



COMPANIES: W.L. Gore & Associates GmbH  
COUNTRY: Myanmar  
ASSESSMENT DATE: 10/29/16  
ASSESSOR: FLA China  
PRODUCTS: Apparel  
NUMBER OF WORKERS: 1300

Additional Notes: W.L. Gore ceased sourcing from this factory in March 2021, due to an updated sourcing strategy. At the time of exit, W.L. Gore made up approximately 5% of the factory's total production. Due to the low production volume, there was not perceived risk of retrenchment due to Gore's exit.

## 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. There is no clear procedure and criteria to evaluate the worker during the probation period as the decision is based solely on the supervisor's judgment, which might lead to favoritism. ER.30
2. There is no clear procedure and criteria to promote workers in a fair and transparent way, based exclusively on their job performance. The decision is currently based on the supervisor's judgment. ER.30.1.1
3. The factory has written policies and procedures on Recruitment & Hiring but not on Personnel Development. As such, the factory does not have any procedures on performance reviews. ER.28, ER.29, ER.30
4. The factory does not have any procedures for managing its environmental impact to its surroundings. ER.31
5. The factory does not have written procedures about Health and Safety. ER.31

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.28, ER.29, ER.30, and ER.31)

#### COMPANY ACTION PLANS

##### Action Plan no 1.

##### Description

The evaluation of the company's probationary staff adopts six criteria (result, efficiency, attitude, skill, spirit & conduct). Besides it includes the promotion and transfer of staff. The appraisal staff include several native cadre and one foreign cadre; the appraisal summary is sent to the supervisor department for auditing and signature to ensure fairness.

During the probationary period employees are trained by their line units including the operation of machinery, safe protection mode, operational rules & health & safety of the workers.

Environmental protection - using water resources, green energy, chemical waste classification, LED energy saving bulby, & kitchen waster water to managment center,.

Factory implemented written procedure to Health & Safety.

##### Planned completion date

03/10/18

### FINDING NO.2

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Training (Macro)

#### Finding Explanation

1. The one-hour orientation training provided to new workers does not cover Human Resources (HR) policies or provide adequate information to workers regarding Compensation, Hours of Work, or Grievance System. ER.15.1
2. The factory does not provide specific training to supervisors on Recruitment, Hiring & Personnel Development, Retrenchment & Termination, Industrial Relations, Grievance System, Workplace Conduct, or Environmental Protection. ER.17.2
3. The factory does not provide any ongoing training to employees on Termination & Retrenchment, Industrial Relations, Environmental Protection. ER.1
4. The factory does not provide specific training for the general workforce on grievance system. ER.1
5. The factory does not communicate the grievance system and its updates to the general workforce, as majority of workers are not aware of the grievance system for handling complaints. As a result, workers prefer to go to the union leader to raise their grievance/concerns. ER.16, ER.25
6. The factory does not conduct regular training to all employees regarding environmental protection. ER.1 and ER.17

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15.1, ER.16, ER.17, and ER.25)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

In order for new employees to understand their own rights and obligations, factory arranges 3 hours of education and training (including content of work, use of PPE, salary calculation, prevention of sexual harassment, workplace anti-discrimination, use of fire fighting equipment, care of pregnant workers & environmental protection) and 1 hour of after-class consultation. In each unit we arrange personnel to handle the appeals or employees' rights and interests and there is also a process for formulating grievances. They are also described on the complaint boxes of each unit. HR department announces the results of the improvements to the units. Factory regularly educates all units but in case of any questions relevant personnel is available for support.

