



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Hugo Boss AG
COUNTRY: Egypt
ASSESSMENT DATE: 12/13/17
ASSESSOR: FLA EMEA
PRODUCTS: Apparel
NUMBER OF WORKERS: 800

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 written policies on Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination & Retrenchment Industrial Relations, Workplace Conduct & Discipline, Grievance System and Health and Safety. The Environmental Protection policy does not contain a statement of the factory management's general support of energy and water efficiency, and a commitment to minimize impacts with respect to air emissions, waste, hazardous materials and other applicable environmental risks. ER.1, ER.23, ER.25, ER.27, ER.28, ER.29,ER.30, HSE.1
2. There is only one document that includes brief information on Compensation, Hours of Work, Workplace Conduct & Discipline, and the Grievance System. There are no procedures for Recruitment, Hiring & Personnel Development, Termination & Retrenchment, or Industrial Relations. Also there are some documents to manage the Health, Safety, and Environment issues. The existing Workplace Conduct & Disciplinary documents do not include the requirement to record all warnings, disciplinary actions, and filing requirements, and the procedure for workers to appeal the disciplinary action. ER.1,ER.29, ER.23 ER.32, HSE.1, ER.31, ER.32, ER.27
3. The existing Health and Safety documents do not contain steps for workers to raise health and safety concerns and protection against retaliation for workers who raise Health & Safety concerns. Additionally, there is no written information on what workers should do in case of injury and steps for reporting death, injury, illness, and other health and safety issues. ER.31
4. There are no procedures that enable workers to raise environmental concerns and including protections for workers who allege environmental violations. HSE.1, ER.31
5. The factory does not review its existing policies and procedures on Health and Safety on a periodic basis. ER.1, ER.31

Local Law or Code Requirement

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

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has developed written policies for Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination & Retrenchment Industrial Relations, Workplace Conduct & Discipline, Grievance System and Health and Safety. These and the environment policy has been presented in all work places.
2. The supplier developed written policy for Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination & Retrenchment Industrial Relations, Workplace Conduct & Discipline, Grievance System and Health and Safety. These and the environment policy are presented in all work places.

3. The supplier has issued Health and Safety documents contained steps for workers to raise health and safety concerns and protection against retaliation for workers.
The supplier has trained workers concerning Health and Safety as well the work accident as well how to report in case of injury and the steps for death reporting.
Furthermore a doctor and nurse are always available during work day.
4. The supplier has implemented a procedure that enable workers to raise environmental concerns which protect the worker who allege environmental violations.
5. The supplier has implemented a contract with consultant company in order to ensure the policies and procedures on Health and Safety are renewed on a periodic basis.

Action Plan no 2.

Description

1. The supplier has developed written policies for Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination & Retrenchment Industrial Relations, Workplace Conduct & Discipline, Grievance System and Health and Safety. These and the environment policy has been presented in all work places.
2. The supplier developed written policy for Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Termination & Retrenchment Industrial Relations, Workplace Conduct & Discipline, Grievance System and Health and Safety. These and the environment policy are presented in all work places.
3. The supplier has issued Health and Safety documents contained steps for workers to raise health and safety concerns and protection against retaliation for workers.
The supplier has trained workers concerning Health and Safety as well the work accident as well how to report in case of injury and the steps for death reporting.
Furthermore a doctor and nurse are always available during work day.
4. The supplier has implemented a procedure that enable workers to raise environmental concerns which protect the worker who allege environmental violations.
5. The supplier has implemented a contract with consultant company in order to ensure the policies and procedures on Health and Safety are renewed on a periodic basis.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The factory does not provide orientation training to the workers. ER.15
2. The factory only provides on-going training regarding fire safety.. ER.1, ER.15, ER.25
3. The factory does not provide training on Worker Protection, Workplace Safety, and Maintenance Safety. ER.1, ER.8
4. The factory does not provide specific training to supervisors on any of the Employment Functions. ER.1, ER.17, ER.27
5. Facility doesn't provide specialized training for H&S team. HSE.1

