



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Fast Retailing Co., Ltd.

COUNTRY: Tunisia

ASSESSMENT DATE: 10/16/17

ASSESSOR: FLA EMEA

PRODUCTS: Apparel

NUMBER OF WORKERS: 1300

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 or procedures regarding any of the Employment Functions except for Hiring and Health & Safety. ER.1, ER.19, ER.23, ER.25, ER.27, ER.28, ER.29, ER.30, ER.31, ER.32
2. The factory does not conduct periodic internal assessments of working conditions. ER.1
3. There is no system in place for controlling the employment conditions of subcontractors, such as conducting external assessments. ER.1
4. The factory has not implemented a system to review and update all of its policies, procedures, and internal regulations. ER.1

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.19, ER.23, ER.25, ER.27, ER.28, ER.29, ER.30, ER.31, and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The review of procedures will be done department by department and will touch all the factory. Some procedures are already done such as:
 - a. Anti-discrimination procedure.
 - b. Human rights procedure.
 - c. Anti-corruption procedure.
 - d. Employee suggestions procedures.Other procedures are in progress.
2. An internal assessments of working conditions will be done monthly.
3. A periodical assessment will be done to control employment conditions of subcontractors.
4. An annual review will be done for the existant procedures and the factory is checking the missing procedures to implement them.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The orientation training provided to new workers only covers basic skill training. It does not include an explanation of the workplace rules, Compensation package, Human Resource (HR) policies, Industrial Relations and Freedom of Association, or Health & Safety. Furthermore, the factory does not provide workers with written documentation of the orientation training content. Also, a new worker may have to wait several months before being trained on the factory rules. ER.15
2. The factory does not provide specific training to the relevant supervisors on any of the Employment Functions. ER.1 ER.17 ER.27
3. The factory does not provide specific training to workers on any of the Employment Functions. ER.1 ER.15
4. The factory does not provide ongoing training to workers on any of the Employment Functions, except for some components of Health & Safety (first aid, fire-fighting, ergonomics). ER.1

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.27; Health, Safety & Environment Benchmarks HSE.8, HSE.9, and HSE.14)

COMPANY ACTION PLANS

Action Plan no 1.

Description

No action needs to be done since all of findings are improved.

Company Action Plan Update

1. The factory has implemented a system of welcome booklet that contain all the necessary information in HR and security and it will be explained to all the new employees. (Completed by 31-Dec-2018).
- 2 & 3. Factory has been started to set an annual training plan from 01/01/2017. They already done some training in modelisme. (Completed by 01-Jan-2017).
4. Factory has been started to set an annual training plan from 01/01/2017.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

1. The factory does not communicate its policies and procedures and their updates to the general workforce across all Employment Functions. ER.1 ER.16 ER.25 ER.27 ER.29 ER.30 C.17
2. The worker involvement component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, ER.25, ER.27, ER.29, and ER.30; Compensation Benchmark C.17)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The general procedures will be posted and periodically meeting will be instated with all employees to explain directly the procedures.

Company Action Plan Update

2. A suggestion box is putted on to the workers to express freely.

With the implementation of the suggestion box, a procedure defining who is in charge of the box, who treats the suggestions and how workers are informed about the actions done following their suggestions. This procedure was posted in the bulletin board and workers representatives, many workers was informed directly about it (with meetings).

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

1. The factory does not regularly review or update its policies and procedures on any of the Employment Functions. ER.1 ER.29 ER.30 ER.31

Local Law or Code Requirement

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

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. An annual review will be done for the existant procedures and the factory is checking the missing procedures to implement them.