#### Planned completion date

03/10/18

## FINDING NO.3

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Review Process (Macro)

#### Finding Explanation

For the following Employment Functions, there is no periodic review of policies and procedures to ensure that they are updated according to local laws and regulations/FLA code requirements: Recruitment & Hiring, Wages & Benefits, Hours of Work, Termination & Retrenchment, Industrial Relations, Workplace Conduct & Disciplinary System, Grievance System, Environmental Protection and Health & Safety 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

Factory regularly sends people to participate in relevant courses and also employs lawyers to provide legal advice and relevant regular updates; HR department is updating the policies accordingly

#### Planned completion date

## FINDING NO.4

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Recruitment, Hiring & Personnel Development

##### Finding Explanation

1. Assessors identified nine workers from a random sample of 109 workers' files who are 15 years old as confirmed through worker interviews. Local law defines persons younger than 16 years old as "children" and allows for employment of workers as young as 14 years old provided certain restrictions are in place at the workplace. These nine workers used fake documents (e.g., ID, household register) when applying for a job with the factory to pass themselves as 16 years old or older. Also, there were no health certificates available for those young workers. The factory policy prohibits hiring of workers younger than 16 years old and the management claims they were not aware that they employed workers considered "children" by local law. CL.1, CL.3, ER.4
2. Since the factory was unaware that they had employed any "child" workers, they have not provided these workers with any of the necessary legal protections; including, task restrictions, hours of work limits, hazardous work protections, or medical assessments.
3. Job descriptions are not prepared for all positions; they are only available for managerial and supervisory positions. ER.1

##### Local Law or Code Requirement

Factories Act (1951), Art. 77, Art 80; FLA Workplace Code (Employment Relationship Benchmark ER.1, ER.4; Child Labor Benchmark CL.1)

##### Recommendations for Immediate Action

1. ensure complete, authentic, and accurate proof of age documents
2. verify proof of age documents with workers during recruitment process
3. train personnel administering recruitment and hiring process
4. review all existing worker personnel files and verify with workers and third parties (parents, local authorities) if there are discrepancies
5. if there are young workers, continue employment, but ensure that their work conditions meet legal requirements.
6. For further reference, please see:
  - FLA Code and Benchmarks, pages 4-6.
  - Factories Act (1951), Art. 77: Aptitude certificates
  - Child Labor in Myanmar's Garment Sector (BSR)

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Because faked ID cards are so similar to reality, factory has sent relevant personnel to participate in the training of courses to avoid similar situation in future. Besides 16-18 years old employees are taken to hospital to do physical health examination and accompanied doctor's certificate.
2. Factory reviewed all existing worker personel files. If the workers used faked ID factory gave them time to provide correct ID card.
3. Protective measures in accordance with local laws were implemented to adjust suitable jobs protecting the physical and psychological development of these young workers

##### Planned completion date

03/10/18

## FINDING NO.5

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Compensation

##### Finding Explanation

1. The workers are compensated as follows: ER.13.1, C.1, C.2, C.3a. During the training period, they are paid 1,800 kyats/day for 3 months (50% of legal minimum wage).b. During the following probationary period, they are paid 2,700 kyats/day for 3 months. (75% of legal minimum wage).c. Upon completion of probation, they will begin to be paid the legal minimum wage of 3,600 kyats/day.In sum,

new workers do not receive the legal minimum wage until completion of the probation period.

2. The factory correctly calculates the termination payout; however, in the case of workers who resign and workers who quit work without notice, they need to get their salary within 3 months of termination; otherwise, this money will be returned to the factory. ER.19, C.1

3. Majority of workers (about 80%) are not aware that they are entitled to 10 days of annual leave per year. The factory prefers to compensate workers for unused leave, so they discourage workers from using their annual leave. If they do not take annual leave, workers are provided the annual leave compensation in March of each fiscal year. C.17 HOW.12, HOW.13

4. Sunday work occurred once per month from May through September 2016, and are paid by cash the next week on Wednesday in the separate payroll records. These records are accurate and show that the correct overtime premium is paid to workers. C.15, C.16

#### Local Law or Code Requirement

Leave and Holiday Act (1951), Art. 4, FLA Workplace Code (Employment Relationship Benchmarks ER.13 and ER.19; Compensation Benchmarks C.1, C.2, C.3, C.15, C.16, and C.17)

#### Recommendations for Immediate Action

1. Ensure workers are paid at least the legal minimum wage (3,600kyats/day) upon hire, regardless of worker employment status.
2. Ensure that resigned workers and workers who quit work without notice are able to get their termination payout without restrictions.
3. Ensure that there is no hidden Sunday work and that there is one set of records for all hours worked.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Factory has made adjustments to the probationary period salary - workers receive a least legal minimum wage upon hire regardless of worker employment status.
2. Except the pay day the salary of the departing staff can come back to receive their salary any time.
3. Workers received training outlining their rights on annual leave; workers decide voluntarily if they would like to work in holiday or not

