



COMPANIES: adidas
Outerstuff LLC

COUNTRY: Bangladesh

ASSESSMENT DATE: 09/25/18

ASSESSOR: Insync Global

PRODUCTS: Apparel

NUMBER OF WORKERS: 1882

FLA Comments

In September 2018 the FLA conducted an SCI assessment at this factory. At the time of the audit, adidas did not hold a direct commercial relationship with this factory, as all adidas production made at this facility was sourced by adidas' licensee, Outerstuff. Shortly after the assessment took place and before the report was completed, Outerstuff ceased sourcing adidas product from this factory as all orders for this specific adidas licensed product category had come to an end. However, Outerstuff has continued working with this factory through other product categories/brands, and will work with the Factory in the creation and implementation of a corrective action plan. No factory closure and/or worker retrenchment resulted from the conclusion of the adidas' licensed program at this factory.

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: Review Process (Macro)

Finding Explanation

1. A clause of the review period in the factory's written Policies & Procedures states they will be reviewed when required; the review period is undefined. The date on all available Policies & Procedures is January 1, 2018. [ER.1, ER.29.1, ER.30.2, ER.31.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER 29.1.1, ER 30.2 and ER 31.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

15.1 . In every two years we are reviewed our policies & procedures. But in emergency case it should be change.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. Specific training on Recruitment, Hiring and Personnel Development, Compensation, Hours of work, Termination and Retrenchment, Industrial Relations, and Workplace Conduct & Discipline is not conducted for supervisors or workers. [ER.15, ER.17]

2. The factory has no training calendar or a plan to ensure training on employment functions is conducted for 100% of employees in every 12 month period. [ER.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.15 & ER.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

14.1 Now we trained our workers or supervisors about recruitment, hiring and Personnel Development, Compensation, Hours of work, Termination and Retrenchment, Industrial Relations, and Workplace Conduct & Discipline by some special training. This is our continuous process.

Action Plan no 2.

Description

14.2 Earlier we didn't have any training calendar. we conduct our training program as per our factory instruction. But after audit we maintain a training calendar for every 12 month.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory has no written Policies & Procedures on Hiring & Personnel Development, aside from Promotion. [ER.1, ER.28, ER.29, ER.30]
2. The written policy on recruitment refers to laws, but does not provide information regarding recruitment, temporary closure, layoffs, termination, punishment, disciplinary action, or medical insurance. [ER.1]
3. The written procedures on recruitment state "other" documents should be provided by workers, but do not specify or list the "other" documents. [ER.1]
4. The factory does not have defined written procedures on recruitment. [ER.1]
5. The recruitment procedures do not include the requirement to maintain employment documents of workers. [ER.1]
6. Evaluation letters and letters communicating increments are filed separately and not kept in workers' employment records. [ER.2]
7. Appointment letters issued to workers hired prior to 2012 do not include information about overtime compensation. This information is included in letters issued after 2016. Management provides this information during the orientation program. [ER.2]
8. The factory places sewing machine operators in Grades 5, 6, and 7, not Grades 3 and 4, as legally allowed. Grade 7 is the lowest wage and Grade 3 is the highest. Management stated no worker was eligible for Grades 3 or 4. The factory promoted five workers from sewing machine operators (Grades 5 and 6) to supervisors. Management could not justify the reasons for these promotions to supervisors. [ER.2]
9. The factory has not defined or communicated information on promotion criteria to workers. In 2017, the factory promoted 39 workers to higher grades. Of these workers, two junior sewing machine operators (Grade 5) and three general sewing machine operators (Grade 6) were promoted to supervisors, while the remaining workers were promoted from Assistant Machine Operators to General Machine Operators. Management stated that these workers were promoted based on internal skill evaluations. A sample of six of these workers showed a worker with more experience and higher scores was not promoted to Supervisor and another worker had no evaluation results, but had been promoted. [ER.2, ER.29.1.1, ER.30.2]
10. An appointment letter signed with workers states unauthorized absenteeism for more than ten days would result in action being taken, per section 27 (3A) of law, and workers can resign, per section 27 of law. Workers may not be aware of the legal references provided. [ER.2]
11. In August 2018, six of 16 new workers did not attend the orientation program. There is no system to ensure 100% of new workers attend the orientation program. Information about working hours, Personnel Protective Equipment, and fire safety is discussed during orientation, while other code elements are not discussed. [ER.15.1]
12. The orientation program does not include information on the following employment functions: Environmental Protection, Recruitment, Hiring and Personnel Development, Industrial Relations, or Retrenchment. [ER.15.1]

