# INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: Fast Retailing Co., Ltd. COUNTRY: Pakistan ASSESSMENT DATE: 11/26/16 ASSESSOR: Insync Global PRODUCTS: Apparel NUMBER OF WORKERS: 1200

FAIR LABOR

ASSOCIATION

# **FLA** Comments

This factory produced roughly 20,000 pieces per month, accounting for an approximate average of 10% of the factory's production capacity until FR decided to exit in May 2017. There is no additional production planned for 2017. FR's decision to exit was part of the company's strategic prioritization of production partners that consistently meet quality standards. To that effect, there were some delivery and quality issues prior to FR's decision to exit. There is no risk of retrenchment associated with FR's decision to exit because the factory is able to replace FR production with orders from other brands, including their own brand. For these reasons, FR will not to pursue remediation for the non-compliances identified in this report. There are also currently no other FLA company affiliates sourcing from the factory to pursue remediation.

# 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 has a policy for Recruitment & Hiring, but not for Personnel Development.

2. The factory does not have any procedures for performance reviews.

3. The factory's procedures on Compensation has procedures on wages, but not for other benefits.

4. The factory does not have any written policies and procedures for Termination & Retrenchment, nor does it have methods for calculating final payouts.

5. The factory has policies and procedures for freedom of association and collective bargaining, but not for industrial disputes.

6. The factory's policy on Environmental Protection does not have a statement of management's general support of energy and water efficiency, and a commitment to minimize impacts with respect to air emissions, waste, hazardous materials and other applicable environmental risks. The factory does not have any written procedures for managing environmental impact within the factory and to its surroundings. The Environmental System manual commits to protect environment; however, it does not include any specific procedures.

#### Local Law or Code Requirement

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

# COMPANY ACTION PLANS

### Action Plan no 1.

Description 1. Factory policy inappropriate Details Factory will make policy and procedure for personal development Planned Completion Date 05/31/17

Planned completion date 06/01/17

Action Plan no 2.

<u>Description</u> 2. Inappropriate procedure Details Challenge Apparels will make procedure to evaluate the perofrmance of review. Planned Completion Date 05/31/17

Planned completion date 06/01/17

### Action Plan no 3.

Description 3. Inappropriate procedure Details As there are procedures on Compensation same will be on other benefits Planned Completion Date 06/05/17

Planned completion date 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory included other benefit like Social security, EOBI in to the procedure of compensation

#### Action Plan no 4.

Description 4. Inappropriate policy and procedure Details Company has written policy and procedure on terminations which is updated on 02-05-2017 and calculating the final settlement payments as per Section S.O.12 West Pakistan Industrial and Commercial employment (Standing Orders)Ordinance 1968. Planned Completion Date 06/05/17

Planned completion date 06/01/17

Action Plan no 5.

Description 5. Inadequate of policy and procedure Details The factory will ensure with policies and procedures for freedom of association and collective bargaining, also for industrial disputes. Planned Completion Date 06/30/17

Planned completion date 06/01/17

Action Plan no 6.

<u>Description</u> 6. Inappropriate policy on environmental protection Details Facorty has introduced a Management Review Committee according to Enviornment, Energy Conservation Management system. Facotry has introduced a complete Proedure and Enviornment Management system. Planned Completion Date 06/05/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : The factory is planning to have revision on environment policy

FINDING NO.2

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Training (Macro)

#### Finding Explanation

1. The factory does not provide training on Recruitment, Hiring, or performance review. Policies on human resource policies, Industrial relation and freedom of association are not included in orientation for new workers.

 The factory does not provide training to the relevant supervisors on Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct, Retrenchment, Grievance System, and Environmental Protection. The factory does provide some training to supervisors on disciplinary action, and Termination; however, this training is not documented.
Workers do not receive ongoing training on Industrial Relations, Workplace Conduct & Discipline, Termination & Retrenchment, or Compensation.

4. The factory does not communicate to the general workforce about extraordinary business circumstances or other conditions that impact the workforce. Furthermore the factory does not solicit worker feedback before the creation/implementation of new policies and procedures.

5. Workers from the cutting and stitching department are not included in training on the proper use of dust masks. The factory does not conduct training on the proper lifting techniques.