#### Planned completion date

03/10/18

## FINDING NO.6

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Hours of Work

#### Finding Explanation

1. The factory has missing proof of age documentation, and discrepancies in those age documents that it does possess. There are several workers below the age of 18 at the factory, but the management claims they were not aware that they employed young workers. Thus, the attendance system and records are not able to identify the workers under age 18. HOW.5
2. Sunday working time is recorded separately from the official time record, the workers only sign in their name and time in & out (8:00am & 5:00pm).ER.2, ER.23
3. Sunday work occurred once per month from May through September 2016. The factory has obtained permission for Sunday work from the labor authority. The permission required that the factory provide an alternative day off as a replacement each time; however, the factory has not done this. Due to this Sunday work, workers often did not receive one day off in every seven. HOW.1, HOW.2
4. Work hours often exceeded 60 hours per week, ranging from 64 to 66 hours per week, including Sunday work. HOW.1

#### Local Law or Code Requirement

The Factories Act (1951), Art. 60(1); FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER.23; Hours of Work Benchmarks HOW.1, HOW.2, and HOW.5)

#### Recommendations for Immediate Action

1. Accurately record all work performed, and only keep set of records.
2. Ensure that the workers receive at least 24 consecutive hours of rest in every seven-day period. If workers must work on a rest day, provide an alternative consecutive 24 hours within that same seven-day period.

## COMPANY ACTION PLANS

## Action Plan no 1.

### Description

1. Please see CAP regarding young workers

2./ 3. Create a plan how to ensure that workers receive at least 24 consecutive hours of rest in every seven-day period

The factory could not avoid the Sunday overtime. But factory ensures that workers receive at least 24 hour consecutive of rest on the next day.

4. Create a plan how to ensure overtime will not exceed 60 hours per week.

Planned Completion Date

03/31/18

Planned completion date

03/10/18

## FINDING NO.7

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Industrial Relations

### Finding Explanation

1. The action item that the management and the union representatives agreed upon regarding the strict management style of supervisors in building B, G and F has not yet been implemented. FOA.19

2. Employees are not provided a copy of the Collective Bargaining Agreement (CBA), nor is it posted at the factory. Once an agreement has been concluded between the factory and Union representatives, the updated CBA will be communicated the union members and other workers in the factory. ER.16

3. The management does not provide any office space or other facilities for the union to perform its function. FOA.15

### Local Law or Code Requirement

FLA Workplace Code (Freedom of Association Benchmarks FOA.15 and FOA.19: Employment Relationship Benchmark ER.16)

## COMPANY ACTION PLANS

### Action Plan no 1.

### Description

1. Factory provided training to management avoiding strict management style

2. Company has regular meetings with employers and employees on quarterly basis to provide communication and coordination between the union and company.

Besides factory has posted collective bargaining agreement in the factory.

3. Factory has provided a room for union meetings.

Planned completion date

03/10/18

## FINDING NO.8

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Workplace Conduct & Discipline

### Finding Explanation

1. There are written workplace rules about discipline; however, there were cases where the rules were not fairly implemented. One kitchen worker was dismissed because she had Hepatitis B. Also, two workers (a technician and a cleaner) were terminated for not fulfilling their duties without progressive disciplinary actions taken first. ND.1, ER.27

2. As per the internal rules, the factory imposes monetary fine for disciplinary purposes: If a worker loses their ID badge, then the worker will be fined for 5,000 Kyats, but the badge only costs the factory 200 Kyats to replace. 900 Kyats will be deducted from a worker's production bonus, if s/he is found eating snacks on the production floor. H/A.2

3. Around 10% of the workers interviewed stated that there is verbal abuse and harsh language from line leaders and supervisors (Local

and Chinese), particularly when there is urgent production. H/A.2, H/A.5

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.27; Harassment & Abuse Benchmarks H/A.2 and H/A.5; Nondiscrimination Benchmark ND.1)