Local Law or Code Requirement

Local Labor Law No. 12, 2003, Article No 215, 217 Ministerial Decree No. 134/2003 on H&S Committees Article No. 18, FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.8, ER.15, ER.17, ER.25 and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has implemented a program for constant intensive orientation training to all workers they have.
2. The supplier has converted all training programs to the consulting company in order to provide professional services and certificates of proof.
3. The supplier has converted all training programs to the consulting company in order to provide professional services and certificates of proof. The supplier is also ISO 18001 & 14001 certified.
4. The supplier provide frequently training for supervisors along with workers so that they are aware concerning all company programs and policies beside the specific training which they had completed.
5. The suppliers health and safety team has attended a specialized training as well they obtained the evidences certificates.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

The worker integration component is missing across Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Termination & Retrenchment Health& Safety and Environmental Protection. Workers are neither systematically integrated nor consulted in decision-making processes. Additionally, the effort of the factory on communicating Health& Safety and Environmental programs to all workers is not sufficient. ER.1, ER.16, ER.25

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, and ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The supplier has updated the company policies rules concerning Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, workplace Conduct & Discipline, Grievance System, Termination & Retrenchment Health& Safety and Environmental Protection.

Further the supplier started intensive training for the workers which has been managed by consultant company.

The supplier has two mechanism of work to share workers in the decisions making processes.

First one during daily work. In each department one manager works along with workers and listens to them. Their opinions and suggestions are communicated to the management.

The second mechanism is directly with the management through a representative workers' meeting, which takes place monthly with the top management.

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The employment contracts for migrant workers are in English and Arabic, and not with workers' local languages. ER.5, ER.10
2. The facility reviews workers' daily productivity, however, there is not a performance review system to evaluate workers' overall performances. ER.29
3. The job application form includes questions about marital and military status. ER.3
4. Personnel files are not completed in accordance with local law. The initial medical check-up form, criminal record, and labour office notification were missing from all sampled files. ER.1

Local Law or Code Requirement

Egyptian labor law no. 12 of 2003 articles no. 77 and 216, FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.5, ER.10, and ER. 29)

Recommendations for Immediate Action

1. Provide migrant workers with their employment contracts in their local language.
2. Create detailed performance review system to evaluate the performance of the workforce at least once annually. Provide feedback to the workers on their performance reviews.
3. Remove all questions from the application form that could be used as a base for discrimination.

4. Ensure that personnel files include all legally required documents.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier provide all migrant workers a new contract in their local language.
2. The supplier has implemented a Productivity system.
3. The supplier has removed all questions about marital and military status from the job application form.
4. The supplier has combined the initial medical check up form to the personnel files.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. Working hours reported during worker interviews were not reflected in the formal attendance and payroll systems. This indicated that the factory did not provide the actual working hours records of the workers. Therefore the assessors were not able to verify the working hours and payments of the workers. C.5, C.6, C.15, C.16
2. Not all workers sign their off on their payroll sheet. Approximately 40% of workers is signing the payroll sheet. C.14
3. Migrant workers' payslips are not in their local language. C.17
4. Around 80% of the workers interviewed confirmed that monetary deductions are imposed as disciplinary actions for production mistakes and behavioural issues. Since the factory does not keep any records of disciplinary actions, this could not be confirmed via document review.C.11
5. The factory has a policy to grant workers loans to help them in emergencies, but these can exceed 3 months of salary. The loan amounts are disbursed according workers requests depending on their private needs. ER.20
6. The factory has a policy to deduct the attendance bonus if a worker uses their annual leave. HOW.12, HOW.13, HOW.17
7. Migrant workers don't have social insurance due to local Authority restriction on adding non-Egyptians in their coverage. While the factory provides medical support for migrant workers, they do not enroll them in private health insurance. ER.22

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.20, ER.22, Compensation Benchmarks C.5, C.6, C.11, C.14, C.15, C.16 and C.17; Hours of Work Benchmarks HOW.12, HOW.13, and HOW.17)