FINDING NO.5

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory uses repetitive short-term contracts (between a duration of one to six months) for a period of up to four years. 30% of the workforce are employed under these contracts. While this practice is in line with the local law, it is in violation of FLA benchmarks. Also, no copy of the contract is provided to these workers. ER.9, ER.11

2. The factory only employs three disabled workers. Local law requires that if a factory has more than 100 employees, disabled workers must make up at least two percent of the workforce, which translates to 11 disabled workers for this factory given the size of the workforce. Since the factory already employs 3 disabled workers, it needs employ 8 more. ER.3 ND.1 ND.9

Local Law or Code Requirement

Law Number 41 of May 16, 2016 on Disabled Workers; FLA Workplace Code (Employment Relationship Benchmarks ER.3, ER.9 and ER.11; Non-Discrimination Benchmarks ND.1 and ND.9)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Factory is applicable local law for the short term contract
They are okay for giving a copy of contract.
2. The factory will contact the training centers and disabled association to ensure the hiring of new disabled employees.

FINDING NO.6

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory only has written job descriptions prepared for supervisory and management positions; there are no job descriptions for workers. Furthermore, the supervisors' and managers' job descriptions are lacking many details (e.g. a supervisor's role in performance evaluations and disciplinary proceedings), and are not signed by the employee. ER.1

2. The factory does not provide workers with written copies of their employment contracts. ER.5

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.5)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. For the management factory will review the existant procedures and for the workers factory will review the job descriptions cards will be in each post.

Job descriptions procedures will be the base of the evaluation grid that factory already begin to do for workers.

As an action plan, with the hiring of any new person some steps have to be verified:

- a. The presence of job description and if not a new card have to be done for this job.
- b. The accordance between the job requirement and the new employee skills.

Company Action Plan Update

2. the factory gives a copy of each contract to the workers.

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory employs 14 apprentices on two-year contracts (four six-month periods). Eight of these workers are young workers between 16 and 18 years old.

a. These apprentices are paid less than the national minimum wage of 358 TND (151.94 USD). While this practice is in line with local law, it is in violation of FLA benchmarks.

b. Furthermore, these apprentices are paid less than even the legal minimum apprentice wage. Local law allows apprentices to be paid 30, 40, 50, and 60% of the minimum wage respectively for every six-month period: e.g. 108 TND (43 USD) per month during the first six

months, 143 TND (57 USD) per month during the second six months, etc. However, apprentices were paid 90 TND (36.26 USD) per month during the first six months and 120 TND (48.35 USD) during the second six months of their apprenticeship. ER.11, ER.13, CL.1, CL.8, C.1, C.2, C.3

2. Workers' pay slips are in French, not Arabic (the language most workers speak). There is no translation posted anywhere. As a result, all of the workers interviewed by assessors had trouble understanding the details of their monthly payslips and don't know about some of the wage components. C.17.1

Local Law or Code Requirement

Law Number 94-1600 of July 18, 1994 on Apprentice wages ; FLA Workplace Code (Employment Relationship Benchmarks ER.11 and ER.13.1 and ER.16.1; Child Labor Benchmarks CL.1 and CL.8; Compensation Benchmarks C.1, C.2, C.3, and C.17.1)

Recommendations for Immediate Action

1. While local law allows for pay below the minimum wage for apprentices, pay all workers at least the minimum wage.

COMPANY ACTION PLANS

Action Plan no 1.

Description

No action needs to be done since all of findings are improved.

Company Action Plan Update

1. For the previous paid wages the factory has calculated the difference between the paid wage and the legal minimum wage and this difference has been given to the apprentices by slices. In the same time, factory corrects the minimum wage in their data base.
2. The translation in arabic was posted in the audit day but assessors didn't see it and it's posted until now.

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The factory's time keeping system is not used effectively. Although no inconsistencies were identified, assessors observed that workers do not use the fingerprint readers on days when there is no overtime work; instead, the system automatically generates an exit time of 5:10 pm. ER.2, ER.23

2. The factory's security guards work 60 hours per week on a continuous basis. HOW.1

3. The factory does not have a system in place to identify workers who are pregnant and breastfeeding. HOW.5

4. While the factory does provide 1 paid hour of breastfeeding at the beginning or at the end of the work day as per local law, it does not have a breastfeeding room, although local law requires factories to provide one regardless of the number of female workers. At the time of the assessment, there were 54 workers breastfeeding. ND.1 ND.8

Local Law or Code Requirement

Tunisian law: Labor code articles 64 and 79; FLA Workplace Code (Hours of Work Benchmarks HOW.1 and HOW.5; Employment Relationship Benchmarks ER.2 and ER.23; Non-Discrimination Benchmarks ND.1 and ND.8.1)

Recommendations for Immediate Action

1. Ensure that fingerprint readers are used for all hours worked, including regular hours.
2. Provide a breastfeeding room.