13. Information on termination is included in the employee handbook, but not in the written document provided during the orientation program. [ER.15.3]

14. Job descriptions do not define responsibility for Recruitment, Hiring or Personnel development and notes that documentation will be maintained. [ER.1]

15. The factory did not provide job descriptions for working hours, Termination & Retrenchment, Freedom of Association, Industrial Relations, or Workplace Conduct and Discipline. Job descriptions for other employment functions state the name of the person in the role, but does not list their responsibilities. [ER.1]

16. The agreement with a subcontractor includes no mention of the FLA Code, including payment of wages, working hours, overtime requirement, recruitment practices, or Health & Safety. [ER.2]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) Chapter II Conditions of Employment, Section 27 (3A); FLA Workplace Code Employment Relationship Benchmarks (ER.1, ER.2, ER.15.1, ER.15.3, ER.28, ER.29 & ER.30)

COMPANY ACTION PLANS

Action Plan no 1.

Description

13.1 As per your instruction, we develop a written policies & procedures for hiring & personal development. And we also follow the Bangladesh labor law Act 2006.

Action Plan no 2.

Description

13.2 We already provide all information in our recruitment policy as per your instruction.

Action Plan no 3.

Description

13.3 We have an standard written procedures on recruitment. As per your finding "other" document it means if they have an other experience certificate or if any document which is helpful for our recruitment. But as per your instruction , Now we does not maintain other document option. We specify the all items which will be required for recruitment.

Action Plan no 4.

Description

13.4 we defined the written procedures on recruitment.

Action Plan no 5.

Description

13.5 After audit, the factory already work for written policies & procedure and maintain proper and accurate records governing all aspects of employment from recruitment.

Action Plan no 6.

Description

13.6 As per your instruction, now we are maintain separate filed and also record the worker's employment.

Action Plan no 7.

Description

13.7 Before 2016 we didn't include this information but after 2016 we include this information in appointment letter.

Action Plan no 8.

Description

13.8 Our promotion not only based on grade, we also follow the work efficiency . If any operator able to work as supervisor whatever his grade then we will promote the operator as a supervisor. Like; if any operator grade 3 but his length of service 5 years; his working efficiency not so good. and another operator grade 6 or 7; length of service 2 years; but his working activities better then earlier one. Then the promotion will be given who taken grade 6 or 7.

Action Plan no 9.

Description

13.9 As per your findings, we should promoted those operator who are more experience and highly skilled and we also follow this instruction. But this time our operator not agree to get promotion as supervisor. Because of his work activities will be increase. So we need to promoted who is the next.

Action Plan no 10.

Description

13.10 We already aware about legal references all of our workers by some special training. Now they have an better knowledge about legal Ref.
We already include law description in our appointment letter in case of law reference and also awareness this subject to our all employees by P.A system now they have a better knowledge about the legal rights.

Action Plan no 11.

Description

13.11 This is our Mistake, but now we provide training of our workers in daily basis.

Action Plan no 12.

Description

13.12 We arrange orientation program for new employee. Lots of topic we have discuss but as per your instruction we include the following employment functions: Environmental Protection, Recruitment, Hiring and Personnel Development, Industrial Relations, or Retrenchment.

Action Plan no 13.

Description

13.13 We have discuss about termination in our orientation program. But we didn't provided any written document. AS per your instruction now we provided written document during orientation program.

Action Plan no 14.

Description

13.14 As per your requirement, we defined all information in job description and also we maintain proper documentation.

Action Plan no 15.

Description

13.15 We already provide job description for our employee and also include all information which need to include in job description as per your instruction. And we specifically mansion the job responsibilities in job description.

Action Plan no 16.

Description

13.16 As per your requirement, we already include FLA Code, payment of wages, working hours, overtime requirement, recruitment

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The current probation period is three months long, but local law allows for the period to be six months. Although there have not been any instances of the probation period being extended, this is still a risk. [C.3]
2. The factory does not issue a letter confirming status of employment following completion of the probation period, although it is included in the written procedures on recruitment in clause two. [ER.2]

Local Law or Code Requirement

FLA Workplace Code Employment Relation Benchmarks ER.2 and C.3.

