



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Hugo Boss AG
COUNTRY: Tunisia
ASSESSMENT DATE: 10/11/17
ASSESSOR: FLA EMEA
PRODUCTS: Apparel
NUMBER OF WORKERS: 2840

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: Training (Macro)

Finding Explanation

1. The factory does not provide any orientation training to workers regarding Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Grievance System, Workplace Conduct & Discipline, Termination & Retrenchment, and Environmental Protection. According to worker interviews, only basic skill training is provided during the hiring process. ER.1, ER.15
2. The factory conducts ongoing training, but not systematically. A new worker may have to wait several months before receiving training. This training only concerns health & safety and some general orientation. ER.28
3. There is no annual training for supervisors, workers, or worker representatives on any of the employment functions. ER.17

Local Law or Code Requirement

Tunisian Labour Law (30.04.1966), Article 66-27; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17, and ER.28)

COMPANY ACTION PLANS

Action Plan no 1.

Description

After the Audit, the factory has launched a training session regarding Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Grievance System, Workplace Conduct & Discipline, Termination & Retrenchment, and Environmental Protection. To avoid this non compliance in the future our training Departement will check regularly this training.

Company Action Plan Update

After the Audit, the factory has launched a training session regarding Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Grievance System, Workplace Conduct & Discipline, Termination & Retrenchment, and Environmental Protection. To avoid this non compliance in the future our training Departement will check regularly this training.

Action Plan no 2.

Description

Monthly training sessions for the new employees were organized to train health and safety at work, internal regulations and the payroll system, which are described in our recruitment policy. The trainings started on February 16, 2018.

Company Action Plan Update

Monthly training sessions for the new employees were organized to train health and safety at work, internal regulations and the payroll system, which are described in our recruitment policy. The trainings started on February 16, 2018.

Action Plan no 3.

Description

All workers including supervisor are being trained as explained in point 1.1 . The factory launched a training session for 2018.

Company Action Plan Update

All workers including supervisor are being trained as explained in point 1.1 . The factory launched a training session for 2018.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. The factory does not conduct regular internal audits, except for health and safety issues. ER.19

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.19)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has implemented internal audits in its management system. This is carried out twice a year.

Company Action Plan Update

The factory has implemented internal audits in its management system. This is carried out twice a year.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory does not provide apprentices who are transferred to the factory before completing two year of work with a new contract that includes their new working conditions. After being transferred to the factory, the hourly rate for these workers is changed, without updating their original contract. ER.1, C.1.2

2. Although its in line with local law, factory uses repetitive short-term contracts (between 1 and 3 months) for a period of up to 4 years; 20% of the whole workforce are contract workers and are affected by this practice. ER.9

3. While the factory has a performance review system that complies with legal requirements, it does not demonstrate linkages to job grading, prohibit discrimination, or provide written feedback. ER.29

4. The factory has prepared job descriptions of all employees. However, the factory does not have copies signed by workers, and the job descriptions are missing some details (supervisor's role in promotion, annual leaves, disciplinary actions, etc.) ER.1

5. The factory does not employ any disabled workers. Local law requires that if a factory has more than 100 employees, then disabled workers must make up at least 2% of its staff. ER.14

Local Law or Code Requirement

Tunisian Law, Article 64; Tunisian Labour Law, Article 15-5, 81-46 (29 May 1981) completed by Law No: 89-52 (14 March 1989); The new Tunisian law on disabled workers, number 41, dated 16 May 2016; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.9, ER.14, and ER.29; Compensation Benchmark C.1.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory started to change the contracts including the new working conditions.

Company Action Plan Update

The factory started to change the contracts including the new working conditions.

Action Plan no 2.

Description

The factory is working on this finding. The HR Department will avoid short term contracts of three months in the future.

Company Action Plan Update

06/28/18 : They have started reducing short- term contract (between 1 and 3 months) actually 13% of workforce are with short contracts instead of 20%.

Action Plan no 3.

Description

The evaluation performance will be tracked to avoid discrimination in hiring .The action is in progress but the system is not in place yet

Company Action Plan Update

06/28/18 : They have completed the drafting of their policy of performance evaluation please see in attachement .The next step will be the application of this procedure.

Action Plan no 4.

Description

The factory has prepared the job descriptions for all employees and had them signed.