Recommendations for Immediate Action

1. Cease the practice of double bookkeeping and ensure that actual working hours are reflected in working hour records and payrolls.
2. Ensure that all workers confirm the receipt of their compensation.
3. Provide payslips to the migrant workers in their local language.
4. Cease the implementation of all forms of monetary deductions as disciplinary actions and communicate this change to workforce.
5. Update the loan policy so that loans do not exceed 3 months salary.
6. Provide workers who use annual or sick leave with the full attendance bonus.
7. Provide private insurance covering the same risks covered by social insurance system.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier is keen on keeping working hours report and payroll sheet signed from the workers for documents proof. This will be checked during the next Code of Conduct Audit.
2. The supplier is keen on keeping working hours report and payroll sheet signed from the workers for documents proof.
3. The supplier provide all migrant worker their payslips in their local language.
4. The supplier is keen on keeping working hours report and payroll sheet signed from the workers for documents proof as well as a bank statement reflecting all deduction from the workers' salaries.
5. The supplier has attached revised loans policy in notice board as well as enclosed it to the company policies. The supplier has not yet provided the document.

6. The supplier ensure that employees who take annual or sick leave receive the full attendance allowance and that we specify this rule in our company policies.
7. The supplier has implemented contract with insurance company to cover the migrant workers under social insurance.

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. Working hours reported during worker interviews were not reflected in the formal attendance and payroll systems. The factory did not provide the actual working hours records of the workers. Therefore the assessors were not able to verify the working hours and payments of the workers. ER.2, ER.23
2. According to workers interviews; workers have exceeded the limit of 60 hours per week in the last six months. Around 40% of workers interviewed have worked late night hours and occasionally worked double shifts. Yet, the official time records did not show any overtime beyond 60 hours in a week. HOW.1.3
3. According to workers interviews, workers could stay up to 13 working days without break; around 60% of interviewed workers have worked 13 continues days without rest in the month of December 2017. HOW.2

Local Law or Code Requirement

Local Labor Law No. 12 of 2003 Articles 82, 83, 85; FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER.23, Hours of Work Benchmarks HOW.1 and HOW.2)

Recommendations for Immediate Action

- 1.Keep records of actual working hours of the workers including all overtime worked.
- 2.Monitor working hours closely and ensure that working hours do not exceed 60 hours in a week.
- 3.Provide at least 24 hours break to all workers in every seven day period.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has implemented a new system that all workers should sign their attendance working hours report along with payroll sheet and afterwards will keep hard copy in separated files. That means they have soft copy from system as well hard copy for signature evidence.
 2. The supplier has implemented a new system that all workers should sign their attendance working hours report along with payroll sheet and afterwards will keep hard copy in separated files. That means they have soft copy from system as well hard copy for signature evidence.
- The supplier points out that they have increased their working capacity in the period from November last year to June last year. The capacity was increased from 800 workers to 11150 workers.
3. The supplier has implemented a new system that all workers should sign their attendance working hours report along with payroll sheet and afterwards will keep hard copy in separated files. That means they have soft copy from system as well hard copy for signature evidence.

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

There is a worker representative system in the factory with the worker representative election occurring in 2015. However, the representatives were not elected via a secret ballot system. Instead, a list is kept with the answers of the workers with yes or no for each candidate. Additionally, according to worker interviews, the representatives are not effective, and most of the workers do not know who they are. FOA.10, FOA.11, FOA.12, FOA.13, FOA.14

Local Law or Code Requirement

FLA Workplace Code (Freedom of Association Benchmark FOA.10, FOA.11, FOA.12, FOA.13, FOA.14)

COMPANY ACTION PLANS

Action Plan no 1.

Description

To ensure that all employees from all departments have the right to participate in employee representation, we have expanded the electoral base so that elections can be held from any department. This allows all employees to participate in the decision-making process.

The election is held at the same time, but individually in each section, and after a secret ballot, the person who collects the most votes from each section is declared. Then a meeting is held to introduce all the members from each section and the list of names of the representatives is published on the bulletin board.

The supplier has not yet provided the document.

This will be checked during the next Code of Conduct Audit.

