# INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Fast Retailing Co., Ltd.

COUNTRY: Cambodia ASSESSMENT DATE: 10/18/17 ASSESSOR: FLA China

PRODUCTS: Apparel

NUMBER OF WORKERS: 4552

# **FLA Comments**

Exit Language: This was not a major factory for Fast Retailing production. It produced around 190,000-200,000 pieces in total, accounting for an approximate average of 5-10% of the factory's production capacity, until November 2018. There is no additional production planned for 2019. There is no risk of retrenchment associated with Fast Retailing's exit because the factory is able to replace Fast Retailing production with orders from other brands. Fast Retailing will not be able to pursue remediation for the noncompliance identified in this report, nor are there currently any 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 does not have policies for Recruitment, Hiring & Personnel Development, Termination and Retrenchment, Industrial and Labor Relations, Workplace Conduct & Discipline. ER.1, ER.27, ER.32
- 2. The factory does not have procedures for Personnel Development, Retrenchment, Compensation, Hour of work, Industrial and Labor Relations, Grievance System. ER.1, ER.19, ER.23, ER.25, ER.27, ER.28, ER.29, ER.30, ER.32
- 3. here is no written policies and procedures regarding performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement and/or disagreement from employees in writing, and that follow all local legal requirements. There are no policies and procedures for promotion, demotion, or job reassignment. ER.29, ER.30
- 4. The factory did not yet develop a specific Environmental Protection Procedures. ER.1
- 5. Environmental Policy had been reviewed was issued in Sept 26, 2017 and renewed in Sept 26, 2017, however the factory did not yet a detail procedure related to Environmental Protection in place for renew and update. ER.31. HSE.1
- 6. The factory does not yet having in place a specific EHS procedure in which detail the step to manage and implement the EHS program. ER.31
- 7. The factory has in place some safety operation procedure on electrical safety, but no specific SOP applicable for machinery maintenance, Lockout-tag Out, Work at Height, or Confined space. ER.31, HSE.1
- 8. The factory has in place the emergency contact number for the workers to report in case of environmental incident but it was not in detail such as: ER.1, ER.31
- 1. What steps need to be performed when there is an emergency case,
- 2. What type of PPE need to be used,
- 3. Where to recall for first aid emergency support, which hospital need to be contacted if mass of workers impact on the emergency cases such as chemical impact of smoke fire spread up in case of fire.
- 4. Who is the person in charge of answer to the media in such a case?
- 5. How to recover production during this emergency case, how to report to the client in case production need to be stopped.
- 9. The specific SOP applicable for construction, service maintenance provider on safety was not yet developed to request these service must follow the safety requirement while performing their work in the factory premise. ER.1

# Local Law or Code Requirement

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

### Action Plan no 1.

#### **Description**

- 1. The factory already improved. they have set up the policy for Recruitment, Hiring & Personnel Development, Termination and Retrenchment, Industrial and Labor Relations.and will update for every 6 months review.
- 2. The factory already set up the procedures for Personnel Development, Retrenchment, Compensation, Hour of work. The factory will update for every 6 months review for all procedure.
- 4. The factory already set up procedure for environmental protection in the factory. The factory will update for every 6 months review for all procedure.
- 5. The factory already set up environmental policy for the update on 06-04-2018 and will continue for new update on 06-10-2018. The factory will update for every 6 months review for all policy.
- 6. Based on document review, the factory established a specific EHS procedure in which detail the step to manage and implement the EHS program on Oct 9, 2018.
- 7. The factory already set up the hight working procedure for worker to understand it. They will provide training about procedure for worker to pay attention working.
- 8. The factory already establish the emergency contact and training to the supervisor to understand below: 1. when the establish emergency case happened to contact 2.how to use the PPE 3.the factory will make the list of emergency contact and resposible person post at production area.
- 9. The factory already set up lock out -tag out policy for safety construction. The factory has arrange meeting with factory engineer to talk about lock out-tag out safety during maintenance in production area

<u>Planned completion date</u> 08/17/18

#### FINDING NO.2

#### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Training (Macro)

