



FAIR LABOR
ASSOCIATION®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Kathmandu
COUNTRY: Israel
ASSESSMENT DATE: 10/25/17
ASSESSOR: FLA EMEA
PRODUCTS: Apparel
NUMBER OF WORKERS: 200

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

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

The factory's evening shift is from 4:30pm to 01:30am, which should be considered a night shift. According to the document review, six out of fifteen workers in the Sandal Department worked the night shift for more than one week during a three-week period. The records are as follows: two workers in January, one worker in February, two workers in April, one worker in July, and one worker in September. HOW.1.1

Local Law or Code Requirement

Israel Hours of Work and Rest Law 5711-1951 chapter 5 (22a); FLA Workplace Code (Hours of Work Benchmark HOW.1.1)

Recommendations for Immediate Action

Ensure that the workers do not work the night shift for more than one week during a three-week period.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

1.1 Implementation (Hours of Work)

Details

Immediate Action (IA)

Ensure that the workers do not work the night shift for more than one week during a three-week period.

Sustainable Improvement (SI)

1. Train HR and related personnel on changes
2. Include in worker handbook.
3. Include changes on worker orientation and training.
4. Monitor implementation

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

Accepted. The factory had revised relevant policy and posted in the factory. Training is provided as well.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

The factory only has an open-door policy or a verbal communication process via production managers as a grievance and suggestion system. Although this channel can be confidential, there is no anonymous channel to convey grievances. Additionally, the factory does not keep documentation or records related to the grievance process so there is no evidence that the factory reviews and acts on grievances. ER.2, ER.25

Local Law or Code Requirement

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

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

2.1 Policy and Procedure (Grievance System)

Details

IA

1. Develop Policy and Procedures on grievance mechanisms
2. Set up a system that allows for such grievances including an anonymous mechanism.
3. Retain documentation on grievances.

SI

1. Appoint relevant HR and related personnel to be responsible for grievance policy and procedure.
2. Include training on the same for managers and supervisors and workers.
3. Create system to monitor and record all grievances and periodically review.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

Accepted. The factory had established a grievance policy and added

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

The workers on the Health & Safety Committee are not elected by the workers, but by the production managers for each department. These workers are only responsible for conveying Health & Safety related issues, rather than being a dialogue or communication mechanism. ER.25, FOA.11, FOA.10

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25, Freedom of Association Benchmarks FOA.10 and FOA.11)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

3.1 Industrial Relations and Freedom of Association (Workers' Participation and Integration)

Details

IA

1. Include representatives elected by the workers in Health and Safety Committee.
2. Inform workers that this committee can act as a dialogue and communication mechanism for them.

SI

1. Communicate the change to workers through bulletin boards, employee handbooks, new worker orientation and trainings.
2. Include as part of ongoing training for workers.
3. Create system to monitor, record and address Health and Safety issues raised by workers.
4. Monitor implementation

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

Accepted. The factory had established the policy. Now The Safety Committee includes 10 members. Five out of them are workers, elected by production departments in according to Health & Safety Committee. Committee meeting was hold as well.

FINDING NO.4

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. There are chemical barrels outside of factory Building 6 on a wooden pallet without secondary containment. These barrels are there to be discharged because the dates are expired. HSE.9
2. There is a portable glue vessel in the assembly section in Building 5 without secondary containment and there is a spill around this vessel. Additionally, glue cans are placed directly on the ground where this chemical is used throughout the factory. HSE.9
3. There is no label on the hazardous waste storage area. HSE.9

Local Law or Code Requirement

Regulation of Ministry of Environment on "Conditions of Protective Vessels, Storage, Collection and Production Pallets for Liquid Hazardous Substances", Article 1 and Part D Article 1.2; Hazardous Substances Law 5733-1993 Article 6; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1 and HSE.9)

Recommendations for Immediate Action

1. Provide proper secondary containment for all chemicals in the factory.
2. Properly store all chemicals and chemical waste in a restricted area.
3. Place a label on the chemical waste storage area.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

4.1 Environmental Protection

Details

IA

Provide proper secondary containment for all chemicals in the factory.

SI

1. Review current environmental policy and procedures
2. Revise policies to align with legal requirements.
3. Train relevant staff on changes.
4. Include changes in worker orientation and trainings.
5. Create system to monitor incidents that have an environmental impact.
6. Monitor implementation

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Action Plan Title

4.2 Environmental Protection

Details

IA

Properly store all chemicals and chemical waste in a restricted area.