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. The factory imposes monetary deductions to maintain discipline. This practice is included in the posted disciplinary action guidelines, and confirmed by worker interviews. However, factory management denied that they have implemented these procedures. H/A.2
2. The factory does not record disciplinary actions, therefore assessors could not review disciplinary records in personnel files. There was no evidence that workers have the right to participate and be heard in any disciplinary procedure against them ER.2, ER.27
3. Since the factory does not provide detailed orientation training and does not have written orientation training content, the workers are not provided a copy of workplace rules. ER.27
4. Disciplinary actions are not witnessed by a third party during imposition, and the factory does not have an appeal process. ER.27

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.15 and ER.27, Harassment and Abuse Benchmark H/A.2)

Recommendations for Immediate Action

1. Cease the implementation of monetary fines.
2. Keep the records of all disciplinary actions. Ensure that workers participate in this process and keep their signature on the records.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The Supplier has only established disciplinary measures for absence in its corporate policy on the basis of the Egyptian Legislative Decree No. 185 of 2003.

2. The Supplier has only established disciplinary measures for absence in its corporate policy on the basis of the Egyptian Legislative Decree No. 185 of 2003.

Further in case of complains the workers has all right to rush their complains to a legal department as there are qualified lawyer. As well they can discuss any complains at representative meetings with top management and finally they have right to escalate the topic to the labour office which is belong to local authority.

The supplier has several communication channels which workers can use to rush their complains.

The supplier has not yet provided the document.

This will be checked during the next Code of Conduct Audit.

3. Generally the new workers are receive a brief orientation training before they start to work. As well the material of orientation training is attached in announcement board in the workshop .

Further the supplier will ensure to have frequently training based on the new contract with consultant company.

4. In case in complains or any disciplinary action the workers has all right to rush their complains to the legal department as there

are qualified lawyer. As well they can discuss any complains at representative meetings with top management and finally they have right to escalate the topic to the labour office which is belong to local authority.

Finally the supplier has several communications channels which workers can use to rush their complains.

The supplier has not yet anchored this procedure in the policy.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

The factory does not maintain any documentation for the grievance processes. The workers generally prefer to use the open door policy, however, the factory does not record any of the grievances or suggestions conveyed. There was no grievance record that from the suggestion boxes. and the boxes are located at the main door instead of places that would ensure confidentiality, such as restrooms or locker rooms.ER.25

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The supplier has an open door policy. This is preferred by the employees and is also more successful for both sides. However, the supplier will also record the complaints.

Furthermore, the supplier has moved the complaint box to the restaurant.

The supplier has not yet provided pictures of the recorded suggestions and complaints made by employees.

This will be checked during the next Code of Conduct Audit.

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1.According to management statements during the factory tour, chemical waste is stored in an area close to the water treatment facility. This storage area is not closed and protected. The chemical waste containers are not labelled. HSE.9

2.The fabric, paper, and plastic wastes are kept in the storage area next to the cutting section. However, all these solid wastes are kept in same place instead segregated into waste streams. HSE.1

Local Law or Code Requirement

Egyptian Environment Law no. 4/1994 article no. 33, FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 and HSE.9)

Recommendations for Immediate Action

1.Relocate the chemical waste storage area away from the water treatment facility. Enclose the hazardous waste storage area. Label all chemical waste containers.

2.Segregate all solid wastes.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has allocated closed warehouse for chemical wastes.
2. The supplier has allocated a proper warehouse for fabric, paper, and plastic wastes.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The washing section workers who use chemicals were wearing different kind of protection masks for the same process, and one worker was wearing dust mask instead of filtered mask. Moreover, after the factory tour was finished, some workers were observed not wearing any personal protective equipment (PPE) at all while working. HSE.7, HSE.8, HSE.9, HSE.1
2. The grinder machines in the jean production section do not have the necessary eye shields. Additionally, the grinder machine in maintenance room also does not have eye shields. HSE.14
3. The workstations are not adjustable and the factory did not provide adjustable chairs for sitting workers. The factory does not provide anti-fatigue mats for the standing workers. Half of the standing workers are provided with rubber mats; however, these are not designed to reduce stress. HSE.17
4. The water treatment station is located on a high platform, which requires the responsible worker to climb stairs. The fences on this platform are too wide and are not sufficient to prevent falling. HSE.14
5. The fabric spreader machine does not have an emergency stop sensor. HSE.14
6. The elevator does not have the load capacity posted. HSE.14
7. Safety instructions are not posted near the relevant machinery. HSE.14
8. The forklift does not have a seat belt and warning light. Additionally, the traffic lanes and walking paths are not clearly marked. HSE.1