Company Action Plan Update

The factory has prepared the job descriptions for all employees and had them signed.

Action Plan no 5.

Description

The factory is aware of the problem. To hire the required number of disabled workers, the HR did a convention with a training Center of disabled workers.

Company Action Plan Update

The factory is aware of the problem. To hire the required number of disabled workers, the HR did a convention with a training Center of disabled workers.

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory does communicate its Compensation policies, procedures, and possible updates to the general workforce; during the assessment 50% of the interviewed workers had a hard time understanding the details of their monthly payslips. ER.16.1

2. Pay slips are in French, not Arabic (the language most workers speak), and no translation materials are provided. C.17.1

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.16.1; Compensation Benchmark C.17.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Not available

Company Action Plan Update

The factory communicated the rules of the compensation policy in their internal training.

Action Plan no 2.

Description

Since February the factory has added some Arabic words into the pay slip. The factory is currently working on translating the entire pay slip in Arabic

Company Action Plan Update

06/28/18 : Programming work is not completed to make all the pay slips in Arabic. But in addition to the training conducted they will provide their workers this month with an explanatory pay slip.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. Workers have to apply for a badge from their supervisors to go to bathroom. Only one badge is available for each production line, and workers have to wait until the badge is returned to use the bathroom. H/A.7

Local Law or Code Requirement

FLA Workplace Code (Harassment or Abuse Benchmarks H/A.7)

Recommendations for Immediate Action

1. Cease using bathroom badges in sewing section.

COMPANY ACTION PLANS

Action Plan no 1.

Description

A general note is sent to the heads of department ironing to cease the practice of use of badges for restroom. Thus the factory confirms that this practice is entirely prohibited.
Instead, they have posted signs to make our workers aware to avoid using phone calls in restroom .

Company Action Plan Update

A general note is sent to the heads of department ironing to cease the practice of use of badges for restroom. Thus the factory confirms that this practice is entirely prohibited.
Instead, they have posted signs to make our workers aware to avoid using phone calls in restroom .

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

1. The factory has policies and procedures on Termination, but not Retrenchment. ER.1, ER.16, ER.32

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16 and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has completed the retrenchment policy in accordance with the legislation.

Company Action Plan Update

The factory has completed the retrenchment policy in accordance with the legislation.

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

The factory does not have a breastfeeding room; local law requires factories to provide one, regardless of the number of female workers. At the time of the assessment, there were 54 lactating women working in the factory. ND.8.1

Local Law or Code Requirement

Tunisian Law, Article 64; FLA Workplace Code (Non-Discrimination Benchmark ND.8.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory now provides a breastfeeding room as required by law.

Company Action Plan Update

The factory now provides a breastfeeding room as required by law.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory stores empty chemical containers outside, where they are exposed to the weather. HSE.1

2. There are compressed air leaks in the sewing, spraying, and washing sections. The factory does not have standard procedures for turning off lights when there is no work at a workstation. ER.31, HSE.1

3. Total capacity is not marked on secondary containment containers. HSE.1

Local Law or Code Requirement

Tunisian Law No. 96-41 (10 June 1996) Article 2, Decree N° 97-1102 of 2 June 1997, modified by Decree N° 2001-843 of 10/04/2001; Official

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory has provided a covered area to store empty chemical containers This temporary storage is recovered by agreed collector every 3 days in accordance with the legal regulations. This policy is mentioned in the policy of chemical management.

Company Action Plan Update

The factory has provided a covered area to store empty chemical containers This temporary storage is recovered by agreed collector every 3 days in accordance with the legal regulations. This policy is mentioned in the policy of chemical management.

Action Plan no 2.

Description

The Factory has a energy service which is concerned by energy saving actions. There is a procedure in saving energy which mentions the actions and regular checks. Also, there is a responsible person for every are to turn off the lights.

Company Action Plan Update

The Factory has a energy service which is concerned by energy saving actions. There is a procedure in saving energy which mentions the actions and regular checks. Also, there is a responsible person for every are to turn off the lights.

Action Plan no 3.

Description

The total capacity is marked on secondary containment containers.