### **Finding Explanation**

- 1. There is no training for general workforce, supervisors and managers on the FLA Workplace Code and Benchmarks. There is no specific training for supervisors and managers on Personnel Development, Retrenchment, Industrial Relations, and Workplace Conduct & Discipline. ER.15, ER.17
- 2. There is no ongoing training provided to the general workforce regarding Recruitment, Hiring & Personnel Development, Termination and Retrenchment, Industrial/ Labor Relations, Workplace Conduct & Discipline, Grievance System, Health and Safety and Environment. ER.1
- 3. The orientation training provided to new workers does not cover the factory's HR policies. Furthermore, workers are not provided with complete training materials during orientation . ER.1, ER.15
- 4. The Environmental Protection training was provided only for the supervisor and cleaners and the supervisors verbally trained back to the workers, but no records signed by the workers in place to prove they had been trained in Environmental Protection. The training was focused of waste management while other environmental protection topics were missing such as of water and energy. ER.2
- 5. The factory does not provide the training for workers who operate machinery on Laser cutting machine, Laminate machine, Edge Folding Machine. HSE.14
- 1. The factory does not provide safety training for maintenance workers on Lockout-tagout, Confined Space and Work at Height and Asbestos was not yet fully developed. HSE.14
- 6. The workers are able to refuse work under unsafe conditions as per management interview, however in the EHS policy no such a term is mentioned or trained for the workers. The workers are not aware of this term. HSE.16

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15 and ER.17; Health, Safety & Environment Benchmarks HSE.14 and HSE.16)

#### COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Based on document review, there is no specific training for supervisors and managers on Hiring & Personnel Development,

Retrenchment, Industrial and Labor Relations, Workplace Conduct.

- 2. Based on document review and management interview, the factory does not improve it yet. The factory only provided ongoing training for some workers in terms of Recruitment, Termination, Discipline, Grievance System, Health and Safety and Environment.
- 3. All training new orientation worker the factory conducted with worker about factory HR policies. The factory will keep and update training meeting for every 6 months.
- 5. Now the factory have set up procedure and provide training to worker about policy as well.

Planned completion date

08/17/18

#### FINDING NO.3

### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Communication & Worker Involvement (Macro)

#### **Finding Explanation**

- 1. The factory does not communicate the following policies and procedures and their updates to the general workforce: Recruitment, Hiring & Personnel Development, Termination & Retrenchment, Industrial Relations and Grievance System. ER.1, ER.28, ER.29, ER.16, ER.32
- 2. The factory does not involve any worker representatives in the development of the policy and procedures for any of the Employment Functions. ER.25
- 3. The factory does not fully or effectively communicate its environmental protection program to the general workforce. ER.31
- 4. The factory's Workplace Conduct & Discipline policies and procedures are not communicated to the general workforce. The factory has procedures on Discipline (in the company regulation), but worker representatives are not involved in their development and evaluation.
- 5. The factory's Grievance procedure is available; however, the factory did not involve any worker representatives in the development of this procedure. Furthermore, worker representatives are not included in the evaluation of the grievances collected. ER.25

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, ER.25, ER.28, ER.29, and ER.31 and ER.32)

### COMPANY ACTION PLANS

#### Action Plan no 1.

### **Description**

3. Based on document review and management interview, the factory only provided training of environmental protection program to supervisors.

### Planned completion date

08/17/18

### FINDING NO.4

## SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Review Process (Macro)

#### **Finding Explanation**

The factory does not regularly review policies and procedures on Recruitment, Hiring & Personnel Development, Hours of Work, Compensation, Termination & Retrenchment, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Environmental Protection, and Health & Safety. The last review was conducted in July 2017. ER.1, ER 29, ER 30, ER.31

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.29, ER.30, and ER.31)

### **COMPANY ACTION PLANS**

### Action Plan no 1.

#### **Description**

The factory has to check and review all policies and procedures but not mention the name who responsible for undate and approved.

# Planned completion date

08/17/18

### **FINDING NO.5**

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Responsibility & Accountability (Macro)

### **Finding Explanation**

- 1. The factory has not clearly defined, in writing, the person(s) responsible for Recruitment, Hiring & Personnel Development, Hours of Work, Termination & Retrenchment, Workplace Conduct & Discipline, Industrial Relation and Environmental Protection except Health & Safety. The responsibilities are partly and informally defined. ER. 1
- 2. The factory does not clearly identify the person with ultimate responsibility/accountability within this factory. The responsibilities are partly and informally defined. ER.1

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1)

# **COMPANY ACTION PLANS**

### Action Plan no 1.

### Description

2. Based on document review, the factory clearly identify the person with ultimate responsibility/accountability within this factory.