COMPANY ACTION PLANS

Action Plan no 1.

Description

No action needs to be done since all of findings are improved.

Company Action Plan Update

1. Factory is added one other printer to facilitate the printing to their staff, Now the most of our staff point when leaving. (Completed by 31-Dec-2018).
2. There is no guards that works 60 hours per week.
3. Factory has a listing of pregnant and breastfeeding workers.
4. The workers can use the Infirmary as a breastfeeding room.

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. Workers have to ask their supervisors for the restroom pass in order to go to the restroom. There is only one pass is available for each production line, and workers have to wait until the pass is returned to use the restroom. There is an exception to this rule for pregnant and sick workers. H/A.7 HSE.21

Local Law or Code Requirement

FLA Workplace Code (Harassment or Abuse Benchmark H/A.7; Heath, Safety & Environment Benchmark HSE.21)

Recommendations for Immediate Action

1. Cease the practice of requiring workers to ask for a restroom pass. Allow workers to use the restroom whenever they need. Do not restrict the number of workers who can use the restroom at one time.

COMPANY ACTION PLANS

Action Plan no 1.

Description

No action needs to be done since finding is improved.

Company Action Plan Update

1. The number of restroom passes exceed the number of restrooms so even if the workers are free to go an any time they will wait for their turn in restrooms.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. While the interviewed workers stated that they freely communicate with the HR manager, the factory has not implemented a system that allows workers to report grievances confidentially, such as suggestion boxes. ER.1 ER.25
2. The factory does not maintain documentation in relation to the grievance process. ER.2

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, and ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

No action needs to be done since all of findings are improved.

Company Action Plan Update

1. A suggestion box is putted on to the workers to express freely.
2. A grievance procedure is done and its respectation is insured by the HR manager.

FINDING NO.11

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. There are no capacity labels on the chemicals' secondary containers. HSE.1 HSE.9
2. Paint buckets and a used mineral oil container are stored outdoors, exposed to the elements. HSE.1 HSE.9
3. Mixed solid waste is stored in an open environment in the waste storage area and production area. HSE.1 ER.31 HSE.9
4. Oil-contaminated water is discharged directly from the compressor and compressor vessel into the outside environment. HSE.1 HSE.9
5. The factory's Environmental Impact Assessment dates back to 2009 and was not renewed, as required by local law, after changes were made to the production areas and processes and a new building was constructed. HSE.2 HSE.4

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 June 18, 1996 on the Management and control of the waste and disposal; Law no. 2000-2339 of October 10, 2000 on the List of hazardous waste; Law no. 2005-1991 of July 11, 2005 on Legally required environmental impact analysis; FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety, & Environment Benchmarks HSE.1, HSE.2, HSE.4, HSE.5, and HSE.9)

Recommendations for Immediate Action

1. Affix capacity labels on secondary containers.
2. Ensure that chemical containers and solid waste are stored safely, indoors.
3. Stop direct discharge of oil-contaminated water into the outside environment.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. A capacity labels will be posted in the storage place of oils.
4. A compressor bleed will be fixed correctly into the ground to avoid any flight discharge to the environment.
5. Factory will contact the appropriate service to renew the environment assessment.

Company Action Plan Update

2. The factory was painting some structures in the building and the outsider agent does not collect basket after finishing.
3. Mixed solid waste are already thrown.