SI

1. Review current environmental policy and procedures
2. Revise policies to align with legal requirements.
3. Train relevant staff on changes.
4. Include changes in worker orientation and trainings.
5. Create system to monitor incidents that have an environmental impact.
6. Monitor implementation

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 3.

Description

Action Plan Title

4.3 Environmental Protection

Details

IA

Place a label on the chemical waste storage area.

SI

1. Review current environmental policy and procedures
2. Revise policies to align with legal requirements.
3. Train relevant staff on changes.
4. Include changes in worker orientation and trainings.
5. Create system to monitor incidents that have an environmental impact.
6. Monitor implementation

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 4.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

4.1 Accepted. The factory had provided secondary protection vessels to all chemicals. The factory had provided relevant trainings and they were also ISO14001:2015 certified in 2019.

4.2 Accepted. The factory had provided secondary protection vessels to all chemicals. The factory had provided relevant trainings and they were also ISO14001:2015 certified in 2019.

4.3 Accepted. The factory had labelled all chemicals. The factory had provided relevant trainings and they were also ISO14001:2015 certified in 2019.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The grinder machine in the maintenance room does not have an eye protection guard. HSE.14
2. One worker was not using the provided earplugs in the sandal department, despite the noise level being above 85 DB. HSE.7
3. One of the warehouse workers was not wearing safety boots even though factory provides them. HSE.8
4. The workers removed or moved the finger and the eye protection guards of the sewing machines. HSE.7, HSE.8
5. There is no eye wash station in Building 5 where chemicals are used. HSE.9
6. The factory does not track illnesses. HSE.1, HSE.3
7. One of the medicines (IODO VIT -antiseptic solution) in the first aid box in Building 5 was expired. HSE.6

Local Law or Code Requirement

Israel Labor Inspection (Organization) Law 5714 - 1954, Chapter 1, Section 6(a), Safety at Work Regulations (Personal Protective Equipment), 1997 Article 8, Work Safety Ordinance (New Version), 5730-1970, Article. 140; FLA Workplace Code (Employment

Recommendations for Immediate Action

1. Provide a proper eye protection guard for the grinder machine.
2. Ensure that all workers use Personal Protection Equipment for required departments and workstations, such as earplugs and protection boots.
3. Do not remove or move sewing machine guards and ensure that workers use them effectively.
4. Install an eye wash station in the department where chemicals are used.
5. Inspect first aid boxes regularly and replace medicines before they expire.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

5.1 Health and Safety

Details

IA

Provide a proper eye protection guard for the grinder machine.

SI

1. Create or amend Health and safety Policy and Procedure addressing safe use of eye protection on machines
2. Provide Health and safety training to all employees on the safe use of eye protection ensuring that all staff have and wear eye protection before using.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Action Plan Title

5.2 Health and Safety

Details

IA

Ensure that all workers use Personal Protection Equipment for required departments and workstations, such as earplugs and protection boots.

SI

1. Create or amend Health and safety Policy and Procedure addressing safe use of ear protection on machines
2. Provide Health and safety training to all employees on the safe use of ear protection ensuring that all staff have and wear suitable ear protection before using.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 3.

Description

Action Plan Title

5.3 Health and Safety

Details

IA

Ensure that all workers use Personal Protection Equipment for required departments and workstations, such as earplugs and protection boots.

SI

1. Create or amend Health and safety Policy and Procedure addressing safe use of foot protection on machines
2. Provide Health and safety training to all employees on the safe use of foot protection ensuring that all staff have and wear

suitable foot protection before using.
Planned Completion Date
04/25/18

Planned completion date
01/12/18

Action Plan no 4.

Description

Action Plan Title

5.4 Health and Safety

Details

IA

Do not remove or move sewing machine guards and ensure that workers use them effectively.

SI

1. Create or amend Health and safety Policy and Procedure addressing safe use of machinery and guards on machines
2. Provide Health and safety training to all employees on the safe use of machinery and ensuring that all machines have guards attached before using.
3. Create a procedures for the monitoring of safe use of the sewing machines.

Planned Completion Date
04/25/18

Planned completion date
01/12/18

Action Plan no 5.

Description

Action Plan Title

5.5 Health and Safety

Details

IA

Install an eye wash station in the department where chemicals are used.

SI

1. Create or amend Health and safety Policy and Procedure addressing eye washing facilities in the chemical warehouse and any other hazardous areas.
2. Provide Health and safety training to all employees on the correct use of eye washing facilities
3. Create procedures for ensuring that all areas of the factory have the relevant installed eye washing facilities and equipment to deal with any incidents.