Recommendations for Immediate Action

1. Restrict the probation period to three months.
2. Issue letters to workers confirming status of employment following the completion of the probation period, as stated in Clause 2 of the written recruitment procedures.

COMPANY ACTION PLANS

Action Plan no 1.

Description

12.1 As per Bangladesh Labor Act- 2006 (Amendment- 2018) Clause-4 (Section-8), The period of probation for a worker shall be three month; Provided that in the case of a skilled worker, the period of probation may be extended by an additional period of three months if, for any circumstances, it has not been possible to determine the quality of his work within the first three months' period of his probation.

Please note: If we implement FLA COC Clause [C-3] it is not matching with BLA-2006 and it is also contradictory with our others buyers COC.

Action Plan no 2.

Description

12.2 Now we already provided confirming letter all of employee & worker after successfully complete the probation period.

FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The Policy & Procedures on compensation do not include any information on advances or loans. [ER.1]
2. Workers have limited awareness of how the factory calculates overtime compensation, maternity benefits, service benefits, and gratuity. [ER.15, ER.16]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, and ER.16)

COMPANY ACTION PLANS

Action Plan no 1.

Description

11.1 We already have include the information on advances or loans in policy & procedures on compensation.

Action Plan no 2.

Description

11.2 We already arrange training program about compensation, maternity benefits, service benefits and gratuity. Now our worker has enough idea about those thing. expected 4/30/19

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. Time cards show that employees work overtime on a regular basis. [HOW.1.2, HOW.8.4]

Local Law or Code Requirement

FLA Workplace Code (Hours of Work Benchmarks HOW.1.2 and HOW.8.4)

Recommendations for Immediate Action

1. Overtime work should only be used in exceptional circumstances. The factory should conduct regular analysis of hours of work to progressively reduce excessive working hours.

COMPANY ACTION PLANS

Action Plan no 1.

Description

10.1 Now we didn't conduct overtime regularly. Except exceptional circumstances we conduct overtime by employee permission. UGL During audit FLA assessor said time card shows, worker are doing overtime every day. We said we have got written confirmation to do overtime and they are doing it willingly. We said some time we need to meet shipment and some time production people can not meet target production so, we need to do overtime work.

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

1. The factory does not record the date of payment on pay sheets for terminal dues, so the timing of the payment cannot be verified. The date recorded on the calculation sheet reflects a date recorded in advance, so it may not necessarily be the date when payment was actually made. [ER.2]

2. The time cards and leave records are not maintained with calculation and pay records for terminal dues, so the accuracy of calculations cannot be verified. [ER.19, ER 32.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.19, ER.32.2)

Recommendations for Immediate Action

1. Record date of payment on pay record for terminal dues.
2. Maintain time and leave records with pay records of terminal dues.

COMPANY ACTION PLANS

Action Plan no 1.

Description

9.1 Now we maintain payment pay sheet & calculation sheet record with proper date.

Action Plan no 2.

Description

9.2 we maintained time & leave records with pay records of terminal dues.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. The factory's written procedures do not define the type of action to be taken for a misconduct or the record-keeping requirements for disciplinary actions. [ER.27]
2. The factory has taken written disciplinary action against two workers. In one instance in September 2018, a worker was given a show cause notice without any warnings after being absent for 16 days over nine months. Another worker, absent for five days in 2017 and six days in 2018, was issued a warning letter prior to the show cause notice. The factory had not issued warning letters prior to issuing the show cause notice. [ER.1, ER.27]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) CHAPTER II CONDITIONS OF EMPLOYMENT AND SERVICE, Section 26; FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

8.1 After audit, we kept our all disciplinary action related activities as per law.

Action Plan no 2.

Description

8.2 This is our mistake, as per our disciplinary policy & procedure, when any worker make an unauthorized absent, then we give him/her verbal warning. If they make again another unauthorized absent, then we take action against them with the Ref. of law.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. Although the factory has a written grievance policy, this policy does not include any information on non-retaliation. [ER.25]
2. The factory has no training on grievance handling procedures for Supervisors. In the past 12 months, the factory has trained 79 of 1503 workers on the grievance mechanisms. [ER.1, ER.15, ER.17]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, and ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

7.1 we already include such kind of information in our grievance policy.

Action Plan no 2.

Description

7.1 As per requirement, we already include such kind of information in our grievance policy.

Action Plan no 3.