Company Action Plan Update

The total capacity is marked on secondary containment containers.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. Solid waste is not separated by type, and cardboard cartons and plastic is stored together in the production area. HSE.1
2. Solid waste is stored in hazardous waste containers (sludge carts). HSE.1
3. Oil-contaminated water from the dryer and compressor is directly discharged to the outside environment. HSE.1

Local Law or Code Requirement

Tunisian Law No. 96-41 (10 June 1996) Article 2, Decree N° 97-1102 of 2 June 1997, modified by Decree N° 2001-843 of 10/04/2001; Official Bulletin No. 49 of 18 June 1996 on the Management and Control of the Waste and Disposal; Decree No. 2000-2339 of 10 October 2000; FLA Workplace Code (Health, Safety, & Environment Benchmark HSE.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory trained all workers on environmental rules such as separation between solid and dangerous waste to ensure that the storage of waste is correct. Additionally they labelled all containers and posted signs above the sludge container.

Company Action Plan Update

The factory trained all workers on environmental rules such as separation between solid and dangerous waste to ensure that the storage of waste is correct. Additionally they labelled all containers and posted signs above the sludge container.

Action Plan no 2.

Description

The water from the compressor is stored now in a small tank which will be discharged into our water treatment plant .This procedure is also added in our environmental rules. It will be checked by the HSE Manager regularly.

Company Action Plan Update

The water from the compressor is stored now in a small tank which will be discharged into our water treatment plant .This procedure is also added in our environmental rules. It will be checked by the HSE Manager regularly.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. In cutting building, some shelves are seriously bent due to a forklift crash, and are likely to collapse. HSE.1, HSE.13
2. Some platforms in warehouse areas and wastewater treatment plant do not have handles, are unstable, are movable, and do not have wheel-locks. HSE.14
3. In the scrapping and washing sections the electrical boxes and wiring of several machines have been fixed with tape. HSE.1, HSE.14
4. The air tank safety vents have not been well maintained, and they do not look functional. HSE.13
5. Air tanks are not fixed to their permanent locations. HSE.13, HSE.1

Local Law or Code Requirement

Tunisian Labour Code, Articles 152-2, 46; FLA Workplace Code (Health, Safety, & Environment Benchmark HSE.13 and HSE.14)

Recommendations for Immediate Action

1. Repair all damaged shelves.
2. Stabilize the platforms in the warehouse areas and wastewater treatment plant.
3. Fully repair all machines.
4. A system should be implemented to ensure that safety vents are in good working condition; conduct monthly tests of the vents.
5. Affix air tanks to their permanent locations.

COMPANY ACTION PLANS

Action Plan no 1.

Description

All damaged uprights and beams are replaced and repaired . Also we have strengthened our racks control by a verification which will be carried out daily.

Company Action Plan Update

All damaged uprights and beams are replaced and repaired . Also we have strengthened our racks control by a verification which will be carried out daily.

Action Plan no 2.

Description

The factory has launched the purchasing of platforms. They will provide further information once they are delivered and built.

Company Action Plan Update

The factory has launched the purchasing of platforms. They will provide further information once they are delivered and built.

Action Plan no 3.

Description

The detected electrical panels have been repaired. To make our maintenance technicians more aware we have organized an awareness training.

Company Action Plan Update

The detected electrical panels have been repaired. To make our maintenance technicians more aware we have organized an awareness training.

Action Plan no 4.

Description

Using their computerized maintenance management system "Maximaint", the factory has developed the control task for the pressure vessels .
These checks will be done monthly to avoid any possible malfunction and corrosion. The traceability will be kept on this system.

Company Action Plan Update

Using their computerized maintenance management system "Maximaint", the factory has developed the control task for the pressure vessels .
These checks will be done monthly to avoid any possible malfunction and corrosion. The traceability will be kept on this system.

Action Plan no 5.

Description

The compressed air tanks have been fixed to their permanent location.

