion date

Action Plan no 3.

Description

The factory has commissioned a third-party expert to conduct the fire risk assessment.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There are no signs posed near the elevators to indicate the maximum working load.
2. There are no signs indicating whether the elevators are intended for cargo and/or human transport.
3. The elevators and mechanical lifting devices do not have appropriate safety mechanisms (auto lock and auto stop in case of power failure). The safety mechanisms were being installed at the time of the assessment.
4. Safety instructions are displayed on the walls in work areas rather than next to the machines. Furthermore, there are no instructions posted for the auto spreader and cutter, button indexing machine, auto shirt finishers, and auto folder machines.
5. Traffic lanes and walk paths are not marked inside the factory premises.
6. The factory has not installed any visual management, such as indicators, convex mirrors in dead ends, reflectors, etc., to ensure safe driving practices on factory premises.
7. Workers do not wear shoes inside the work areas; instead, they work barefoot. This poses a risk of injury from stepping on dangerous objects (e.g. broken needles) or exposure to electric shocks from machinery.
8. There are no warning signs posted near the confined spaces (two underground water tanks).
9. The factory has not provided PPE to maintenance workers cleaning the water trenches at the entrance of the main building (No. 1).
10. During the assessment, workers were standing inside the water trench while cleaning the trenches without shoes or aprons.
11. The factory has not implemented a lockout-tagout procedure.
12. The fastening buckle is rusted on two out of four lifting belts.
13. The locking mechanism on the stepladder (double stand ladder) is broken; instead, a cord was being used to tie the legs to prevent movement.
14. The factory does not provide safety information to contractors used for maintenance work.
15. The factory does not provide standing workers with anti-fatigue mats.
16. The checking tables and pressing tables are not adjustable to suit the individual height of workers.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Sections 64 and 69; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.7, HSE.8, HSE.14, and HSE.17)

Recommendations for Immediate Action

1. Post signs near elevators indicating maximum working load.
2. Post signs near elevators indicating their intended use (cargo or human transport).
3. Install auto stops and auto locks for all elevators and mechanical lifting devices.
4. Post safety instructions in the local language for the autospreader and cutter, button indexing machine, auto shirt finishers, and auto folder machines. Ensure that all safety instructions are posted immediately next to the machines.
5. Mark traffic lanes and paths on the factory premises.
6. Install indicators, convex mirrors at dead ends, reflectors, etc., to ensure safe driving practices on the factory premises.
7. Allow workers to wear shoes to work or provide workers alternative footwear (free of charge) for use at work in order to protect them from workplace injury.
8. Post warning signs near the two underground water tanks indicating them as such.
9. Provide PPE (shoes and aprons) to workers who clean the water trenches at the entrance to the main building.
10. Establish and implement a lockout-tagout procedure.
11. Replace fastening buckles on the two lifting belts with rusted buckles.
12. Install an alternate locking mechanism on the stepladder (double stand ladder) to prevent the legs from moving when in use.
13. Provide safety information to contractors used for maintenance work.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has posted signs near elevators maximum working load.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has posted signs near elevators intended for cargo or human transport.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory has installed the safety mechanisms.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 4.

Description

The factory has posted safety instructions in the local language for the auto spreader and cutter, button indexing machine, auto shirt finishers, & auto folder machines.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 5.

Description

The factory has marked the traffic lanes and paths on the factory premises.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 6.

Description

The factory has ensured safe driving practices in manually by security guard on the factory premises.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 7.

Description

The factory has provided socks to worker for their safety reason.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 8.

Description

The factory has posted warning signs for safety near of two underground water tanks.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 9.

Description

The factory has provided PPE shoes ,hand gloves & aprons to the water trenches clean workers.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 10.

Description

The factory has established a lockout-tag out procedure.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 11.

Description

The factory has bought 6 new lifting belts.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 12.

Description

The factory has bought 2 new ladders.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 13.

Description

The factory has provided safety information to contractors used for maintenance work.

Planned completion date

04/19/17
Company Action Plan Update
05/08/17 : completed

Action Plan no 14.

Description

The factory has provided standing workers with anti-fatigue mats.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 15.

Description

The checking table and pressing table operators are comfortable to work on standing & already the table height has adjusted.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There are no eyewash stations installed in the two oil storage areas.
2. There are no hazard labels posted on the engine oil containers.
3. Except for a sponge and bucket, no equipment or PPE (hand gloves, eye shields, masks, and collection trays) is provided in the spill response kit in the two oil storage areas.
4. In the diesel room, 10,000 liters of diesel is stored next to the generator, posing a risk of explosion and fire.

Local Law or Code Requirement

Bangladesh Labour Act 2006, Section 78; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.6, HSE.7, and HSE.9)

Recommendations for Immediate Action

1. Install eyewash stations in all oil storage areas.
2. Post hazard labels on engine oil containers.
3. Provide hand gloves, eye shield, masks, and collection trays in the spill response kit in the oil storage areas.
4. Move any diesel containers out of the generator room. Store diesel in a designated, well-ventilated chemical storage room with restricted access.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has provided emergency eyewash water bottle in all oil storage areas.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has posted hazard labels sign on engine oil containers.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory provides hand gloves, eye shield, masks, apron , spill response kit in the oil storage areas.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 4.

Description

The factory keeps the diesel storage for generator outside from our factory.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Contact information for emergency medical response is posted near the factory's main entrance gate and in the medical room, but not in work areas.
2. There is only one child care attendant. No arrangements have been made should she be absent from work.
3. Only one cup is provided at the drinking water stations for workers to share.
4. The building structure certificate, issued on September 4, 2016, is available for the main production building but not for the other four buildings. As stated by management, all other buildings were externally inspected in October 2016, but the factory has yet to receive the certificate. The factory does not have a copy of the building inspector's competency certificate, either, as legally required.
5. The risk assessment was more of an impact assessment than a risk assessment. It did not define the probability, frequency, or severity of risks. For example, it did not cover the fire risk in the diesel room caused by the large quantity of diesel (10,000 liters) stored near the generator. The risk assessment also did not cover risk management procedures (except for the provision of PPE).

Local Law or Code Requirement

Bangladesh Labour Act 2006, Sections 61 and 94; Bangladesh Factories Rules 1979, Rule 25; FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety & Environment Benchmarks HSE.1, HSE.4, HSE.6, and HSE.23)

Recommendations for Immediate Action

1. Post contact information for medical response in work areas.
2. Hire a second child care attendant so that there is an attendant available at all times.
3. Provide enough cups so that workers do not have to share.
4. Follow up with the Factories Inspectorate and obtain the missing building structure certificates and a copy of the external assessor's competency certificate.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has posted contact information for medical response in all work areas.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 2.

Description

The factory has hired second child care attendant for child care room.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 3.

Description

The factory has provided enough cups to drinking water stations.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 4.

Description

The factory has collected missing building structure competency certificates from external assessor's .

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed

Action Plan no 5.

Description

The factory has provided all PPE & safety measure in diesel room.

Planned completion date

04/19/17

Company Action Plan Update

05/08/17 : completed