# Planned completion date

08/17/18

## **FINDING NO.6**

### IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Recruitment, Hiring & Personnel Development

#### **Finding Explanation**

- 1. The factory does not have any job descriptions for any positions at the factory. ER.1
- 2. The factory has employed all workers for a two month probation period. After the two months probation period, they are given a three months Fix Duration Contract (FDC), this FDC is renewed consistently every three months for all workers. ER.9
- 3. The job application forms for all positions include questions on race, nationality, parent name and gender. Although there is no evidence of this information being used for discriminatory purposes, this practice poses a risk of discrimination. ER.3, ND.2.1
- 4. There is not a system to review the performance of new workers during their probation period. ER.1

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.3; Nondiscrimination Benchmark ND.2.1)

### Recommendations for Immediate Action

- 1. Convert workers that have been hired on multiple FDC for more than two years to permanent workers under UDC contracts, as legally required.
- 2. Remove all discriminatory questions regarding marital status, sexual orientation, gender, race, religion, age, health status, marital status, disability, pregnancy, nationality, political opinion, social group, or origin from the job application forms.

### **COMPANY ACTION PLANS**

#### Action Plan no 1.

#### Description

1. Based on document review and management interview, the factory only has job descriptions for HR, Accountant, Shipping and CSR position.

# Planned completion date

08/17/18

### FINDING NO.7

### IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Compensation

#### Finding Explanation

- 1. Maternity leave compensation is not included in the production incentive and overtime meal allowance calculation to compensate workers. C.6, ER.22
- 2. Unused annual leave is compensated at the basic salary level, not the average of the workers' yearly income. ER.22, HOW.14
- 3. The factory has allowed workers who have babies below one year old to leave for breast feeding an one hour a day, however new workers in the two month probation period who have babies cannot take leave for breast feeding. The factory does not have and does not maintain a list of new mother who have recently joined the factory. ND.8

# Local Law or Code Requirement

Cambodia Labor Law, Article 166,168, and 169, Cambodia Labour Law, Article 184, FLA Workplace Code (Employment Relationship Benchmark ER.22; Compensation Benchmarks C.6; Hours of Work Benchmark HOW.14; Nondiscrimination Benchmark ND.8)

#### Recommendations for Immediate Action

- 1. Include maternity leave compensation in the production incentive and overtime meal allowance.
- 2. Compensate unused annual based on the workers' average incomes.
- 3. Maintain a list of new mothers including workers who are in probation period, and allow them to leave for breast feeding one hour a day as per the legal requirements.

### COMPANY ACTION PLANS

# Action Plan no 1.

### Description

- 1. Based on document review and management interview, this finding is still pending as the factory is waiting for an update from Ministry of Labor for this law requirement.
- 2. Based on document review and management interview, this finding is still pending as the factory is waiting for an update from Ministry of Labor for this law requirement.
- 3. There are no similar cases within 1 year until the follow up date. However, the factory has a clear policy indicated that all workers (including new workers) who have babies below one year old to leave for breast feeding an one hour a day. The factory also maintain a list of new mother who have recently joined the factory.

### Planned completion date

08/17/18

### **FINDING NO.8**

### SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Hours of Work

### Finding Explanation

1. The working hours records does not identify pregnant and lactating women in the system. HOW.5

2. Although workers do not work more than the legally-allowable number of overtime hours, factory management has set production targets, and an incentive production system at a level such that workers need to work beyond regular working hours; thus, the factory's production planning regularly includes overtime hours. ER.24

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.24; Hours of Work Benchmark HOW.5)

#### COMPANY ACTION PLANS

### Action Plan no 1.

#### **Description**

- 1. The factory does not identify the prenant worker in the system, they are planning to improve.
- 2. At that time according to our peak season the factory cannot set up the production planing without OT working as well so they need to settle the goods for customer. They are planning to improve.

# Planned completion date

08/17/18

#### FINDING NO.9

#### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Workplace Conduct & Discipline

#### Finding Explanation

Disciplinary actions are not witnessed by a third-party during imposition. ER.27

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.27)

### COMPANY ACTION PLANS

# Action Plan no 1.

#### Description

The factory still keep it because we not yet got any idea or comment from an auditor before. They are planning to improve on this part

#### Planned completion date

08/17/18

# FINDING NO.10

#### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Grievance System

#### Finding Explanation

- 1. The factory has provided suggestion boxes at the each production hall; however, no signs or instructions, such as updated grievance policy and procedure, has been posted to instruct the workers. Additionally these suggestion boxes are not confidential, as they are posted at the front entry gate. ER.25
- 2. The workers are not aware of all the grievance channels at the factory, such as the suggestion box, and only submits grievances through the worker representatives. ER.25

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25)

### COMPANY ACTION PLANS

#### Action Plan no 1.

### **Description**

- 1. Suggestion boxes are relocated to toilet area for the confidentiality. The factory updated grievance policy on May 22, 2018 and posted it with instruction next to suggestion boxes.
- 2. The factory already announced and post all grievance policy and procedure to all worker but they still not using the grievance system and directly with supervisor and worker representatives. Approximately 30% of workers are not trained about grievance channel. Based on worker interview, they are not aware of grievance channels in the factory.