Company Action Plan Update

The compressed air tanks have been fixed to their permanent location.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The alarm zone names are not posted next to the fire alarm panels. HSE.1
2. The factory has not conducted a fire alarm battery capacity calculation. HSE.1
3. The factory does not conduct fire detector spray and internal tests. HSE.5
4. Some of the marked fire extinguisher locations do not have fire extinguishes in place. HSE.1, HSE.6.1
5. Two of the fire doors in building one are not fire resistant and capable of sealing smoke. HSE.1, HSE.5.1
6. Some of the fire extinguishers are not well marked. HSE.5.1
7. One emergency light in the scrapping section was not operational. HSE.1
8. Some of the evacuation assembly areas are close to the building or to the car parking area. HSE.5.1, HSE.4, HSE.1
9. There are no fire detectors in recently walled and separated areas, like the boiler room and washing laboratory. HSE.1, HSE.4
10. Two emergency exits in the cutting building do not have illuminated exit signs. HSE.1
11. One emergency exit in the training center building is opens inwards. HSE.1, HSE.5.1

Local Law or Code Requirement

Recommendations for Immediate Action

1. Properly mark all fire extinguishers and ensure that extinguishers are available at the marked locations.
2. Ensure that all emergency lights are operational, and that exit signs are illuminated.
3. Install fire detectors in all areas of the factory.
4. Rehang exit doors so that they open in the direction of evacuation.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The alarm zone names are posted near the fire alarm panels.

Company Action Plan Update

The alarm zone names are posted near the fire alarm panels.

Action Plan no 2.

Description

The calculation has been conducted. The battery is conform.

Company Action Plan Update

The calculation has been conducted. The battery is conform.

Action Plan no 3.

Description

The factory has launched the fire detector internal tests. See the report of the last control and a photo during the last tests. The maintenance Manger will assure this control regularly.

Company Action Plan Update

The factory has launched the fire detector internal tests. See the report of the last control and a photo during the last tests. The maintenance Manger will assure this control regularly.

Action Plan no 4.

Description

The factory erased all old markings of changed extinguishers .

Company Action Plan Update

The factory erased all old markings of changed extinguishers .

Action Plan no 5.

Description

The factory is purchasing these fire doors, to change them upon receipt.

Company Action Plan Update

06/28/18 : The doors are bought and delivered from Germany. Once they are received and mounted they will send photos.

Action Plan no 6.

Description

The factory has reviewed all fire extinguishers and marked their locations.

Company Action Plan Update

The factory has reviewed all fire extinguishers and marked their locations.

Action Plan no 7.

Description

The emergency light in the scrapping section was changed. The factory reconfirms that the control of emergency light is tested every month and included in maximaint. Mr Eltaief our maintenance manger is the responsible of the regular check.

Company Action Plan Update

The emergency light in the scrapping section was changed. The factory reconfirms that the control of emergency light is tested every month and included in maximaint. Mr Eltaief our maintenance manger is the responsible of the regular check.

Action Plan no 8.

Description

The factory has changed the previous evacuation assembly areas as mentioned .For the training centre the assembly area is now far from the parking area (Finding 11.8_photo1).For the main building it was so near the building and now is changed to other area (Finding11.8_photo2).

Company Action Plan Update

The factory has changed the previous evacuation assembly areas as mentioned .For the training centre the assembly area is now far from the parking area (Finding 11.8_photo1).For the main building it was so near the building and now is changed to other area (Finding11.8_photo2).

Action Plan no 9.

Description

Those Area are recently arranged ;and now are equipped by the necessary fire detectors.

Company Action Plan Update

Those Area are recently arranged ;and now are equipped by the necessary fire detectors.

Action Plan no 10.

Description

The factory has added the necessary signs in the tow exits.

Company Action Plan Update

The factory has added the necessary signs in the tow exits.

Action Plan no 11.

Description

The factory has done the necessary work to change the mentioned door open in the direction of evacuation.

Company Action Plan Update

The factory has done the necessary work to change the mentioned door open in the direction of evacuation.

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Some of the chairs are not adjustable and are made from wood without suitable cushion. HSE.1, HSE.7
2. About 10% of the workstations are not adjustable. HSE.1, HSE.7
3. Most of the workers provided with anti-fatigue mats do not use them. HSE.1, HSE.7

Local Law or Code Requirement

Tunisian Law, Decree No: 68-328 of October 22nd, 1968, Chapter 5, Article 11; Tunisian Labor Code, Article 152-2 and 46; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 and HSE.7)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Most of our chairs have been changed during 2017, block by block. The company bought new chairs to replace non-adjustable chairs.

Company Action Plan Update

Most of our chairs have been changed during 2017, block by block. The company bought new chairs to replace non-adjustable chairs.