Description

7.2 Now we provided special training for all of our employee about grievance mechanisms.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The written policy regarding environmental protection at the factory only pertains to the internal workplace environment. It does not include external environmental protection. [HSE.1]
2. There are no written procedures to manage the factory's internal or external environmental impact. [HSE.1, ER.31]
3. The factory has no Emergency Response Team for gas emergencies. [HSE.1]
4. The factory does not specially train supervisors. The factory has provided waste management training to 357 of 1757 employees. [ER.15, ER.17, ER.31]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, ER.31; Health, Safety, and Environment Benchmark HSE.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

6.1 We already have existing environmental policy. But we are change our environmental policy as per your instruction.

Action Plan no 2.

Description

6.2 We already create an environmental policy to know about internal or external environmental impact.

UGL During audit FLA assessor advice to make a written procedure to manage internal and external environmental impact. And he give some example how to make this policy/procedures and what kinds of information need to write in policy. As per advice from him and compare with environmental test report we have made a policy.

Action Plan no 3.

Description

6.3 As advised earlier, we already work on this issue. We create a team those who are work for emergency response.

UGL During audit FLA assessor advice to make a team for managing if arise any emergencies at gas area or boiler area. And he give some example how to make this policy/procedures and who are included the team. As per advice from him and considering factory commitment we have made a policy.

Action Plan no 4.

Description

6.4 we provided special training for supervisors. Earlier time we provide waste management training only cleaner but now we trained all of our employee.

UGL During audit FLA assessor advice to train up supervisor and worker for waste management. And he give some example how to train and what kind of information they need to train up. As per advice from him and considering factory commitment we have provide a training program on January 6th, 2019

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The contents of the written policy are as defined by law and not specific to the factory. [HSE.1, ER.31]

2. There factory does not have procedures for the following:

- Standard Operating Procedures for performing jobs safely, measures to protect the reproductive health of workers, or measures to protect workers who raise concerns.
- There are no written procedures for fire safety, like steps to ensure aisles and evacuation routes are cleared, or how to evacuate visitors and special category of workers.
- There are no written procedures for chemical management, including storage, usage, and an emergency response plan.
- The factory has not conducted a fire risk assessment.
- There are no written procedures for reporting injuries, what workers should do in case of injury, or contact information for responsible persons.
- There are no written procedures for contractor safety. [HSE.1, HSE.5, HSE.9, HSE.11, ER.31]

3. The factory has no competency certificate for the external elevator inspector. [HSE.1]

Local Law or Code Requirement

Bangladesh Factories Rules 1979 Section 46; (FLA Workplace Code Employment Relationship Benchmark ER.31; Health, Safety, & Environment Benchmarks HSE.1, HSE.5, HSE.9, and HSE.11)

COMPANY ACTION PLANS

Action Plan no 1.

Description

5.1 As per your instruction, we already change the policy & we implement in our factory.

Action Plan no 2.

Description

5.2 We follow health & safety issues as per our factory guideline.

New guidelines will be provided in 3 months. Expected 5/22/19.

UGL During audit FLA assessor advice to make a policy/procedures for OSH and fire safety. And he give some example how to make this policy/procedures and what kinds of information need to write in policy. We are working on it and will finish as soon as possible.

Action Plan no 3.

Description

5.3 We will complete this issue within 03 month. expected 5/30/19.

Bangladesh govt. has no rules to issue such kind of certificates so we negotiate with the engineer of Dhaka University of Engineering & Technology (DUET) to collect the certificate. For this reason we need three month to complete the issue.

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has no emergency lights installed above the exits in the embroidery section. [HSE.5]

Local Law or Code Requirement

Bangladesh Factories Rules 1979 Section 51; FLA Workplace Code (Health, Safety, and Environment Benchmark HSE.5)

Recommendations for Immediate Action

1. Install emergency lights above exits in the embroidery section.

COMPANY ACTION PLANS

Action Plan no 1.

Description

4.1 our electric department already provide emergency exits light in embroidery section.