#### Recommendations for Immediate Action

1. Ensure disciplinary practices are progressive, including application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination. Disciplinary actions should be documented. (For further reference, please see FLA Code and Benchmarks, ER.27 page 11)
2. Cease the use of monetary fines and penalties as a means to maintain labor discipline, including for poor performance or for violating company rules, regulations, and policies.
3. Ensure that factory by management or supervisor do not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain labor discipline.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Factory improved the disciplinary process using three warning letters and announcement before termination; all disciplinary actions are documented
  2. Factory didn't use the monetary fines. The intention was just that employees take more care of the rationing assets
  3. Factory conducts regular education and training to management staff to strengthen promotion of the mutual respect between Management & employees.
- Planned Completion Date  
11/01/17

Planned completion date  
03/10/18

## FINDING NO.9

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Environmental Protection

#### Finding Explanation

1. Factory has not identified whether on-site operations have negative impact on environment; As a result, the factory has not undertaken any efforts to reduce environmental impact. ER.31, HSE.1
2. Factory is not managing environmental impact of chemicals used on their operations. HSE.1
3. The factory's solid waste collection does not have segregated waste streams. HSE.1
4. These domestic waste containers/bins contained fluorescent lamps, which are hazardous waste. HSE.1
5. The factory's solid waste storage area is not properly secured and protected. HSE.1

#### Local Law or Code Requirement

The Factories Act, 1951, Chapter V Welfare Section 50.1,50.2; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, Employment Relationship Benchmark ER.31)

#### Recommendations for Immediate Action

1. Identify Factory operations with significant impact to environment.
2. Identify and prioritize efforts (chemical, waste, water, energy) to reduce environmental impact

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Factory has classified waste -general rubbish, paper, scrap, chemicals - and disposed properly.
2. Layer of cement was built in the chemical disposal area to avoid chemical flowing in the ground

3. Factory is identifying operations and prioritizing efforts to reduce environmental impact (waste, water, energy)
4. Factory built up a room for chemical waste which segregated from the general waste
5. Waste Fluorescent lamps are put in the separate bin in chemical waste room
6. Chemical wastes are carried out by the government car separately from the general waste

Planned Completion Date

12/08/17

Planned completion date

03/10/18

Company Action Plan Update

1 & 2 already completed

## FINDING NO.10

### IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. There are no emergency lights in the Kitchen. There is also a missing emergency light on QC area of Building G. HSE.5
2. In the Canteen, 1 illuminated exit sign was not plugged to electrical outlet, and 2 exits do not have illuminated exit sign. In Building G, there is a missing illuminated exit sign at the QC area. HSE.5
3. Emergency evacuation directional signs in Building G and H do not lead to the nearest emergency exits. HSE.5
4. Fire extinguisher inspection card showed last inspection was conducted in September 2015. HSE.6
5. At the Printing room, glass panels were observed below 2 mounted Fire extinguishers, while access to 2 Fire Extinguishers was blocked by chair. Access to 1 fire extinguisher at the Chemical room was also blocked. HSE.6
6. In the Diesel storage area, 1 fire extinguisher was found to be overcharged. HSE.6
7. At the back on canteen, 1 LPG tank was placed unattended and not secured. HSE.5
8. Third-party fire risk assessment has not been conducted. HSE.5
9. In Building H 3rd Floor, working space is too crowded due to machine spacing. HSE.5

#### Local Law or Code Requirement

The Factories Act, 1951, Chapter IV Safety Section 40; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.5, HSE.5.1, and HSE.6.1)

#### Recommendations for Immediate Action

1. Review all work-area, and ensure functional emergency lights are available. Set-up an internal mechanism for periodic inspection of all emergency lights.
2. Review all directional signs painted on the floors in the factory, and ensure that they direct workers to the nearest exits.
3. Ensure changes made on the directional signs are reflected on the emergency evacuation plan.
4. Conduct emergency evacuation drill based on the updated directional signs and emergency evacuation plan.
5. Ensure fire extinguishers are periodically inspected, properly maintained, unobstructed and accessible at all times.
6. Ensure fuel tanks are secured, and has proper storage area.
7. Conduct third-party fire risk assessment