Local Law or Code Requirement

Egyptian Labor Law, No 12/2003, Book 5, Articles 209, 211 and 217, FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.9, HSE.14 and HSE.17)

Recommendations for Immediate Action

1. Provide proper PPE for washing section workers. Ensure that all workers wear their PPE while working.
2. Install proper guards on the grinder machines and train the workers on using of the guards.
3. Provide adjustable chairs for the sitting workers.
4. Ensure that all standing workers are provided anti-fatigue mats.
5. Provide proper fences for the water treatment area.
6. Install a stop sensor on the cutting machine.
7. Post the elevator load capacity.
8. Post safety instruction near the relevant machinery.
9. Provide a seat belt and warning light for the forklift. Clearly mark the traffic lanes.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has provided all workers with the proper PPE followed with their signature for receive proof. Further the supplier ensure to have frequent training from the consultant on a periodic basis in order to raise the safety concerns .
2. The supplier has adjusted all machinery with the proper safety protection tools like Eye protection guard and finger protection.
3. The supplier has changed all fixed chairs to adjustable chairs.
The supplier has not yet provide anti-fatigue mats for standing workers.
4. The supplier has adjusted the proper fences for the water treatment area.
5. The supplier has fixed the stopper sensor for the fabric spreader machine.
6. The supplier has posted the elevator load capacity.
7. The supplier has posted safety instruction near the relevant machinery.
8. The supplier has fixed to the forklift a seat belt and warning light as well has allocated and marked the traffic lanes and walking

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The cover of the electrical panel in maintenance room is left open, which has allowed dust to accumulate. HSE.13
2. The assessors were not able to review the factory electrician's certificate, since it was not kept in the factory. According to management the electrician keeps the certificate at his home. HSE.1
3. The factory does not have a lightning protection system. HSE.13
4. The factory does not implement a lockout-tagout program. HSE.14
5. There was not any that shows the factory has an electrical grounding system. HSE.13

Local Law or Code Requirement

Local labor law no. 12 of 2003 article no. 208, FLA Workplace Code (Health, Safety & Environment Benchmark HSE.1, HSE.13, and HSE.14)

Recommendations for Immediate Action

- 1.Keep the covers of the electrical panels closed.
- 2.Keep a copy of the electricians certificate in the factory.
- 3.Implement a lockout-tagout program for the machinery in the factory.
- 4.Ensure that the factory's electrical system is properly grounded.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has a trained safety team to keep all cabinets closed. In addition, the supplier has provided automatic fire extinguishing for all switchboards.
2. The supplier points out that the Auditor asked for the factory electrician's certificate on the last day of the exam at 5pm. At this time the person responsible was on weekend leave. As well the working day was finished by 3:30pm. The factory lances and certificates are always available at the location.
3. The supplier has installed the lightning protection system.
4. Despite the supplier does not use any dangerous machines in the production processes and all the machinery has internal safe protection the supplier implements a very smart system lockout / tagout.
Still the supplier needs more time to complete the system.
5. The supplier has an electrical grounding system.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory's fire alarm system was in the renewal process, and a new fire control panel was being installed. However, the new system was not operating during the assessment and the fire alarm was not working during the checks made by the assessors. After these checks the responsible personnel activated the old fire control panel, which revealed a low battery signal. While checking the alarm sound, it was not loud enough in the spray section, and there was no fire alarm sound in chemical storage area. HSE.5
2. Due to the renewal process the chemical storage room is not connect to the fire control panel. HSE.5
3. There are no emergency lights in the emergency stairs between the floors in building one. HSE.5
4. There are no emergency exit signs above two emergency exits, one is in the canteen and the other one is in the finishing department. HSE.5
5. The cutting section is located in another building, along with a canteen. The emergency exit door of canteen does not open in the

direction of evacuation, and there is no emergency exit sign above this exit. No fire extinguishers are located in this building. The factory management stated that this area still undergoing construction. HSE.6

6. The factory does not keep fire drill logs, and only keeps photos of the fire drills. Therefore there is no recorded date or any other details regarding to fire drills. HSE.5

7. The emergency evacuation route arrows on the floor were faded in the sewing section. HSE.5

8. During the factory tour, a worker was smoking in the canteen which is located inside the factory building. HSE.1

Local Law or Code Requirement

Egyptian Labor Law 12/2003, Book 5, Article 214; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5, and HSE.6)

Recommendations for Immediate Action

1. Ensure that the fire alarm system is centralized, and operating at all times. Check the sound level of the fire alarm throughout the factory and ensure that it can be heard sufficiently in all sections.