Planned completion date

12/15/18

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. In the past 12 months, the factory has trained only 184 workers out of 1503 workers on PPE. [HSE.8]

2. Workers operating the heat seal machine were using soft latex gloves. The workers are not provided with the appropriate gloves. [HSE.8]

3. Maintenance workers were not using safety shoes while at work. The workers are not provided with the appropriate shoes. [HSE.8]

Local Law or Code Requirement

Bangladesh Factories Rules 1979, Section 40; FLA Workplace Code (Health, Safety, and Environment Benchmark HSE.8)

Recommendations for Immediate Action

1. Conduct PPE training for all workers.
2. Provide appropriate gloves to heat seal machine operators.
3. Monitor and ensure maintenance workers use safety shoes.

COMPANY ACTION PLANS

Action Plan no 1.

Description

3.1 we provided PPE training program for all of our new employees in the time of Orientation training and also maintained all documentation which we had submitted on the time of audit.

Action Plan no 2.

Description

3.2 Now our worker use normal gloves. As per your instruction we already take action. And our procurement is in progress. expected completion 3/31/19

Action Plan no 3.

Description

3.3 Our factory have already provided safety shoes for our maintenance workers. Admin, Compliance and Maintenance Manager will ensure the issue properly on regular basis.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not train workers with special responsibilities, like air compressor operators. An untrained electrician operates the air compressor, a pressure vessel. [HSE 14.2]
2. The factory shared photographs from training conducted in the past two years for electricians, showing them working high above ground on electric panel boards and machines without personal protective equipment (PPE), including safety gloves, safety shoes, safety belts, or helmets. [HSE.14.2]
3. The factory does not specifically train workers responsible for the evacuation of fellow workers. [HSE.5.2]
4. Underground water tanks are not marked. [HSE.1]
5. The arms locks on two ladders are damaged, tied with a chord to prevent them from moving away from each other. The anti-skid stoppers on one ladder are missing. [HSE 14.1]
6. There are no eye wash stations installed near oil storage areas. [HSE.1]
7. The first aid kits have no gloves or antiseptic solution. [HSE.6.1]
8. The kitchen used to cook lunch for staff was dirty and maintenance standards are poor. Three staff and other outsourced catering workers in the canteen do not use nose masks, hair caps, or gloves, and handle raw food with their bare hands. [HSE.22.1]
9. Only two of four food handlers had Health Check certificates. [HSE.22.2]
10. The bathrooms provide hand towels for workers to wipe hands dry, not a more hygienic hand-drying facility, such as an electric hand dryer or disposable paper. [HSE.19]

11. The factory has one child care attendant who has a Health Check certificate, but the attendant is not trained in child care. In her absence, another worker, who does not have a Health Check certificate, is assigned responsibility for the children. [HSE.1]
12. The factory has no posted safety instructions near machinery. [HSE 14.3]
13. Needle guards are pushed upwards, rendering them ineffective in preventing injury to fingers of sewing machine operators. [HSE.14.1]
14. The factory has not marked traffic lanes, nor do they provide driving aids like convex mirrors, reflectors, or speed bumps. [HSE.1]
15. The factory has no spill response kits in oil storage areas. There are oil leak stains from the storage tank in the power generator room. [HSE.11]

Local Law or Code Requirement

Bangladesh Factories Rules 1979 Section 40 (for all findings as this relates to safe operations of machinery and reducing bodily injury), Section 57(8) (for Finding #9) and Bangladesh Labour Act 2006 (updated in 2015) Chapter VIII - Section 94(2)) for Finding #12); FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.5.2, HSE.6.1, HSE.11, HSE.14.2, HSE.14.3, HSE.19, HSE.22.1, and HSE.22.2)

Recommendations for Immediate Action

1. Train workers with special responsibilities, like air compressor operators and ensure only qualified persons operate air compressors.
2. Ensure employees use adequate fall protection during training programs and training photographs.
3. Specially train workers responsible for evacuating fellow workers.
4. Mark confined spaces, including underground water tanks, to warn workers.
5. Replace damaged arm locks and install anti-skid stoppers on ladders.
6. Install eye wash station near oil storage areas.
7. Provide gloves and antiseptic solution in first aid kits.
8. Maintain cleanliness of staff canteen at all times. Provide nose masks, hair nets, and gloves for food handlers, and ensure use.
9. Conduct Health Check for all food handlers.
10. Provide hygienic hand drying facilities in bathrooms, such as electric hand dryers or disposable paper towels.
11. Conduct training and health checks for all childcare attendants.
12. Post safety instructions near machinery.
13. Install appropriate needle guards on sewing machines.
14. Mark traffic lanes inside the factory and provide driving aids like convex mirrors, reflectors, and speed bumps.
15. Provide spill response kits in oil storage areas.