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Factory installed the missing emergency lights in the kitchen & QC area; monthly checks to ensure functional emergency lights all times
2. The evacuation arrows on the floor were corrected
3. Barriers have been removed; officials will come to inspect fire equipment annually; fire drills are conducted twice a year to ensure unexpected accidents; factory passed the government agency's assessment

Planned completion date

03/10/18

## FINDING NO.11

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. While there are exhaust fans in the Printing workshop, they're inadequate as there is a strong chemical smell in both locations. HSE.13
2. Disposable plastic and medical gloves are used by some printing operators, including workers who are cleaning the printing templates. There were workers in the recipe area handling chemicals that were not wearing any PPE. Some workers were using active carbon mask only. HSE.7
3. Carbon masks were placed at the Chemical room for use. However, these are not NIOSH approved. HSE.7
4. PPE signs are placed only inside the Chemical Room, but not outside at the entrance to alert those entering the room. HSE.7
5. QC workers were observed to be using disposable plastic gloves when doing stain removal. HSE.7
6. Chemicals stored at the Printing workshop do not have secondary containment. HSE.9
7. Label is missing on plastic container drum. HSE.9
8. Some empty drums were found inside the chemical storage. Also, assessors observed a gallon of liquid chemical placed on top of aluminum powder cans. HSE.1
9. While MSDS is available for all chemicals, there is no guidance posted on Chemical classification and segregation. HSE.9
10. There is no secondary containment on the diesel tank at the Generator room. Also, various cans and containers found inside the generator area. HSE.9
11. In the Diesel storage area, there were 6 cylindrical diesel tanks of 100 gallons per tank, and no individual secondary containment. 1 diesel tank has signs of leakage, and a pan was placed below the tank. There are other metal and plastic drum containers that do not have labels, and no secondary containment. Some of these drums are empty while some are filled with Engine Oil and Thinner. HSE.9
12. In Building B, there were chemical bottles with no labels and MSDS. Chemical adhesive cans were stored inside cabinet without MSDS. There are no spill kits provided in chemical storage rooms, where gasoline is also kept. HSE.9, HSE.10
13. Spill mitigation medium (sand) container is not accessible as it is blocked by empty drum. HSE.1

#### Local Law or Code Requirement

The Factories Act, 1951, Chapter III Health, Section 15, Section 16.1; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.9.1, HSE.9.1.1, HSE.10.1, HSE.13)

#### Recommendations for Immediate Action

1. Ventilation: It is recommended that Factory put in place Engineering Control to ensure there is adequate ventilation in the Printing Workshop. The following should be explored: Install Localized Exhaust Ventilation (LEV) in the Printing area and Recipe room. Ensure that doors and windows are open to provide added ventilation. Remove the window metal enclosure (at the back where exhaust fan is placed) in the recipe room to avoid recirculation of exhaust air.
2. RPE and PPE: Factory should provide adequate RPE and PPE to workers: use chemical resistant gloves as indicated on the MSDS. use NIOSH approved mask based on MSDS details, workers handling/mixing chemicals should be wearing chemical resistant shoes, conduct Air Monitoring Survey.
3. Secondary Containment: Factory should provide secondary containment to Chemicals stored in the Recipe room (Printing Workshop), Diesel storage area, and Generator room. Also, inspect the factory to identify any other chemicals that require secondary containment. Also, inspect all tanks/containers to ensure there is no leakage.
4. Chemical container disposal: Remove all empty chemical containers, and chemicals that are no longer needed. As a best practice, these chemical containers should be returned back to chemical suppliers (for their disposal).
5. Chemical container labelling and PPE signs: All chemical containers, regardless of size/volume stored, should be properly labelled, including local name (if available). Corresponding MSDS should be available as well. PPE signs should be posted both outside and inside specific work-area. For example, generator room, laser cutting room, embroidery room, printing room, chemical room. This is to ensure that workers are constantly informed of the required PPE needed when entering these areas.
6. Chemical Storage: Have a chemical storage plan posted in the Chemical room. This is to ensure that powder and liquid chemicals are segregated, and chemicals are group/stored based on chemical compatibility. Access to spills kits should be free of obstruction at all times.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Factory installed 2 exhaust fans and exhaust pipes to avoid recirculation of exhaust air.
2. Factory provided chemical resistant gloves and gas masks to staff.
3. All chemicals have secondary containment to avoid leakage.
4. PPE signs are placed also outside (next to entrance of chemical room) now.
5. All empty chemical containers and chemicals that are no longer needed were returned to chemical suppliers for adequate disposal.
7. Factory added label on plastic container drum.