Action Plan no 2.

Description

The company is working on adding some devices to make them adjustable.

Company Action Plan Update

06/28/18 : The company is working on adding some devices to make them adjustable.

Action Plan no 3.

Description

They arranged meetings with workers to insist on importance, also have posted posters to explain the importance of the anti-fatigue mats.

Company Action Plan Update

They arranged meetings with workers to insist on importance, also have posted posters to explain the importance of the anti-fatigue mats.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Although several chemicals used at the factory contain formaldehyde, there is no system in place for progressively substituting hazardous chemicals with less hazardous alternatives. HSE.9
2. 20% of the MSDS forms are not in the local language (Arabic). HSE.10
3. There is no designated stain-removing section, workers use the spray in the production area. HSE.9
4. Chemical containers in the washing and dyeing sections are not properly labeled. HSE.9, HSE.1
5. No eyewash kit is provided in the washing laboratory. HSE.6
6. The eyewash stations do not have protective caps. HSE.6
7. Acetylene and oxygen tubes, used as welding material, are stored in the open, and are not secured to prevent falling. HSE.1

Local Law or Code Requirement

Tunisian Law 152.2; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.9, HSE.6 and HSE.10)

Recommendations for Immediate Action

1. Ensure that all MSDS forms are available in the local language.
2. Properly label all chemicals.
3. Provide an eyewash kit in the washing laboratory.

4. Secure the acetylene and oxygen tubes to prevent falling.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The company has been continuously searching with chemical suppliers to use less hazardous chemicals, example certified green screen products, also promoting more sustainable processes. In addition they have mentioned this requirement in their purchasing chemical policy. The HSE Manager will check regularly this point.

Company Action Plan Update

The company has been continuously searching with chemical suppliers to use less hazardous chemicals, example certified green screen products, also promoting more sustainable processes. In addition they have mentioned this requirement in their purchasing chemical policy. The HSE Manager will check regularly this point.

Action Plan no 2.

Description

They have translated now all MSDS in local languages and they have posted it above chemical containers .This rules is added in their policy.

Company Action Plan Update

They have translated now all MSDS in local languages and they have posted it above chemical containers .This rules is added in their policy.

Action Plan no 3.

Description

They have arranged a tow stain removing section isolated from the production area.

Company Action Plan Update

They have arranged a tow stain removing section isolated from the production area.

Action Plan no 4.

Description

hey have all chemical containers labelled .This rule is indicated in their chemical management policy (Finding 8.1_chemichal page 5).Noura Hammami will control this point.

Company Action Plan Update

They have all chemical containers labelled .This rule is indicated in their chemical management policy (Finding 8.1_chemichal page 5)

Action Plan no 5.

Description

They have equipped now the washing laboratory with eyewash kit.

Company Action Plan Update

They have equipped now the washing laboratory with eyewash kit.

Action Plan no 6.

Description

They have equipped the eyewash stations with protective caps.

Company Action Plan Update

They have equipped the eyewash stations with protective caps.

Action Plan no 7.

Description

They stored the acetylene and oxygen tubes secured by a metal cage in the maintence workshop . Their HSE Manager will check

regularly this rule.

Company Action Plan Update

They stored the acetylene and oxygen tubes secured by a metal cage in the maintenance workshop . Their HSE Manager will check regularly this rule.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The interlocks on one of the laser machines has been disabled. Furthermore, some workers were storing their personal belongings and drinking water bottles in these machines. HSE.14
2. There is no eye protection warning sign at the entrance of laser section. HSE.8
3. Workers in the laser section are not provided with protective eyewear. HSE.7
4. The warning signs for the laser machines are missing following information: Laser Class, wavelength, power, and colour of the laser. HSE.14
5. No lightning rods have been installed for the Denim House, Cutting Building and Training Building. HSE.1

Local Law or Code Requirement

Tunisian Law 152.2; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.9, and HSE.14)

Recommendations for Immediate Action

1. Ensure that interlocks on the laser machines are in good working condition.
2. Install an eye protection warning sign and provide workers with protective eyewear.
3. Ensure that drinking water bottles and personal belongings are not stored in the laser machines.
4. Ensure that the warning signs in the laser section include the laser class, wavelength, power, and color of the laser.
5. Provide lightning protection for the Denim House, Cutting, and Training Buildings.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The non-functional interlocks have been repaired. In addition as a preventive action they have posted signs to oblige workers to check visually the good working condition of the interlocks. Prohibition of storing water bottles and any material in the laser machines.