6. The factory does not provide specific workplace safety training to workers with special responsibilities or to workers with additional responsibilities during an emergency.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.15, ER.16, ER.26, and ER.17)

# COMPANY ACTION PLANS

# Action Plan no 1.

**Description** 

1. Inadequate training to new worker on subject matter

Details

TNA means Training Needs Assesment.

All these policies on Recruitment, Hiring, or performance review. Policies on human resource policies, Industrial relation and freedom of association are included in orientation for new workers. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 2.

Description 2. Inadequate training to supervisor Details Yes the supervisors are also provided trainings on training to the relevant supervisors on Recruitment, Hiring & Personnel Development, Compensation, Hours of Work, Industrial Relations, Workplace Conduct, Retrenchment, Grievance System, and Environmental Protection. Company keeps the attendenace sheet document and Photo evidance as record. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 3.

Description 3. Inadequate training to general workforce Details In TNA we added a schedule for Industrial Relations, Workplace Conduct & Discipline , Termination & Retrenchment or Compensation & Benefits training. Planned Completion Date 05/06/17 Planned completion date 06/01/17

### Action Plan no 4.

Description

4. Inadequate training to general workforce

Details

Factory will communicate to the general workforce about extraordinary business circumstances or other conditions that impact the workforce. Factory will comuniacte about solicit worker feedback before the creation/implementation of new policies and procedures. Planned Completion Date 06/06/17

Planned completion date

06/01/17

### Action Plan no 5.

Description

5. Inapropriate of training to cutting and lifting worker
Details
Factory is conducting training session for all the employees using for weight lift. Mr. Moazzam Ali (Compliance Officer) working as
Saftey Officer is providing technics for proper lifting.
Planned Completion Date
04/28/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory already conducted training on lifting techniques and cutting section.

### Action Plan no 6.

Description 6. Inadequate training on workplace safety training during emergency. Details The factory is providing specific workplace safety training to workers with special responsibilities or to workers with additional responsibilities during an emergency. Planned Completion Date 04/29/17

Planned completion date 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : It was noted that the topics of the workplace safety training was not adequet and details.

# FINDING NO.3

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Review Process (Macro)

### Finding Explanation

1. The factory has not defined a review period for any of the policies and procedures that were created May 2016. The factory's Environmental Protection policy was created on December 5, 2014 and has not been reviewed since.

2. The factory has not defined, in writing, the person(s) responsible for the following Employment Functions: Industrial Relations, Workplace Conduct & Discipline, Grievance System, and Environmental Protection.

Local Law or Code Requirement

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

# COMPANY ACTION PLANS

Action Plan no 1.

Description 1. Setting Revision period on policy and procedure Details Factory is reviewing all the policies and also going to mention the next review date Planned Completion Date 06/18/17

Planned completion date 06/01/17

Action Plan no 2.

Description 2. Setting Revision period on policy and procedure Details Factory is reviewing the policy and will be updated as per policy. Planned Completion Date 06/18/17

Planned completion date 06/01/17

# **FINDING NO.4**

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

The factory has not hire any disabled persons, although it is legally required to have 3% of the total workforce be disabled workers.
Appointment letters (employment contracts) are not issued to all of the workers. Out of 65 workers interviewed, 35 stated that they had not received their appointment letter.

3. The factory has prepared job descriptions for supervisor and manager positions, but not for the general workforce.

4. The factory handbook states that wages will be paid once every two weeks; in practice, however, wages are paid once a month.

#### Local Law or Code Requirement

The Disabled Persons (Employment and Rehabilitation) Ordinance 1981, Section 10, Establishments to employ disabled persons; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, and ER.18)

<u>Recommendations for Immediate Action</u> Provide appointment letters to all workers.

# COMPANY ACTION PLANS

### Action Plan no 1.

Description 1. Recruitment of Disable person Details Factory has hired disable persons and notice for further hiring is also posted. Also mention in the Factory Hiring Procedure Planned Completion Date 06/30/17

Planned completion date 06/01/17

Action Plan no 2.

Description 2. Issuing Appoointment letter timely Details Factory is giving appointment letters to all new workers with in one week after appointment and acknowledgement form after taking signatures is also put in personal files for record and procedure is mentioned in the company policy updated on 16-05-2017. Planned Completion Date 04/01/17

Planned completion date 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory already provided the appointment letter and in addition they keep top page in every personal file

### Action Plan no 3.

<u>Description</u> 3. Job description for general workforce Details Factory is preparing JD for all the designations. Planned Completion Date 05/15/17

Planned completion date 06/01/17

Action Plan no 4.