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Some of the storage rack support beams in the warehouse area are bent. Assessors also noted that some of the welding repairs to these beams pose a potential risk of collapse. HSE.1
2. The factory does not have a structural safety report to prove that all buildings and additions are structurally safe. The mezzanine floor which is used as warehouse, and workers work underneath this section, does not have a structural safety report. There are also cracks in the walls of both factory buildings and some of the mezzanine floor beams appear to be bending/buckling. HSE.1
3. The air tanks and compressors are not fixed to their permanent locations. HSE.14, HSE.1
4. The factory does not properly implement a lockout-tagout (LOTO) program by locking out equipment when needed. HSE.14
5. There are 300mA residual-current devices (RCD) in some sections throughout the factory, instead of 30mA RCDs. HSE.13, HSE.1
6. Some of the 30mA RCDs in the canteen areas do not work properly. HSE.13, HSE.1
7. There are no insulator mats in front of the electrical panels. HSE.13, HSE.1
8. There is no lightning protection installed on either factory building. HSE.13, HSE.1
9. The live and neutral wires are reversed in some sections at Building 1 and many sections in Building 2. HSE.13, HSE.1
10. Some electrical panels do not have cover-panel grounding. HSE.13, HSE.1
11. The electrical panel in the compressor room is not properly maintained. It does not have a cover, the cables are loose, and there is no internal isolation. HSE.13, HSE.1
12. Not all of the factory's sockets and extension plugs are grounded. HSE.13, HSE.1
13. Two of the factory's electrical panels have overheated due to a lack of maintenance. The second floor panel in Building 2 heated up to 96 degrees Celsius and was fixed during the assessment. The first floor panel in Building 2 was 65 degrees Celsius. HSE.13, HSE.1
14. The roof of the chemical warehouse in Building 1 is made of roofing material that contains asbestos.
15. There are no procedures in place for maintenance workers who might come into contact with this material. HSE.1

Local Law or Code Requirement

Tunisian Labour Code, Article. 152-2, 46; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. Regularly inspect and maintain the racks in the warehouse area. Immediately repair any bent racks or welding issues.
2. Contract an accredited/certified agency to obtain a structural safety report to prove that all buildings and additional sections are structurally safe.
3. Affix air tanks and compressors to their permanent locations.
4. Ensure proper implementation of LOTO program.
5. Prepare and implement a plan to replace 300mA RCDs with 30mA ones in production areas.
6. Write and implement a procedure to periodically test the RCDs throughout the factory as annual tests are not enough to keep them all in good working condition. Provide a multifunction test device with RCD testing capacity for the maintenance team and ask them to conduct periodic tests and keep all relevant documentation.
7. Place insulator mats in front of all electrical panels.
8. Install lightning protection for all buildings.
9. Ensure that electrical wiring work carried out in a professional manner and there are no live-neutral reverse wiring in any part of the factory buildings. Provide a multifunctional test device for the maintenance team and ask them to conduct periodic tests.
10. Identify any electrical panels without cover-panel grounding connections and maintain them accordingly.
11. Install a cover on the electrical panel in the compressor room.

12. Ensure that all sockets/extension plugs are with grounding connection.

13. Identify and fix overheated electrical panels. Regularly inspect and maintain all electrical panels to prevent problems like this.

COMPANY ACTION PLANS

Action Plan no 1.

Description

2. A structural safety analysis is already done for the mezzanine floor and it's congruent, for the building the control office is already contacted and they are in progress.
3. The compressors and air tanks will be fixed in their permanent locations.
4. Factory defines for those equipment specific electrical cabinet. They shut down the electrical alimentation of those equipment to prohibit the manipulation.
5. Some electrical cabinet are already checked and totally replaced by new ones, other are in recheck.
6. Factory begins to repair some one and they are in progress for the rest.
7. The factory is doing a complete check up its electrical installation and the problem will be resolved.
8. The lightning protection will be installed.
9. The factory is doing a complete check up its electrical installation and the problem will be resolved.
10. The factory is doing a complete check up its electrical installation and the problem will be resolved.
12. The factory is doing a complete check up its electrical installation and the problem will be resolved.