Company Action Plan Update

The non-functional interlocks have been repaired. In addition as a preventive action they have posted signs to oblige workers to check visually the good working condition of the interlocks. Prohibition of storing water bottles and any material in the laser machines.

Action Plan no 2.

Description

They have posted in the entrance of our laser department a warning sign.

Company Action Plan Update

They have posted in the entrance of our laser department a warning sign.

Action Plan no 3.

Description

According to the machine manufacturer please see the manual of the machine Finding 14.3_pdf the personnel must wear glasses in the absence of visors or their machines are equipped with it please see finding 14.3_photo1

Company Action Plan Update

According to the machine manufacturer please see the manual of the machine Finding 14.3_pdf the personnel must wear glasses in the absence of visors or their machines are equipped with it please see finding 14.3_photo1

Action Plan no 4.

Description

They have posted warning signs now that contain laser class, wavelength, power and colour of laser.

Company Action Plan Update

They have posted warning signs now that contain laser class, wavelength, power and colour of laser.

Action Plan no 5.

Description

They have completed the installation of the lighting rods in Denim house and the training building.

Company Action Plan Update

They have completed the installation of the lighting rods in the denim house and the training building.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The distance between the stone and tool support on the grinding machine is too wide, much more than 3 mm. HSE.14
2. Workers change the position of the sewing machine finger guards, rendering them ineffective. HSE.14
3. A small section of steam lines is not insulated. HSE.13
4. There are high noise levels, exceeding 80dB, around some overlock machines and some automatic stitching machines in the new building. The factory does not provide hearing protection to workers in these areas. HSE.8
5. Some workers in the spraying section use dust masks and particle filter masks (FFP1), while others use respirators. The processes in this area require respirators. HSE.7

Local Law or Code Requirement

Tunisian Law 152.2; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.7, HSE.08, HSE13, and HSE.14)

Recommendations for Immediate Action

1. Adjust the grinding machine support so that it is the correct distance.
2. Ensure that finger guards are in the correct position.
3. Provide hearing protection to workers in high noise areas, and train workers on their use.
4. Provide respirators to all workers in the spraying section, and train workers on the importance of using the correct PPE.

COMPANY ACTION PLANS

Action Plan no 1.

Description

They have adjusted the mentioned machine. The Mechanical manager will regularly check the machine.

Company Action Plan Update

They have adjusted the mentioned machine. The Mechanical manager will regularly check the machine.

Action Plan no 2.

Description

They have trained all workers in health and safety rules including sewing machine finger guards. In addition they have posted signs to make their workers more aware. The correct use of this guards will be checked during internal audits by their HSE manager.

Company Action Plan Update

They have trained all workers in health and safety rules including sewing machine finger guards. In addition they have posted signs to make their workers more aware. The correct use of this guards will be checked during internal audits by their HSE manager.

Action Plan no 3.

Description

The small section of steam line is insulated now.

Company Action Plan Update

The small section of steam line is insulated now.

Action Plan no 4.

Description

They have reviewed and measured again the locations with high noise level to provide with necessary equipment. Already started in lines.

we have provided the necessary PPE against noise in the new building .And to ensure that all concerned workers are equipped with hearing protection we have communicate our PPE procedure to supervisors in the mentionned area .

Company Action Plan Update

They have provided the necessary PPE against noise in the new building. And to ensure that all concerned workers are equipped with hearing protection they have communicate their PPE procedure to supervisors in the mentioned area .

Action Plan no 5.

Description

They have trained their workers in health and safety rules including using masks .Please see the training register (Finding 1.1_register) and some photos during awareness. Their HSE Manager will check the implementation of this rule.

Company Action Plan Update

They have trained their workers in health and safety rules including using masks .Please see the training register (Finding 1.1_register) and some photos during awareness. Their HSE Manager will check the implementation of this rule.