Planned Completion Date
04/25/18

Planned completion date
01/12/18

Action Plan no 6.

Description

Action Plan Title

5.6 Health and Safety

Details

IA

1. Appoint an appropriate HR person to review factory process of tracking worker illness.
2. Assign this person responsibility for tracking any illnesses.

SI

1. Review policy and procedures tracking illnesses.
2. Conduct a root-cause analysis of illnesses to see whether there are factory or work related illnesses.
3. Train HR personnel to follow up on repeated illnesses.
5. Monitor implementation and progress.

Planned Completion Date
04/25/18

Planned completion date

01/12/18

Action Plan no 7.

Description

Action Plan Title

5.7 Health and Safety

Details

IA

Inspect first aid boxes regularly and replace medicines before they expire.

SI

1. Appoint relevant HR and related personnel to be responsible for first aid kits and their restocking.
2. Include training for employees in factory on who to contact for first aid kit replacement materials; the location of first aid kits in the factory; steps for reporting work-related incidents and how to request new suppliers.
3. Create system to monitor and record the use and replacement of first aid kit supplies.
4. Monitor implementation

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 8.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

5.1 Accepted. The glass screens are installed on the grinding machines. In addition, employees are provided with the safety glasses. Notices are posted. Safety trainings are provided.

5.2 Accepted. Employees are provided with the safety ear plugs. Relevant notices are posted. Safety trainings are provided.

Employees involved in works with harmful noise are going through annually hearing tests. Noise tests are conducted bi-annually as per legal requirements. Using of PPE is under control of Safety Committee (see minutes of the meetings)

5.3 Accepted. Employees are provided with the safety boots. Relevant notices are posted. Safety trainings are provided.

Using of PPE is under control of Safety Committee

5.4 Accepted. The safety screens are re-installed on the sewing machines. Safety trainings are provided.

5.5 Accepted. The eye wash station is installed . Relevant board is posted. Trainings are conducted.

5.6 Accepted. HR manager and Safety are responsible persons for health of the employees at the facility. The facility acts in according to the acting legislation. All incidents and accidents are investigated and reported to authorities. Job Safety Assesemnt is conducted for each typical work station and included in 2020 Safety Program.

5.7 Accepted. The factory had replaced the expired medicine. There is appointed responsible person for each first aid kit. The content of the kits are inspected each quarter. The medicines with dates close to expiration are replaced timely.

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory uses temporary electrical extension cables instead of establishing a permanent wiring system in the warehouse in Building 9. HSE.13
2. The electrical board in the warehouse in Building 6 is blocked by goods. HSE.13
3. The factory does not have a lightning protection system. HSE.13
4. The factory does not implement a lockout-tagout program by locking out equipment when needed. HSE.14

Local Law or Code Requirement

Safety at Work Regulations (Electricity) - 1990, Articles 2 and 4(b); FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.13, and HSE.14)

Recommendations for Immediate Action

1. Install a permanent wiring system in the factory instead of using temporary extension cables.
2. Remove all obstructions from electrical boards and surrounding areas. Ensure that electrical boards are free from obstructions.
3. Provide a proper lightning protection system for the factory.
4. Implement a lockout-tagout program by locking out equipment when needed.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

6.1 Health and Safety

Details

IA

Install a permanent wiring system in the factory instead of using temporary extension cables.

SI

1. Create or amend Health and Safety Policy and Procedure addressing maintaining electrical wiring and electrical outlets.
2. Provide Health and safety training to all employees on identifying any electrical wiring and electrical outlets that need repair or permanent rewiring.
3. Create procedures for the regular maintenance of all electrical wiring and electrical outlets.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Action Plan Title

6.2 Health and Safety

Details

IA

Remove all obstructions from electrical boards and surrounding areas. Ensure that electrical boards are free from obstructions.

SI

1. Create or amend Health and Safety Policy and Procedure addressing maintaining electrical wiring and electrical panels.
2. Provide Health and safety training to all employees on identifying any electrical wiring and electrical panels that need repair or cleaning.
3. Create procedures for the regular maintenance of all electrical wiring and electrical panels.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 3.

Description

Action Plan Title

6.3 Health and Safety

Details

IA

Provide a proper lightning protection system for the factory.

SI

1. Create or amend Health and Safety Policy and Procedure addressing the lightning protection system.
2. Provide training or source external training for all employees who need to be certified in testing the lightning protection system.
3. Create procedures to ensure that all rods in the lightning protection system are certified and have the necessary legal permits.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 4.