Company Action Plan Update

1. These beams are well fixed from the roof and ground. (Completed by 31-Dec-2018).
11. The panel is already covered.
13. The problem was already fixed in the audit day and the auditor states this.
14. The existing roof doesn't contain already any asbestos, It's asbestos-free.
15. The existing roof doesn't contain already any asbestos, It's asbestos-free, the origin of the non-compliance doesn't exist because there is not any asbestos.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The names of the alarm zones are not posted next to the fire alarm panels. HSE.6
2. The factory does not perform battery capacity calculations for the fire alarm panels. HSE.6
3. The factory does not periodically test its smoke detectors and fire alarm panels. HSE.6
4. There are a lot of cigarette butts on the ground around Building 1. HSE.1
5. Many of the fire extinguishers located in the production and warehouse areas are CO2 fire extinguishers. However, there is a risk of a type A fire in these areas. HSE.1 HSE.6
6. Although they are not locked during working hours, there are padlocks on some of the factory's emergency exit doors. HSE.5
7. 10% of emergency exit direction signs are not illuminated. HSE.5
8. There are no fire detectors in the trim storage area. Furthermore, there are only CO2 fire extinguishers in this section, which are not suitable for the type of fire risk in the trim storage area. HSE.6

9. Some fire extinguishers in the leftover material warehouse in Building 1 have been moved away from their designated locations, so the markings indicating the location of fire extinguishers are not accurate. - HSE.6
10. There is only a local fire detector in warehouse area in Building 1, which is not connected to the centralized fire alarm system.
11. There is a redundant emergency exit light in the fabric test laboratory in Building.
12. There are no documented tests or maintenance activities for the fire pump. HSE.6
13. The fire extinguisher markings are not visible from all directions. HSE.6
14. One emergency light in Building 2 is not working. HSE.5 HSE.6
15. Fire drills are not conducted by shutting down the power of the buildings. HSE.5
16. There are no liquid petroleum gas (LPG)detectors in the canteen area where LPG is in use. HSE.6
17. The locations of the two fire alarm buttons has been changed, but these changes are not reflected in the emergency evacuation plan.
18. The emergency exit in the women's changing room on the first floor of Building 1 floor opens inwards. HSE.5
19. There are no fire detectors in the following areas: the forklift battery charging area, the trim storage area, the electrical room, the mezzanine floor, the leftover material warehouse, or the second floor warehouse in Building 2. HSE.5 HSE.6
20. The factory does not have a valid fire license (prevention certificate) as required by local law. They have just started the certification process by signing a contract with a consultancy firm that will prepare all the necessary files. HSE.4 ER.2
21. There is no training for workers on evacuation procedures. Nor is there system in place to account for all workers during an emergency evacuation. HSE.5.

Local Law or Code Requirement

Law Number 2009-11 of March 2, 2009, Article 3; Law Number 2009-11 of March 2, 2009, Article 4; Law Number 2009-11 of March 2, 2009, Article 6; Tunisian Labor Code, Article 152, Paragraphs 2 and 46; FLA Workplace Code (Employment Relationship Benchmark ER.2; Health, Safety & Environment Benchmark HSE.1, HSE.4, HSE.5, and HSE.6)

Recommendations for Immediate Action

1. Post the names of the alarm zones next to fire alarm panels.
2. Perform battery capacity calculations for the fire alarm panels. Keep all relevant documentation.
3. Periodically test all smoke detectors and fire alarm panels. Keep all relevant documentation.
4. Post "No Smoking" signs around Building 1.
5. Replace the CO2 type fire extinguishers placed in the production and warehouse areas with dry chemical powder fire extinguishers or other suitable fire extinguishers.
6. Prepare and implement a strict written procedure to ensure that the padlocks on the emergency exit doors are removed by security during working hours.
7. All emergency exit direction signs will be illuminated.
8. Install fire detectors in the trim storage area and replace the CO2 type fire extinguishers in this section with dry chemical powder fire extinguishers or other suitable fire extinguishers.
9. Place fire extinguishers in all designated fire extinguisher locations.
10. Connect the local fire detector in the Building 1 warehouse area to the fire alarm system.
11. Remove the redundant emergency exit light in the Building 1 fabric test laboratory.
12. Document all tests and maintenance activities for the fire pump.
13. Ensure that fire extinguisher markings are visible from all directions.
14. Regularly inspect and maintain all emergency lights. Repair the broken emergency light in Building 2.