2. Provide emergency lights for the emergency evacuation paths between the floors.

3. Provide emergency exit signs above all emergency exit doors.

4. Ensure that canteen's emergency exit door opens in the direction of evacuation. Provide fire extinguishers in this area.

5. Keep the fire drill logs with the details of date, number of workers evacuated, duration of the drill and problems observed during evacuation.

6. Renew the floor markings in the sewing section.

7. Strictly prohibit smoking inside the factory and provide training to all workers on non-smoking.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has installed a new fire alarm system at all factory's sections and the sound level is well heard in all sections.

2. The supplier has connected the chemical warehouse to the fire alarm system.

3. All factory sections and building are provided with emergency lights

4. All factory sections and building are provided with the emergency exit signs.

5. The supplier has adjusted the canteen door to be opened outward in the direction of evacuation and marked the emergency exit sign. As well the supplier provided the place with sufficient fire extinguishers.

6. "The supplier has implemented a new system for documenting the fire-fighting plan.

Furthermore, the supplier has implemented a fire drill based on an integrated scenario to measure the evacuation time for all employees and the obstacles to implementation.

The study was recorded on video and photos were signed by all participants."

7. The supplier has renewed the floor markings in the sewing section.

8. "The supplier will train the workers and afterwards will apply the prohibition smoking rule. The supplier will prepare specific place for smoking.

The supplier needs time until everything is done."

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not provide secondary containment for the chemicals in the chemical storage area. Additionally there was no chemical spill kit. HSE.1

2. The factory does not provide Material Safety Data Sheets in local language of the workers, most of the MSDS forms were in English. HSE.10

3. The factory does not provide MSDS forms, written instructions on the usage of chemicals, and what should be done in case of emergency in the sections where chemical used. MSDS forms are only posted in the chemical storage area. HSE.10

4. There is only one eye wash station in the chemical storage area, although workers use chemicals in washing section and spray section.

Local Law or Code Requirement

Egyptian Labor Law 12/2003, Book 5, Article 211; FLA Workplace Code (Health, Safety & Environmental Benchmarks HSE.1, HSE.6, and HSE.10)

Recommendations for Immediate Action

1. Provide proper secondary containment for the chemical barrels and chemical spill kit for the chemical storage.
2. Ensure that all MSDS forms are in local language of the workers.
3. Post MSDS forms and safety instructions for chemicals in the areas where the chemicals are used.
4. Provide eye wash stations in the spray and washing sections.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has provided chemical warehouse with a secondary containment for the chemical barrels and chemical spill kit.
2. The supplier has translated all MSDS forms in local language (Arabic language)of the workers.
3. The supplier has posted MSDS forms and safety instructions for chemicals in all sections where the chemicals are used.
4. The supplier has fixed eye wash stations in the spray and all washing sections.

FINDING NO.15

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The kitchen personnel were not wearing gloves or head covers when they are serving the food. HSE.22
2. The factory does not keep food samples for 72 hours to prevent food poisoning. HSE.22
3. The factory does not keep records for workplace accidents. According to the nurse's book, there have been some small accidents, however, management stated there was no workplace accidents. HSE.1, HSE.3

Local Law or Code Requirement

Egyptian Labor Law 12/2003, Book 5, Article 212, 29, 228 FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.3, and HSE.22)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The supplier has instructed the kitchen personnel to wear gloves and head covers when they are serving the food.
2. The supplier has implemented a new system for kitchen staff to ensure that they are keeping food samples for 72 hours to prevent food poisoning.
3. The supplier uses the nurse records, who is reporting to HR manager frequently, in order to complete the workplace accident records as it is requested from government.