FINDING NO.16

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The drinking water analysis report does not include a chemical analysis. HSE.23, HSE.1
2. The location of sampling for water analysis is not included in the report. HSE.23
3. There is no drinking water analysis for the training center and cutting building. HSE.1, HSE.23
4. The dust analysis report given does not define the type of dust being measured. HSE.2
5. The amount of dust in the air is increased by the use of compressed air for cleaning purposes. HSE.1, HSE.9
6. The automatic cutting machine's exhaust pipe is not connected to outside the factory. HSE.1, HSE.9

Local Law or Code Requirement

Tunisian Law, Decree No:68-328 (22 October 1968), Chapter 5, Tunisian Law, Decree n° 2000-1985 of September 12th 2000, Chapter 1, Article 5 & Chapter 4, Article 30; Tunisian Labour Code, Article 152-2 Master Collective Agreement, Article 46; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.2, HSE.9, and HSE.23)

COMPANY ACTION PLANS

Action Plan no 1.

Description

The new reports done after the audit include the chemical analysis. To avoid this non-compliance in the future they have mentioned in our health and safety monitoring procedure the chemical analysis and the person responsible for the regular checks.

Company Action Plan Update

The new reports done after the audit include the chemical analysis. To avoid this non-compliance in the future they have mentioned in our health and safety monitoring procedure the chemical analysis and the person responsible for the regular checks.

Action Plan no 2.

Description

The new reports done after the audit are including the location of the water analysis.

Company Action Plan Update

The new reports done after the audit are including the location of the water analysis.

Action Plan no 3.

Description

The water analysis for the training centre are done. To avoid this non-compliance in the future they have added in their health and safety monitoring procedure this control and the person responsible for the regular checks.

Company Action Plan Update

The water analysis for the training centre are done. To avoid this non-compliance in the future they have added in their health and safety monitoring procedure this control and the person responsible for the regular checks.

Action Plan no 4.

Description

The dust analysis of the factory is performed annually so in the next report they will define the type of dust being measured.

Company Action Plan Update

They asked for a quote from a specialized laboratory. The next step will be the validation of this price offer and the realization of these measures.

Action Plan no 5.

Description

The cleaning is ensured now by vacuum cleaners. They have designed two operators who perform a regular planning of cleaning in accordance to their health and safety policies in attachment . Mr Abdelnacer Khelifa will regularly check this policies.

Company Action Plan Update

The cleaning is ensured now by vacuum cleaners. They have designed two operators who perform a regular planning of cleaning in accordance to their health and safety policies in attachment . Mr Abdelnacer Khelifa will regularly check this policies.

Action Plan no 6.

Description

The automatic cutting machine's exhaust pipe does not release any gas. Please see in attachment an email received from the manufacture of the machine .

Company Action Plan Update

The automatic cutting machine's exhaust pipe does not release any gas. Please see in attachment an email received from the manufacture of the machine .

NOTABLE FEATURE

FINDING TYPE: Compensation

Finding Explanation

1. The factory organizes several social activities, including; sporting and cultural activities, and picnics organized by management for the workers.
2. An additional clothing allowance is provided for all workers.
3. There is one additional pay per year, paid as a bonus.

COMPANY ACTION PLANS

Action Plan no 1.

Description

The factory organizes several social activities, including; sporting and cultural activities, and picnics organized by management for the workers.

This Finding is named as notable feature. Hugo Boss strongly supports its supplier to improve workers condition due to extras.

Company Action Plan Update

The factory organizes several social activities, including; sporting and cultural activities, and picnics organized by management for the workers.

This Finding is named as notable feature. Hugo Boss strongly supports its supplier to improve workers condition due to extras.

Action Plan no 2.

Description

An additional clothing allowance is provided for all workers.

This Finding is named as notable feature. Hugo Boss strongly supports its supplier to improve workers condition due to extras.

Company Action Plan Update

An additional clothing allowance is provided for all workers.

This Finding is named as notable feature. Hugo Boss strongly supports its supplier to improve workers condition due to extras.

Action Plan no 3.

Description

There is one additional pay per year, paid as a bonus.

This Finding is named as notable feature. Hugo Boss strongly supports its supplier to improve workers condition due to extras.

Company Action Plan Update

There is one additional pay per year, paid as a bonus.

This Finding is named as notable feature. Hugo Boss strongly supports its supplier to improve workers condition due to extras.