### Planned completion date

08/17/18

### **FINDING NO.11**

### SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Industrial Relations

### **Finding Explanation**

Employees are not provided a copy of the Collective Bargaining Agreement (CBA), and it also did not post on prominent information bulletin boards in each working department. ER.16

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.16)

### **COMPANY ACTION PLANS**

# Action Plan no 1.

### **Description**

The factory posted CBA in the bulletin board. However, the factory only provided CBA to Trade Union and worker representatives instead of each worker as required. In addition, this CBA was expired since Nov 2, 2017.

#### Planned completion date

08/17/18

#### FINDING NO.12

### SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Environmental Protection

### Finding Explanation

It was noted the factory has a waste management system in place, waste was segregate by type and located separately from domestic, hazardous waste and chemical waste. All waste was handled by an approved service collector. Waste water was discharged to a separate pits and periodically collected by the waste service collector, while raining water was discharged into the public drainage system. However the factory did not have yet in place a program which could help identify the negative impact in environmental protection. ER.31

# Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.31)

#### COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

The Factory have not improved yet, but they practiced and separated all waste management system as well, but not completed with water was permite.

Planned completion date

08/17/18

## FINDING NO.13

## IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

# **Finding Explanation**

- 1. Seven sewing machines located in factory 3 and 4 were missing the guard for the pulley belt. HSE.14
- 2. It was noted from the factory tour at least three buttoning machines located in the factory 1 were missing of guarding. HSE.14
- 3. At least three blown ray machines located in the factory were missing guards to prevent hand burn injury to the workers. HSE.14
- 4. The fixed ladder used to climb up to the top of the water tank platform, which was measured around 4 meters high, was missing the safety caging to protect the people from falling down when they go up to this platform to do maintenance. HSE.14
- 5. The movable ladder located in the materials warehouse was missing the break mechanism to prevent the ladder from moving when workers are on this ladder. HSE.14
- 6. One maintenance worker was doing the maintenance work on sewing machines, he had posted the notification on the machine stating that the machine was under service, but he did not unplug the electrical wire from the electrical source. HSE.14

#### Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmark HSE.14)

#### Recommendations for Immediate Action

- 1. Install safety guard for all pulley belt of sewing machine, guarding for buttoning machine and blow ray tools.
- 2. The factory must check all the buttoning machines to ensure guarding is equipped for any buttoning machine which is missing a safety guard. Supervisor in charge of each workshop must perform a daily walkthrough through-out the production floor under his/her scope of responsibility to ensure all working condition must be safely maintained.
- 3. The factory to provide guards for the blowing machines that were missing safety guards. Safety team coordinate with the supervisor of each workshop to conduct an effective risk assessment through-out the production floor to ensure all risk of accident caused the working tools or equipment should be in good condition and safe for use.
- 4. The factory should install the protection cage for the fix ladder to protect maintenance from falling down when climbing up onto this fixed ladder. The cage should be installed 1.8m from the ground level.
- 5. The factory is recommended to install the break mechanism for the movable ladder. The factory promote the safety reporting program to encourage/motivate the workers to raise their concern about safety through an early reporting program, near miss reporting program.
- 6. The factory to establish the safety procedure for maintenance workers, to ensure they disconnect the source of power when doing the maintenance on machinery. Set a safety performance KPI for each supervisor to ensure they are responsible for the safety of their respective workshop.

# **COMPANY ACTION PLANS**

### Action Plan no 1.

### **Description**

- 1. Pulley guard was installed for all sewing machines in the whole facility as required.
- 2. Safety guard was installed for all buttoning machines in the whole facility.
- 3. From the factory tour, guard was not installed for blown ray machines to prevent hand burn injury to the workers.
- 4. The factory only installed hand-railing for ladder instead of safety caging as required.
- 5. Movable ladder located in the finished goods warehouse was missing the break mechanism to prevent the ladder from moving when workers are on this ladder. In addition, the platform of this ladder was damaged.
- 6. No maintenance work was observed. Based on management interview, maintenance workers are trained about it. However, the factory did not obtain the training records.