Description

Action Plan Title

6.4 Health and Safety

Details

IA

Implement a lockout-tagout program by locking out equipment when needed.

SI

1. Create or amend Health and Safety Policy and Procedure addressing a lockout-tagout system (LOTO) and create a list of equipment and machinery that require the LOTO procedure and of those workers to carry out the procedure.
2. Provide training or source external training for all employees who need to be upskilled in a lockout-tagout system (LOTO) and how to create a list of equipment and machinery that require the LOTO procedure.
3. Create procedures for the regular updating and renewal of all lockout-tagout systems and equipment and machinery that require the LOTO procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 5.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

6.1 Accepted. The facility organizes regular inspections of the electrical system. The report, signed by the certified engineer is held. Permanent wiring cables are installed in the factory instead of using temporary extension cables, where needs. The training of technicians was conducted.

6.2 Accepted. The regular inspections are conducted by Safety Supervisor on weekly base. Trainings of employees are conducted at least annually. Relevant notices require employees to keep access to electrical boards free.

6.3 Accepted. The factory holds Business License that covers Engineering Permit. The lighting hazard was assessed in Safety

Program. In addition, electrical system are regularly inspected and approved by a certified engineer. The finding was re-checked with authorities. There is no requirements to have lighting protection system for the buildings of the facility.

6.4 Accepted. The finding was re-checked during updated annual Safety program and JSA. There is no machinery that required LOTO system.

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory does not conduct fire drill annually. The last fire drill was conducted in January 2016. HSE.5
2. There is no system to account for all workers during an emergency evacuation. The fire drill record lacks information on the number of workers evacuated and the duration of the evacuation during the fire drill. HSE.5
3. There is no marked assembly point in the factory. HSE.5
4. The emergency exits of the glue port and the rubber compress sections open out to an alleyway that is blocked at both ends. The only way to reach the assembly area is via a portable ladder leaning against a wall. HSE.5
5. One of the emergency exits in the cutting section in Building 4 was obstructed by goods. Additionally, the other exit door opens to a narrow, sloping, and unsealed route towards the assembly area, which carries the risk of injury in the case of an emergency. There is no direction that leads to the emergency assembly point through this aisle. HSE.5
6. There is no emergency light through the stairs between the emergency exit door and the administrative staff office floor in building 10. HSE.5
7. In the warehouse of Building 6, there is an old emergency exit which is currently unused. However, the exit sign and the old emergency exit route sign have not been removed. Moreover, there is no emergency route sign in the area that directs to the current emergency exit. HSE.5
8. One of the fire extinguishers in the cutting section in Building 4, one in the hydration system section in Building 8, and one in the hydration system section in Building 9 have been removed from their designated place and placed on the ground. HSE.6
9. One of the fire extinguishers in the warehouse in Building 9 has been placed behind the shelves and is not easily accessible.
10. There is no emergency exit sign on the emergency exit door in the warehouse near the cutting section in Building 4. Additionally, the fire hose cabinet was obstructed and the fire extinguisher was on the ground instead of hanging on the wall. Management declared that this section is currently being renovated. HSE.5
11. There are two expired fire hoses in Building 6 (fire box number 8-6). HSE.6
12. None of the factory buildings have an emergency evacuation plan. HSE.5

Local Law or Code Requirement

Israeli Standard 129 Part 2, Israeli Standard 365 Part 3, Regulation 3 out of regulations of services of firefighting 1972, Work Safety Ordinance (new Version) 5730-1970, Article 15, part 126; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5, and HSE.6)

Recommendations for Immediate Action

1. Conduct fire drills at least annually.
2. Ensure that there is a system to account for all workers during evacuation. Keep records of the number of workers evacuated and the time period of fire drill.
3. Designate an assembly area and place a marking for the assembly point.
4. Remove all obstructions from the areas around all emergency exits. Ensure that openings and open to places that easily evacuate in case of emergency. Remove the ladder and all the misleading direction signs in emergency aisles.
5. Ensure that the emergency evacuation routes outside the buildings are wide, protected, and secure so that evacuations are easy evacuate and without risk of injury in the case of emergency.
6. Clear all blockages from the emergency exits, the fire extinguishers, and the fire hose cabinets.
7. Remove all misleading arrows and route signs throughout the factory and correctly place route signs directing to the emergency exits.
8. Hang all fire extinguishers at the correct height on the wall and ensure that the fire extinguisher signs are placed in correct locations.
9. Periodically check the fire hoses and replace them before their expiration dates.
10. Provide emergency evacuation plans to each section according to floor layouts including emergency exits, 'you are here' signs, fire extinguishers and fire alarm buttons.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

7.1 Fire and Emergency Actions

Details

IA

Conduct fire drills at least annually.