15. Shut off the power in all factory buildings during fire drills so that the functionality and performance of the emergency alarms and illumination systems can be tested.
16. Install LPG detectors will be installed in the canteen area where LPG is in use.
17. Update the emergency evacuation plan to reflect any changes to the location of fire alarm buttons.
18. Renovate the emergency exit in the changing room on the first floor of Building 1 so that it opens outwards.
19. Locate fire alarm panels in security cabins where 24/7 supervision is available.
20. Install fire detectors in the following areas: the forklift battery charging area, the trim storage area, the electrical room, the mezzanine floor, the leftover material warehouse, and the second floor warehouse in Building 2.
21. Train workers on safe evacuation procedures and establish a system to ensure all workers are accounted for in case of an emergency evacuation.

COMPANY ACTION PLANS

Action Plan no 1.

Description

5. Factory refers to the periodical check of APAVE to implement the right extinguishers in the right place. In progress, some of extinguishers are already added other in progress.
7. The none functional lights will be repaired. Factory has set a procedure to periodical control every 3 months.
8. Factory is verifying because those extinguishers were recommended by specialized expert. The fire detectors are already set up in the trim storage area.
9. The external factory that comes doing the external inspection of extinguishers has moved some fire extinguishers and their maintenance person does not check already after the outsider agent of control; an immediate control will be done when the outsider person come to check, a person from our maintenance service will be with him to check one per one and write a report.
10. In factory process from changing from a centralized alarm system, they didn't delete all the local fire detectors.
13. Beams containing extinguishers will be marked in all directions.
14. The none functional lights will be repaired. Factory has set a procedure to periodical control every 3 months.
15. Fire drills will be conducted by shutting down the power of the building.
16. A liquid petroleum gas will be set up.
17. The emergency evacuation plan will be rectified for this time and factory will do in the future a recheck for the emergency evacuation plan every time when they do works in the buildings.
18. The opening direction of the emergency exit will be unversed.
19. Factory will set up fire detectors in the requested places. Action done in the mezzanine floor and electrical room and the trim storage area and the second warehouse on the second building.
20. The factory has already get the classification of the unit and still wait for the fire certificate which is a governmental issue.
21. The factory will ensure a training for evacuation.

Company Action Plan Update

1. The alarm zones will be posted next the fire panels.
2. Every 3 months factory shuts the electricity to the panel and they verify how much the energy on the battery can remain.
3. The smoke detectors are already tested every 3 months from the beginning of 2019.
4. A smocking area was identified and all the workers are informed that smocking is forbidden all over the rest of building.
6. A procedure was set up and guards are informed to remove totally the padlocks from the emergency doors and put them only when the factory is closed.
11. This building is transformed to other department and the emergency exit is eliminated.