COMPANY ACTION PLANS

Action Plan no 1.

Description

2.1 We have conducted a special training for our air compressor operators and our plant Engr. will ensure qualified operators to operate air compressor (pressure vessel)

Planned completion date

12/19/18

Action Plan no 2.

Description

2.2 After audit, our plant Engineer ensure that he properly used all adequate personal protective equipment in his all training

season. And we keep all training photographs.

Planned completion date

12/19/18

Action Plan no 3.

Description

2.3 We have already conducted a specific training of our workers who are responsible for evacuating special category of workers. Our Welfare officer will follow up this issue on monthly basis.

Planned completion date

12/19/18

Action Plan no 4.

Description

2.4 As per your advice we have already marked our underground water tanks as confined spaces to warn workers.

Planned completion date

12/19/18

Action Plan no 5.

Description

2.5 After the assessment we have replaced the damaged arm locks and already have installed the anti-skid stoppers for our all ladders.

Planned completion date

12/19/18

Action Plan no 6.

Description

2.6 This issue is in progress. We will complete this issue within 3 month.

We are transferring power sub-station & oil storage section to out side of main factory building. It will take 3 months. So, we need 3 months to complete the issue.

Planned completion date

12/19/18

Action Plan no 7.

Description

2.7 we have provided hand gloves and antiseptic solution in our all first aid box.

Planned completion date

12/19/18

Action Plan no 8.

Description

2.8 we provided nose masks, hair caps and hand gloves to our staff food handlers and Welfare officer will monitor the issue properly on regular basis.

Due to new building construction for increasing production capacity , we permanently close the cooking facilities form our factory premises.

Planned completion date

12/19/18

Action Plan no 9.

Description

2.9 We already have completed Health Check for all of our food handlers (4 persons).

Planned completion date

12/19/18

Action Plan no 10.

Description

2.10 As per you instruction, we have provided hygienic hand drying facilities in our all toilets.

Planned completion date

12/19/18

Action Plan no 11.

Description

2.11 We already discuss our management about this issue. And they are ensure this issue will be solve within 01 month. We are trying to train up two child care attendant from PHULKI (NGO). They are doing this type of training at Dhaka. They need some time to arrange training. So, we need some time to solve this issue.

Planned completion date

12/19/18

Action Plan no 12.

Description

2.12 We will complete this issue within 2 month. expected 4/18/2019. We already provide safety instruction for every machine & we will provide digital machinery safety instruction with picture which will collect from sticker manufacturer. Procurement work is in progress complete within 2 months.

Planned completion date

12/19/18

Action Plan no 13.

Description

2.13 we have installed appropriate needle guards on our all swing machines.

Planned completion date

12/19/18

Action Plan no 14.

Description

2.14 we will complete this issue within 06 month. expected 8/18/2019

UGL During audit FLA assessor advice us to install a lance at main entry where the vehicle in/out from factory parking to road. So drive can see if any other vehicle run through the road, if no other vehicle run through the road then the driver can go out. But now one of our security guard doing this job manually and it is safer. Because Bangladeshi drivers are not trained about this.

Planned completion date

12/19/18

Action Plan no 15.

Description

2.15 We will complete this issue within 06 month. expected 8/18/19

As advised earlier by accredited assessor of Fair Labor Association (FLA) this issue been completed.

UGL we are transferring power sub-station & oil storage section to out side of main factory building. It will take 3 months. So, we need 3 months to complete the issue.

Planned completion date

12/19/18

FINDING NO.15

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. The factory does not have policies or procedures for the following employment functions: Workplace Conduct & Discipline; Industrial Relations; Termination & Retrenchment; Hours of Work; and Hiring and Personnel Development. [ER.1, ER.19, ER.25, ER.27, ER.28, ER.29, ER.30, ER.32]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.19, ER.25, ER.27, ER.28, ER.29, ER.30)

COMPANY ACTION PLANS

Action Plan no 1.

Description

n/a

Planned completion date

12/19/18

Company Action Plan Update

We already have policy for Workplace Conduct & Discipline; Industrial Relations; Termination & Retrenchment; Hours of Work; and Hiring and Personnel Development which we had submitted on the time of audit. But as per the visiting auditor there was some observation on the policies.

Now as per your requirement we already change our policies and procedure.