Description 4. Correction of handbook Details Factory corrected in Handbook that Factory will pay wages on Monthly Basis Planned Completion Date 01/01/17

Planned completion date 06/01/17 Company Action Plan Update 10/25/17 : Factory is in progress to mention in to handbook

# **FINDING NO.5**

# IMMEDIATE ACTION REQUIRED

# **FINDING TYPE:** Compensation

### Finding Explanation

1. Workers with direct bank deposit, about 95% of the workforce, do not sign their pay records to confirm payment.

- 2. Piece rate workers have not been provided with information regarding the pay rate per piece.
- 3. Wage slips are not provided to Security Guards.
- 4. Date of payment is not recorded on payment records and wage slips.

5. Twenty-four workers in the cutting department have been employed as trainees since October 1, 2016. Their monthly wage is PKR 12,000 (USD 114). These workers stated that they were employed in this factory through a government scheme (Punjab Skills Development Fund Industrial Training Program) and their training period is for three months. According to management, the government will pay the wages of these 24 workers after completion of two months employment; however, no written letter from government authorities was available to support the management's assertion.

6. According to management, the factory pays former workers their full and final payment (termination dues) one month after the last day of employment. As per law, termination dues must be paid within two working days from date of termination of employment.

### Local Law or Code Requirement

The Sindh terms of employment Act 2016. (16) Termination of employment; Standing Orders Ordinance 1968. 5. Publication of wage; FLA Workplace Code (Employment Relationship Benchmark ER.2, ER.19, and ER.32; Compensation Benchmarks C.1, C.13, and C.14)

Recommendations for Immediate Action

1. Obtain the signatures of all workers on pay records to acknowledge receipt of wages.

2. Display the rate per piece for piece rated workers on notice boards in related work areas, in the local language.

3. Provide wage slips to security guards.

4. Record the date of payment on payment records and wage slips.

5. Obtain written communication specifying terms of employment from appropriate government authorities for the 24 trainees who are employed in the factory under the Punjab Skills Development Fund Industrial Training Program.

6. Pay termination dues within two days last day of employment.

### COMPANY ACTION PLANS

### Action Plan no 1.

**Description** 

1. Acknowledgement of payment by signature to bank payment sheet Details Factory will take the signatures of workers on salary sheets for the month of July 2017. Planned Completion Date 04/07/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory is in progress take sign from worker from the salary of September 2017.

### Action Plan no 2.

Description 2. Communication towards piece rate worker about their rate Details Facotry is displaying the Piece rate information in each production Line Planned Completion Date 04/01/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory displayed the pay rate for piece in to production floor

### Action Plan no 3.

<u>Description</u> 3. Wage slip for security guard Details Factory is providing the Slips to all the Employees including Security Guard Planned Completion Date 12/12/16

Planned completion date 06/01/17

### Action Plan no 4.

Description 4. Payment date to wage slip Details Factory is started to mention the payment date Planned Completion Date 01/05/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory is mentioning paid date end of the salary sheet and also verified by bank email.

### Action Plan no 5.

Description 5. Written letter from government for contract worker Details Factory has received letter from Punjab Government and it is attached here in separate file. Planned Completion Date 12/13/16

Planned completion date 06/01/17 Company Action Plan Update 10/25/17 : Factory got the letter by december 13,2016.

#### Action Plan no 6.

Description 6. Final settelement payment date Details Factory is paying final payment (termination dues) to former workers within two working days from date of termination of employment. It is implemented and the procedure is also mentioned in the Policy updated on 02-05-2017. Planned Completion Date 01/05/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory cleared the final settelment next day of terimination/resignation.

# **FINDING NO.6**

# IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Hours of Work

#### Finding Explanation

1. Four workers in the finishing department worked on two rest days (September 25, 2016 and October 16, 2016) and were not provided a compensatory rest day, as required by law. Due to this one worker did not receive one rest day in seven.