8. Chemical storage has been sorted out.
9. MSDS are attached to all areas and chemical drums are marked with chemical contents and warning signs.
- 10./11. Secondary container was created for the diesel tank and generator area was cleared up.
12. Spilling kits were provided in the chemical storage room.
13. Empty iron barrels have been throw away to ensure free access to sand container.

Planned completion date

03/10/18

## FINDING NO.12

### IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. In Building H on the 3rd floor, access to Air pressure tank is obstructed. Warning and Safety sign on air pressure tank is missing. There is also no warning sign in the Compressor Area (ground floor, near Chemical room) HSE.14
2. In Building B, operators are using the laser cutting machine while doors are still open. HSE.14
3. Hot tape machine, ironing machine, snap machines, inspection machines, laser cutting machines and other special machines do not have warning sign and safety instructions. HSE.14
4. Missing pulley guard on sewing machine, and defective eye guards on special machines were observed in Building A. Also, snap machines in Building B are missing safety guards. HSE.14
5. No safety procedure and warning sign are available on generator. HSE.14
6. Electric fans are placed on all Hot Melt machines to minimize and re-direct heat while machine is in use. However, assessors observed strong smell due to material reaction to heat, but workers are not wearing a mask. HSE.13
7. In the kitchen, assessors observed that Exhaust fan not adequate to provide ventilation. HSE.13
8. All electrical panels do not have rubber mats. HSE.13
9. In Building A, 2 electrical panels have dust and dirt accumulation. Also, electrical panel near the Heat Machine is blocked by a table. HSE.13
10. Tubular fluorescent lamps were observed to be in use on the recipe/cleaning area of the Printing Workshop. HSE.13
11. An electrical fuse box at the Generator room was open, and an electrical wire is taped directly to the fuse box. HSE.13
12. At the laser cutting room, electrical wires were not secured and were instead lying on the floor. HSE.13
13. In Building A, there is no local warning sign on Electric Boiler and an electric fan is placed to provide additional cooling to the Electric Boiler. HSE.13
14. In Building B, an electrical extension wire was spliced and connected with repair electrical tape. HSE.13
15. In the Embroidery room, access to an electrical panel was blocked. HSE.13
16. In the laser cutting machine room, blowers installed in the opposite direction were used as exhaust fans. HSE.13

#### Local Law or Code Requirement

The Factories Act, 1951, Chapter IV Safety Section 23; The Factories Act, 1951, Chapter III Health, Section 16.1; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.13 and HSE.14)