SI

1. Create or amend Health and Safety Policy and Procedures addressing fire drills.
2. Provide training and source the necessary equipment for regular fire drills.
3. Create procedures to ensure that the emergency drills are regularly checked and certified.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Action Plan Title

7.2 Fire and Emergency Actions

Details

IA

Ensure that there is a system to account for all workers during evacuation. Keep records of the number of workers evacuated and the time period of fire drill.

SI

1. Create or amend Health and Safety Policy and Procedures addressing evacuation procedures and accounting for worker numbers.
2. Provide training and source the necessary equipment to ensure all workers can be accounted for in the event of an evacuation or emergency.
3. Create procedures to ensure that workers can be accounted for following an evacuation.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 3.

Description

Action Plan Title

7.3 Fire and Emergency Actions

Details

IA

Designate an assembly area and place a marking for the assembly point.

SI

1. Create or amend Health and Safety Policy and Procedures addressing the designated assembly point.
2. Provide training or source external training for all employees on how to evacuate and assemble at the designated assembly point.
3. Place information throughout the factory clearly informing workers where the assembly point is.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 4.

Description

Action Plan Title

7.4 Fire and Emergency Actions

Details

IA

Remove all obstructions from the areas around all emergency exits. Ensure that openings and open to places that easily evacuate in case of emergency. Remove the ladder and all the misleading direction signs in emergency aisles.

SI

1. Create or amend Health and Safety Policy and Procedures addressing all evacuation pathways and directions.
2. Provide training and source the necessary equipment to ensure all evacuation exits are clear, current and direct workers correctly in the event of an evacuation.
3. Create procedures to ensure that exits and evacuation pathways are regularly checked to ensure they open in the direction of the evacuation and are clear.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 5.

Description

Action Plan Title

7.5 Fire and Emergency Actions

Details

IA

Ensure that the emergency evacuation routes outside the buildings are wide, protected, and secure so that evacuations are easy evacuate and without risk of injury in the case of emergency.

SI

1. Create or amend Health and Safety Policy and Procedures addressing the emergency evacuation and clear aisles.
2. Provide training to ensure that aisles are kept clear at all times.
3. Create procedures to ensure that the emergency evacuation system is regularly checked and certified.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 6.

Description

Action Plan Title

7.6 Fire and Emergency Actions

Details

IA

1. Review procedures on fire safety and fire exits
2. Identify what needs to be done to fix and ensure fire exits are illuminated at all times
3. Identify who is responsible for doing so.
3. Implement action by installing illuminating exit signs above all emergency exits.

SI

1. Create or amend Health and Safety Policy and Procedure addressing the regular inspection and testing of the emergency exit lights.
2. Provide training or source external training for all employees who need to be certified in testing the emergency exit lights.
3. Create procedures to ensure that there is a regular testing of the emergency exit lights.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 7.

Description

Action Plan Title

7.7 Fire and Emergency Actions

Details

IA

Remove all misleading arrows and route signs throughout the factory and correctly place route signs directing to the emergency exits.

- SI
1. Create or amend Health and Safety Policy and Procedure addressing the regular inspection and testing of the emergency exit lights.
 2. Provide training or source external training for all employees who need to be certified in testing the emergency exit lights.
 3. Create procedures to ensure that there is a regular testing of the emergency exit lights.
- Planned Completion Date
04/25/18

Planned completion date
01/12/18

Action Plan no 8.

Description

Action Plan Title
7.8 Fire and Emergency Actions
Details
IA

Hang all fire extinguishers at the correct height on the wall and ensure that the fire extinguisher signs are placed in correct locations.

- SI
1. Create or amend Health and Safety Policy and Procedure addressing the regular inspection and testing of the fire hydrants, hoses and nozzles.
 2. Provide training or source external training for all employees who need to be certified in this testing.
 3. Create procedures to ensure that there is a regular testing of this equipment.
- Planned Completion Date
04/25/18

Planned completion date
01/12/18

Action Plan no 9.

Description

Action Plan Title
7.9 Fire and Emergency Actions
Details
IA

Clear all blockages from the emergency exits, the fire extinguishers, and the fire hose cabinets.