12. The fire pump will be controlled. Factory already set up a maintenance activity plan.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There is a sandblasting machine in the maintenance room which is not for production, but used by maintenance team from time to time for sandblasting of some machine parts. There is a risk of maintenance worker's exposure to sand from sandblasting machine at the maintenance room as there is an opening at the hand inserting section on this machine. HSE.1 HSE.7
2. The table saw guard is not positioned properly on the table saw in the cutting section, and is not adjusted to correctly guard the workers hands. HSE.1, HSE.14
3. The maximum and working pressure levels are not posted on the pressure vessel manometers. HSE.1, HSE.14
4. The grinding machines, drills, and metal processing machines in the maintenance sections of both factory buildings are not equipped with the proper protective guards. HSE.1, HSE.14
5. About 10 of the sewing machines are missing finger guards and one overlock machine is missing an eye shield. HSE.1, HSE.14
6. Workers are charged if they lose their Personal Protective Equipment (PPE), uniforms, or tools. HSE.7
7. The workers are not trained in the use and maintenance of PPE. HSE.8
8. The air tanks' safety vents are not properly maintained. They are vulnerable to corrosion and some are already corroded. HSE.14
9. One forklift is missing a seat belt. HSE.1 HSE.14
10. The factory is not taking proactive steps to reduce repetitive-motion stress and injuries. 50% of the chairs in the factory are not adjustable and 50% are not constructed of a suitable material. Many workers have complained and some have modified their chairs by adding cushions to make them more comfortable. Furthermore, 20% of the workstations in the factory are not adjustable, and none of the standing workers in the pressing and cutting section have been provided with anti-fatigue mats. HSE.17

Local Law or Code Requirement

Law no. 68-328 of October 22, 1968, ch. 5, art. 11; Tunisian Labor Code, Article 152 para 2 and 46; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.14, HSE.15, and HSE.17)

Recommendations for Immediate Action

1. Ensure that the sandblasting machine in the maintenance room is well maintained and properly guarded.
2. Train workers on the proper use of machinery and ensure that the table saw guard is positioned properly during the cutting operations.
3. Post the maximum and working pressure levels on the pressure vessel manometers.
4. Install the proper protective guards on the grinding machines, drills, and metal processing machines in the maintenance sections of both buildings.
5. Install finger guards on all sewing machines and eye shields on all overlock machines.
6. Stop charging workers for PPE, uniforms, and tools.
7. Train workers on the use and maintenance of PPE.
8. Regularly inspect and maintain all air tank safety vents. Repair any corroded safety vents.
9. Install seat belts in all forklift trucks.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Factory is contacting the constructor of the machine to find a solution to the protection until that the machine is stocked as out of order.
3. The pressure levels manometers will be posted as requested.
4. 70% of the guards re already provided.
5. Some operators on machines eliminates the protection, we set up a regular check and a sensibilisation is done to operators for the risks involved.
8. The periodical maintenance will be done every 2 months, vents will be maintained.
10. The factory set up a plan from 2017 to buy between 50 and 100 chair every year and this is already done for 2017 and 2018. The action still in progress, the chairs that exist xwas already adjustable and factory is buying step by step new ones that are also adjustable.

Company Action Plan Update

2. The position of the table saw guard is already changed.
6. This is an old procedure not adapted now.
7. The workers will be trained in the use of maintenance PPE.
9. The seat is already repaired.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory uses some hazardous stain remover chemicals with toluene, n-hexane, ethyl benzene, etc . There is no system in place to progressively switch from hazardous chemicals to less hazardous alternatives. HSE.1
2. Workers are not trained on chemical safety. HSE.9
3. Only four out of six Material Safety Data Sheets (MSDS) were available for assessors to review. Furthermore, none of the four available MSDS were in the local language, i.e., Arabic. Two were in French with the 16 necessary sections, while the other two were in English with less than the16 necessary sections. HSE.2 HSE.10
4. The stain removing sections, where hazardous chemicals are used, are not totally isolated from other areas. HSE.9
5. The stain removing operator was not provided with protective goggles. HSE.7
6. There is no eyewash station in Building 1 near the stain-removing machine. HSE.6
7. The stain removing chemical is being stored in an empty battery water container. HSE.9

Local Law or Code Requirement

Tunisian Labor Code Article 152 para 2; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.2, HSE.6, HSE.7, HSE.9, and HSE.10)

Recommendations for Immediate Action

1. Design and implement a system to progressively replace hazardous chemicals with less hazardous alternatives.
2. Make the MSDS forms of all chemicals in use in the factory available in Arabic and post them in areas where the chemicals are being stored and used.
3. Isolate the stain removing sections from other factory areas.
4. Provide protective glass for the stain removing operator.
5. Install an eyewash station in Building 1 near the stain removing machine.