# FINDING NO.14

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

### **Finding Explanation**

- 1. At least five gas cylinders for cooking located in the dormitory kitchen were put in the kitchen, while they should be put outside and away from the cooking oven. This raises the risk of fire. HSE.5
- 2. The eye wash facility located near the chemical storage was wrongly installed; the water injection nose was pointed down instead of up to enable water injection to wash the eyes properly, additionally the eye wash facility was not clean. HSE.6
- 3. The factory has in place a tag out procedure when doing the maintenance work, however this Lockout-Tagout (LOTO) was not fully complied with the LOTO process. This process should include the pre-LOTO process (such as permit for LOTO), notification of affected personnel, turn off the equipment that needs to be prepared, cut off source of energy, discharge stored energy, try again before performing the maintenance, do the maintenance work, check all tool and guard should be in place before re-operating the equipment, notify the people around before resume the operation. HSE 14

#### Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.5, HSE.6, HSE.14)

#### Recommendations for Immediate Action

- 1. Change the eyes wash pipe by an appropriate pipe designed for eyes wash equipment.
- 2. Develop the Lockout-tagout (LOTO) procedure and provide training for the maintenance and operator on this program and identify the type of energy and machinery which need to be lock and tag before the maintenance or cleaning work could be started. Define type of LOTO to provide a proper LOTO devices for the maintenance workers. Reinforce the implementation of this LOTO procedure applicable for the maintenance team and to ensure they must strictly follow this LOTO SOP. Ensure that all equipment/machinery when purchase, must be able to lock and tag for maintenance purpose. Period test the knowledge of the maintenance worker to ensure they are fully understood this LOTO process.

### COMPANY ACTION PLANS

# Action Plan no 1.

### Description

- 1. Only one gas cylinder was located in the kitchen and it is fixed for safety purpose as required.
- 2. Water pressure of one eye wash equipment located near chemical storage area was very low when tested.
- 3. LOTO procedure was revised. This procedure includes the pre-LOTO process (such as permit for LOTO), notification of affected personnel, turn off the equipment that needs to be prepared, cut off source of energy, discharge stored energy, try again before performing the maintenance, do the maintenance work, check all tool and guard should be in place before re-operating the equipment, notify the people around before resume the operation. However, no locking device was provided for review.

<u>Planned completion date</u> 08/17/18

# FINDING NO.15

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

#### Finding Explanation

- 1. Some of the glue used by the workers in the gluing section is put in drinking water bottles and only the name of the chemical is posted on the bottle, additionally the bottle was missing safety labels such as safety pictogram and basic safety instructions (following the Global Harmonized System guideline for chemical labelling); to instruct workers on the chemicals they are using. HSE.9
- 2. MSDS posted in the production workshop and in the chemical storage was obstructed by boxes of materials or chemical drum, so could

not be easily accessed in case of emergency. HSE.10

#### Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.9 and HSE.10)

### Recommendations for Immediate Action

- 1. The factory to remove all drinking water bottles which are used to hold glue, instead, the factory should provide bottles which are different from the drinking water bottles and follow the GHS labelling instruction to label the glue bottle. This label should have the safety pictogram, name of chemical, and the basic safety caution.
- 2. Reallocate the MSDS documents to the area where worker can access easily at any time.

#### COMPANY ACTION PLANS

# Action Plan no 1.

#### **Description**

- 1. All glues are stored in a designated bottle (not drinking water bottle) with safety label and instruction.
- 2. MSDS posted in the production workshop and in the chemical storage was not obstructed. It is visible and accessible for worker.

### Planned completion date

08/17/18

### FINDING NO.16

#### IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

#### Finding Explanation

- 1. The factory does not have an ergonomic program in place. No adjustable workstation was provided for the workers such as adjustable chair or back rest chair. HSE.17
- 2. There is no visual management system in place such as indicators, convex mirrors in dead end or reflectors device was installed in the strategic location to ensure safe driving practices on the factory premise. HSE.1
- 3. The factory is still using the safety body belt to perform work at heights, however this safety body belt was banned by OHSAS since 1998. Body belts are not acceptable as part of a personal fall arrest system. Body belt in a positioning device system is acceptable and is regulated under paragraph (e) of 29 CFR 1926.502). By OHSAS, an employee who uses a body belt as a personal fall arrest system is exposed to hazards such as falling out of the belt, serious internal injuries, and technical asphyxiation through prolonged suspension. HSE .14

### <u>Local Law or Code Requirement</u>

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.14, and HSE.17)

#### Recommendations for Immediate Action

The maintenance workers were provided with a body belt to work at height which has been banned by OHSAS (refer to paragraph (e)) of 29 CFR 1926.502). The factory to provide appropriate fall protection for the concerned workers when work at height, such as full body harness instead of body belt.

#### COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

- 1. The factory does not improve yet, but they planned.
- 2. Convex mirror is only installed in the finished goods warehouse. It is not installed in dead end in the strategic location to ensure safe driving practices on the factory premise.
- 3. The factory already have safety body belt and provide to worker but your belt not completely to protection dangerous during working in high place.

### Planned completion date