- SI
1. Create or amend Health and Safety Policy and Procedure addressing the regular inspection and testing of the fire hydrants, hoses and nozzles.
 2. Provide training or source external training for all employees who need to be certified in this testing.
 3. Create procedures to ensure that there is a regular testing of this equipment.
- Planned Completion Date
04/28/18

Planned completion date
01/12/18

Action Plan no 10.

Description

Action Plan Title
7.10 Fire and Emergency Actions
Details
IA

Post the correct emergency exit signs and clear all obstructions around the fire hose. Mount extinguisher on wall.

SI

1. Create or amend Health and Safety Policy and Procedure addressing the regular inspection and testing of fire exits, the fire hydrants, hoses and nozzles.
2. Provide training or source external training for all employees who need to be certified in this testing.
3. Create procedures to ensure that there is a regular testing of these exits and this equipment.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 11.

Description

Action Plan Title

7.11 Fire and Emergency Actions

Details

IA

Periodically check the fire hoses and replace them before their expiration dates.

SI

1. Create or amend Health and Safety Policy and Procedure addressing the regular inspection and testing of fire exits, the fire hydrants, hoses and nozzles.
2. Provide training or source external training for all employees who need to be certified in this testing.
3. Create procedures to ensure that there is a regular testing of these exits and this equipment.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 12.

Description

Action Plan Title

7.12 Fire and Emergency Actions

Details

IA

Provide emergency evacuation plans to each section according to floor layouts including emergency exits, 'you are here' signs, fire extinguishers and fire alarm buttons.

SI

1. Create or amend Health and safety Policy and Procedure addressing the evacuation plans specific to each building.
2. Provide Health and safety training to all employees on the the evacuation plans specific to each building.
3. Create procedures for ensuring that all areas of the facility have the relevant safety instructions, warning signs, signs and evacuation plans.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 13.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

7.1 Accepted. The last fire drill was conducted in November 2019.

7.2 Accepted. The procedure of fire drill is issued and implemented. The last fire drill was conducted in November 2019. Training

was conducted with emergency teams and employees.

7.3 Accepted. Assembly points at the facility are established. The last fire drill was conducted in November 2019. Training was conducted with emergency teams and employees.

7.4 Accepted. The finding was re-checked during updating of annual Safety Program and JSA. The exit in question was cancelled. The facility holds permit issued by Fire Defense Office for full compliance with the acting legislation.

7.5 Accepted. The finding was re-checked during updating of annual Safety Program and JSA. The exit in question was cancelled. The facility holds permit issued by Fire Defense Office for full compliance with the acting legislation.

7.6 Accepted. The emergency lighting is installed. Regular inspections of emergency lighting is organized. The workers are trained.

7.7 Accepted. The emergency lighting is installed. Regular inspections of emergency lighting is organized. The workers are trained

7.8 Accepted. Safety Supervisor, members of Safety Committee and managers inspect that firefighting equipment is presented on their place weekly. The facility organizes month inspections of level of charging of fire extinguishers. Records of month inspections are kept at the facility. Employees are trained for proper using and keeping of the equipment

7.9 Accepted. Safety Supervisor, members of Safety Committee and managers inspect that firefighting equipment is presented on their place weekly. The facility organizes month inspections of level of charging of fire extinguishers. Records of month inspections are kept at the facility. Employees are trained for proper using and keeping of the equipment

7.10 Accepted. All emergency exit boards in the building are re-checked and found in good working condition. Safety Supervisor, members of Safety Committee and managers inspect that firefighting equipment is presented on their places and intact weekly. Employees are trained for proper using and keeping of the equipment

7.11 Accepted. Safety Supervisor, members of Safety Committee and managers inspect that firefighting equipment is presented on their place weekly. All expired fire hoses are replaced by new ones. Employees are trained for proper using and keeping of the equipment.

7.12 Accepted. Evacuation plans are issued and posted. The employees are trained for understanding of the plans.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Policies & Procedures (Macro)