6. Cease the practice of using empty chemical containers to storing other chemicals.

COMPANY ACTION PLANS

Action Plan no 1.

Description

No action needs to be done since all of findings are improved.

Company Action Plan Update

1. the factory didn't use this stain remover any more. The stain remover was replaced directly by a new stain removal that is in public sell and which is less dangerous.
2. The workers are already trained in chemical safety. The workers were trained one the MSDS of the used chemical products.
3. It's difficult to find MSDS in arabic all the available MSDS are in french or in English but they translate the FDS which are important to be recognized by all the user of the products, factory continues translating all the MSDS. They have only oil now and the fds are in the link.
- 4 & 5 & 6 & 7. The stain removal is no more used, The photo date from the March 2018.

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There is no system in place for analyzing the hygiene of drinking water dispensers in either building. Furthermore, there is no system in place to periodically clean the drinking water dispensers or change the drinking water filters. HSE.1, HSE.23
2. The factory uses compressed air for cleaning purposes which increases the concentration of dust in the air. HSE.1, HSE.19
3. The automatic cutting machine's exhaust pipe is not connected to the outside and therefore, exhaust is discharged inside the factory. HSE.1, HSE.13
4. The potable and non-potable water sources are not labeled. HSE.1, HSE.23
5. The factory does not have a system to track all illnesses. HSE.1, HSE.3

Local Law or Code Requirement

Tunisian Law, Decree No:68-328 (22 October 1968, Chapter 5) on Hygienic conditions to ensure in factories; Tunisian Law, Decree no 2000-1985 of September 12th 2000, Chapter 1, Article 5 & Chapter 4, Article 30 on Analysis and assessments related to workers' health to be performed in the factories; Tunisian Labour Code, Article 152-2 on the Obligation of the employer to provide workers with all necessary tools, assessments, trainings and documents in order to avoid accidents and ensure a safe working condition; Master Collective Agreement dated 29 May 1973, Article 46; On health and safety conditions in industrial factories; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.3, HSE.13, HSE.19, and HSE.23)

Recommendations for Immediate Action

1. Design and implement a system to periodically test the drinking water in both buildings. Design and implement a system to periodically clean all drinking water dispensers and change all drinking water filters.
2. Stop using compressed air for cleaning purposes. If compressed air must be used to clean certain areas, drop the pressure to two bars.
3. Connect the cutting machine's exhaust pipe to the outside.
4. Label potable and non-potable drinking water sources as such.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. For the analyzing water: Factory uses the potable water of the country which is already analysed.

Periodically clean drinking water dispensers is done. An annual analyzing will be done.

A procedure that define the date of periodical analyzing water and the date of the clean of the drinking water dispensers and filter is set up, in fact:

a. the drinking water dispensers and filter will be cleaned every 6 months

b. the water will be analysed every time from one dispensers each year.

3. The technology of our cutting vector lectra machines doesn't require exhaust pipe because it's integrated on the machine, factory sends to lectra to give as the certification about the conformity of installation.

4. The potable and non-potable water will be labeled. Some of sources are already labelled others are not.

Company Action Plan Update

2. Some of air compressed tapes that factory can eliminate are already submitted to prohibit the use.

Periodical survey by different people are regular done to ensure the not use of compressed air.

5. Every worker have to undergo an annual medical check insured by work doctor.

FINDING NO.17

NOTABLE FEATURE

FINDING TYPE: Compensation

Finding Explanation

1. The factory provides workers monthly non-mandatory bonuses of 20 TND to 150 TND (8.06 USD to 60.50 USD), based on the individual's or group's production efficiency.

2. The factory gives out a monthly cash prize of 50 TND (20.16 USD) to the best worker in Site 1 and the best worker in Site 2.

3. The factory acts as a guarantor for permanent workers' bank credit.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Findings are checked. Factory will update as soon as possible.