#### Recommendations for Immediate Action

1. Inspect all special machines, including generators and compressors in the factory and ensure that there is a warning sign in local language, and safety instructions placed on all special machines.
2. Inspect all machines and ensure that: all machines have belt and pulley guards, functional eye guards are attached to special machines (buttonsew, bartack, etc.), finger guards are installed on snap machines
3. Ensure air pressure tank is secured and clear from any obstructions, safety instruction is posted.
4. Ensure that laser cutting machines' doors are closed while machine is in use. Provide visible reminders (signage, posters, etc.) to operators for safe usage of laser cutting machines.
5. Investigate and explore Engineering Control to improve ventilation on Hot Melt Machine. Provide necessary Respiratory Protective Equipment to operators. The following can be explored: install Localized Exhaust Ventilation (LEV) to remove fumes, re-layout of machines to ensure any source of ventilation (electric fans, etc.) is directed away from workers, and exhaust fans are installed (near the machines)
6. Ensure added ventilation is provided in the Kitchen area.
7. Ensure that electrical panels are: properly maintained and free from dust and dirt, un-obstructed and free access at all times, placed with rubber mats
8. Ensure that explosion proof lights (and not ordinary fluorescent lamps) are installed at the recipe room (Printing Workshop).
9. Ensure that electrical connections and wirings are secured. Cease the practice of taping directly to electrical fuse box. Electrical extension wires should be free from any splices.
10. Ensure that electric boilers have: warning signs and safety procedures attached, properly maintained and has adequate ventilation.
11. Ensure that exhaust fans on the laser cutting room.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. All items which obstructed the road were removed; warning & safety signs were installed on air pressure tank and compressor area.
2. Factory ensures laser cutting machines' doors are closed while machine is in use. Further visible reminders were provided to operators for safe usage of laser cutting machines.
3. Factory has already educated the staff on the safety instructions and put the warning signs to the machines.
4. Factory has inspected all machines and added belt and pulley guards as well as functional eye guards and finger guards to the appropriate machines
5. We provide the protective equipment and put the warning signs outside the door now (13-5).
6. Hot melt machines have electric fans and protective net now.
7. Factory installed more than one exhaust fans now to provide adequate ventilation in kitchen.
- 8./ 9. Electrical panels were cleaned, table removed to ensure free access and rubber mats were provided.
10. Tubular fluorescent lamps were removed and replaced by explosion proof lights.
- 11./12. Electrical connections and wirings are secured now and staff trained accordingly.
13. Factory put the warning signs & instructions on the electric boiler and ensures regular maintenance and inspection.
14. Electrical extension was fixed properly.
15. Factory removed obstruction ensuring free access to electrical panel
16. Factory installed protective net.

#### Planned completion date

03/10/18

## FINDING NO.13

### IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. In Building H, operators using High Frequency Machine were observed to have their backs arched due to chairs lacking back support. HSE.17
2. Some of the workers working in standing position do not have anti-fatigue mats. Also, there were no chairs available for workers working in a standing position, although it is a legal requirement. HSE.17
3. In the Embroidery room, some workers were seen not to be wearing earplugs. Also, in the Laser Cutting Room, some workers were not wearing masks. HSE.8
4. In Building G, some toilets were not working. In Building H, 2 toilet cubicles for female workers and 1 for male workers were not operational. In Building F, 1 toilet cubicle for male workers was not operational. Also, cigarette butts were observed inside male toilets HSE.19 and HSE.20
5. In the Kitchen, a worker was observed doing food preparation (cutting vegetables) on the floor, near a dust-pan. HSE.22
6. Factory does not have a childcare facility, as legally required. HSE.1

#### Local Law or Code Requirement

The Factories Act, 1951, Chapter V Welfare, Section 46.1; The Factories Act, 1951, Chapter III Health, Section 21.1; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.8, HSE.17.1, HSE.19, HSE.20, HSE.22)

#### Recommendations for Immediate Action

1. Provide workers with adjustable chairs with back support. Priority should be workers operating the High Frequency machines.
2. Inspect the different workstations and provide reasonable machine distance and free access.
3. Provide anti-fatigue mats for all workers required to work in a standing position. As per legal requirement, sitting arrangements should be provided as well.
4. Ensure that workers are provided with necessary PPE, and consistently used by workers.
5. Ensure all toilets are functional, clean and well-maintained.
6. Ensure that food preparations are done on table (off the ground), and in a sanitary manner.
7. Provide a childcare facility.

## COMPANY ACTION PLANS

## Action Plan no 1.

### Description

1. Factory has no high frequency machines anymore (moved to another factory due to customer transfer orders).
2. Factory provided anti-fatigue mats and chairs for all workers in a standing position.
3. PPE was provided to the workers and trained them to use it.
4. Factory repaired the defect toilets and is improving maintenance & cleaning.
5. Factory provided a desk for the kitchen workers and trained workers accordingly.
6. Factory is discussing possibilities, costs etc and provide an update soon.

Planned Completion Date

10/02/17

### Planned completion date

03/10/18

### Company Action Plan Update

All issues were solved except providing a childcare facility