Finding Explanation

1. The factory does not have written policies and procedures on Compensation, Hours of Work, or Workplace Conduct & Discipline. However, some documents and systems exist. The new employee handbook contains details related to Compensation, Hours of Work, and Workplace Conduct & Discipline but they are not formed as factory policies and procedures. The existing documents do not include a policy on performance reviews. This policy needs to include steps and processes, demonstrate linkages to job grading, prohibit discrimination, provide written feedback, comply with legal requirements, record all warnings and disciplinary actions, and a procedure for workers to appeal the disciplinary action. ER.1, ER.23, ER.27, ER.29
2. The Termination procedures do not include methods for calculating final pay-outs, in accordance with legal requirements. ER.19
3. The factory does not have written policies or procedures on Industrial Relations, Grievance Systems, Retrenchment, or Personnel Development. ER.25, ER.27, ER.28, ER.29, ER.30, ER.32
4. The Health & Safety procedures do not include measures to protect the reproductive health of workers through minimizing exposure to workplace hazards. HSE.12, ND.8
5. The Environmental Protection procedures do not include a section on the protection of workers who allege environmental

violations. HSE.1

6. The factory does not clearly define in writing the person(s) responsible/accountable for industrial relations, grievance system, workplace conduct, or disciplinary actions in each area/department of the factory. ER.1

7. The factory does not review its policies and procedures on a periodic basis. ER.1, ER.29, ER.30

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 and ER.32; Non-Discrimination Benchmark ND.8; Health, Safety & Environment Benchmarks HSE.1 and HSE.12)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

8.1 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible for ensuring policies and procedures exist for all aspects of Compensation, Hours of Work, and Workplace Conduct & Discipline; as well as performance reviews.
2. Develop appropriate policies and procedures related to each category.
3. Create policy and procedures that includes the following steps and processes: demonstrates linkages to job grading, prohibits discrimination, provides written feedback, complies with legal requirements, and records all warnings and disciplinary actions, and a procedures for workers to appeal the disciplinary action.
4. Communicate the policies and procedures to workers.

SI

1. Update worker handbook with all of the policies and procedures.
2. Provide training to all employees.
3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Action Plan Title

8.2 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible for improving procedures to include methods for calculating final pay-outs, in accordance with legal requirements, to relevant workers.
2. Pay the calculated pay outs during termination procedures.

SI

1. Include termination procedures in companywide policy.
2. Provide training to workers on updated procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 3.

Description

Action Plan Title

8.3 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible for creating written policies or procedures on Industrial Relations, Grievance Systems,

Retrenchment, or Personnel Development.

2. Develop appropriate policies and procedures related to each category.

3. Communicate the policies and procedures to workers.

SI

1. Update worker handbook with all of the policies and procedures.

2. Provide training to all employees.

3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 4.

Description

Action Plan Title

8.4 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible for creating Health & Safety procedures to include measures to protect the reproductive health of workers through minimizing exposure to workplace hazards.

2. Develop appropriate policies and procedures related to this.

3. Communicate the policies and procedures to workers.

SI

1. Update worker handbook with all of the policies and procedures.

2. Provide training to all employees.

3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 5.

Description

Action Plan Title

8.5 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible for creating Environmental Protection procedures to include a section on the protection of workers who allege environmental violations.

2. Develop appropriate policies and procedures related to this.

3. Communicate the policies and procedures to workers.

SI

1. Update worker handbook with all of the policies and procedures.

2. Provide training to all employees.

3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 6.

Description

Action Plan Title

8.6 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible for person(s) responsible/accountable for industrial relations, grievance system, workplace

conduct, or disciplinary actions in each area/department of the factory.

2. Develop appropriate policies and procedures related to this.

3. Communicate the policies and procedures to workers.

SI

1. Update worker handbook with all of the policies and procedures.

2. Provide training to all employees.

3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 7.

Description

Action Plan Title

8.7 Policy and Procedure (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible to review its policies and procedures on a periodic basis.

2. Develop appropriate policies and procedures related to include a review.

3. Communicate the policies and procedures to workers.

SI

1. Update worker handbook to include a review of the policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 8.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

2.1 Accepted. The factory had established a grievance policy and added

8.1 Accepted. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The performance review is included under Term 4.8&4.11. The disciplinary action procedure is under 4.7.

8.2 Accepted. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The payment method is included in the policy.

8.3 Accepted. The policies (Ethical Code of Source company) and Human Resource procedures are issued and updated. The employees are trained.

8.4 Accepted. The facility holds updated 2020 Safety Program. As per the program and JSA the facility does not store, use and dispatch any chemicals and machinery that can influence to reproductive health of workers.

8.5 Accepted. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The disciplinary action procedure is under 4.7. The employees are trained.

8.6 Accepted. The responsible person position and name is clearly show in HR procedure. The Ethical Policy is approved and signed by CEO of the company.

8.7 Accepted. The requiemnts to periodical review of the HR procedure and Policy are included in the QA-5.2.04 Internal audits procedure.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The factory provides orientation training to workers but the training lacks sections on Industrial Relations, Recruitment, Hiring, and Personnel Development. ER.15
2. The factory does not provide workers with on-going training on any of the Employment Functions, except for Health & Safety and Environmental Protection. ER.1, ER.15, ER.25
3. The factory does not provide specific training to supervisors on any of the Employment Functions. ER.1, ER.17, ER.27
4. Although there is first aid team, the factory does not have any training records available. HSE.6

Local Law or Code Requirement

Work Safety Ordinance (New Version) 5730-1970, Section148 (a); FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.17 and ER.25, Health, Safety & Environment Benchmark HSE.6)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

9.1 General Training for New Workers

Details

IA

1. Appoint HR person responsible for training to include Industrial Relations, Recruitment, Hiring, and Personnel Development.
2. Develop training on each area.
3. Implement training during orientation.

SI

1. Update worker handbook to include training on Industrial Relations, Recruitment, Hiring, and Personnel Development.
2. Provide training to all new employees.
3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Action Plan Title

9.2 General Training for New Workers

Details

IA

1. Appoint HR person responsible for training to include Industrial Relations, Recruitment, Hiring, and Personnel Development.
2. Develop training on each area.
3. Implement training during orientation.

SI

1. Update worker handbook to include training on Industrial Relations, Recruitment, Hiring, and Personnel Development.

2. Provide training to all new employees.
3. Monitor the implementation of the aforementioned policies and procedures.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 3.

Description

Action Plan Title

9.3 General Training for New Workers

Details

IA

1. Appoint HR person responsible to provide specific training to supervisors on all of the Employment Functions.
2. Develop training in this area.
3. Implement training to supervisors.

SI

1. Provide training to all supervisors.
2. Monitor the implementation of the training.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 4.

Description

Action Plan Title

9.4 General Training for New Workers

Details

IA

1. Appoint person responsible to document and maintain first aid training records.

SI

1. Maintain such records and make available for assessment if necessary.

Planned Completion Date

04/25/18

Planned completion date

01/12/18

Action Plan no 5.

Description

9.4 In progress. According to the 2020 training plan the training should be conducted in April of the current year, but had been postponed due to Covid-19 pandemic. The new date - September 2020.

Planned completion date

01/12/18

Company Action Plan Update

9.1 Accepted. Requirements of orientation trainings with the subjects in question are included in the HR procedure and form of the training.

9.2 Accepted. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The facility has annual training plan that includes Quality and Professional (Employment Functions) trainings. The employees are trained in according to the plan.

9.3 Accepted. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The facility has annual

training plan that includes Quality and Professional (Employment Functions) trainings The supervisors are trained in according to the plan.

Action Plan no 6.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

9.1. Requirements of orientation trainings with the subjects in question are included in the HR procedure and form of the training

9.2. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The facility has annual training plan that includes Quality and Professional (Employment Functions) trainings The employees are trained in according to the plan.

9.4 The policies (Ethical Code of Source company) and Human Resource procedures are issued. The facility has annual training plan that includes Quality and Professional (Employment Functions) trainings The supervisors are trained in according to the plan.

9.5 The first aid training was carried out as planned.

Enclosed is the course certification cards for the 10 participants which took part.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Communication & Worker Involvement (Macro)

Finding Explanation

The worker integration component is missing across the following Employment Functions: Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Termination & Retrenchment and Environmental Protection. Workers are neither systematically integrated nor consulted in the decision-making processes. ER.1, ER.25

Local Law or Code Requirement

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

COMPANY ACTION PLANS

Action Plan no 1.

Description

Action Plan Title

10. Communications and Worker Integration (Recruitment, Hiring and Personnel Development)

Details

IA

1. Appoint HR person responsible to include workers in the decision-making processes, especially as it relates to the following Employment Functions: Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Termination & Retrenchment and Environmental Protection.

2. Develop policies and procedures that facilitate this.

3. Train supervisors and workers in the new policies and procedures.

4. Implement the policies and procedures and monitor accordingly.

SI

1. Update worker handbook with the ways in which workers are included in the decision-making processes as it relates to the

following Employment Functions: Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct & Discipline, Grievance System, Termination & Retrenchment and Environmental Protection.

2. Include training of the same in all new worker orientations.

3. Monitor the implementation of this.

Planned Completion Date

08/25/18

Planned completion date

01/12/18

Action Plan no 2.

Description

Nil

Planned completion date

01/12/18

Company Action Plan Update

Accepted and continuous improvement. The policies (Ethical Code of Source company) and Human Resource procedures are issued. The employees are trained. The facility organizes individual interview with all employees annually.