2. The factory does not display the list of festival holidays on any notice board in the factory, as legally required.

3. The factory does not identify and limit the working hours for pregnant or lactating workers.

#### Local Law or Code Requirement

Factory Act 1934, Section 35: Weekly holiday; Standing Orders Ordinance 1968 (4); FLA Workplace Code (Hours of Work Benchmarks HOW.1, HOW.2, and HOW.5)

#### Recommendations for Immediate Action

Provide compensatory rest days for workers in the finishing department. If work is done on rest days, provide compensatory rest day as required by law. Ensure that all workers receive on rest day in every seven day period.

# COMPANY ACTION PLANS

#### Action Plan no 1.

#### Description

 Provision of Compensatory leave Details
Factory is paying the payment on rest day working and also provides rest within seven working days as per Section 35 of Factories Act, 1934.
Planned Completion Date 12/20/17

Planned completion date

06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory compensate the holiday to December 21,2016.

Action Plan no 2.

Description 2. Displaying the festiv al holiday list Details Now it is displayed in the different places of Factory

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory displayed the holiday list to factory

Action Plan no 3.

Description 3. Working hour for pregnant worker Details The factorywill identify and limit the working hours for pregnant or lactating workers. Electronic system mention in attendance sheet will be mention P. Planned Completion Date 06/30/17

Planned completion date 06/01/17

# FINDING NO.7

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Workplace Conduct & Discipline

#### Finding Explanation

1. Written procedures on Workplace Conduct & Discipline do not provide information on steps to appeal the disciplinary action, or steps to discipline supervisors, manager and workers who engage in any form of harassment and abuse.

- 2. The Workplace Conduct & Discipline procedures do not include a requirement to document verbal warnings.
- 3. Disciplinary records are maintained in a separate file and not in the workers' individual files.
- 4. Disciplinary actions are not witnessed by a third party during imposition.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.2 and ER.27)

# COMPANY ACTION PLANS

### Action Plan no 1.

Description

1. Appropriate procedure for harassment and abuse

Details

Procedure and steps of Appeal against workers, supervisors and Managers are defined in disciplinary action policy. We have implemented a Harassment committee as per Factory Act 2010. According to this Mr. Ikram (Admin Manager) is Chairman for this Committee. Planned Completion Date 02/15/17

<u>Planned completion date</u> 06/01/17 Company Action Plan Update 10/25/17 : Factory included the procedure for sexual harrassment but need to inlcude more about it to respective department concern person.

Action Plan no 2.

Description 2. Procedure of Workplace conduct and discipline Details Procedure and steps to appeal against Disciplinary Action with Verbal Warning has been finalized and Impllimented. Planned Completion Date 02/15/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Workplace Conduct & Discipline procedures do not include a requirement to document verbal warnings.

Action Plan no 3.

<u>Description</u> 3. Maintenanace of disciplinary records Details Disciplinary records will be maintained in the workers' individual files. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 4.

Description 4. Procedure of disciplinary records Details Factory will ensure Disciplinary actions witnessed by a third party during imposition. Planned Completion Date 05/30/17

Planned completion date 06/01/17

# **FINDING NO.8**

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Environmental Protection

### Finding Explanation

1. Waste materials like electrical, paper, polybags, plastic, and glass are not segregated prior to storage.

2. The factory sends its hazardous waste to a third-party waste disposal company, but does not have an authorization letter from the Environmental Protection Agency for using this third-party waste disposal company.

3. The factory does not have MSDSs for Anti-Scalar Triple 9510 or Mineral MW 1000, and the MSDS for silicone oil and white machine oil are only available in English.

4. The factory has not provided a spill response kit in the chemical storage and use area.

5. Except for medical waste, the factory does not label hazardous waste material like florescent tube lights and empty chemical containers. Additionally the factory does not segregate this hazardous waste from non-hazardous waste.

6. Hazard signage is not posted in the waste storage area.

7. Access to the waste storage area is not restricted.

8. The factory has not provided secondary containers for chemicals.

9. The factory stores chemicals in the general storage along with production materials. Bottles with silicone oil were stored next accessories in the stores. Two, 20kg anti-scaler containers are stored near the reverse osmosis water plant, under a table.

10. The factory does not have an alarm notification system for chemical spills and emergencies.

11. The factory does not have a system in place to respond to potential environmental emergencies.

#### Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.4, HSE.5, HSE.9, and HSE.10)

Recommendations for Immediate Action

- 1. Segregate waste like electrical, paper, polybags, plastic and glass prior to storage.
- 2. Provide MSDSs for all chemicals, in the local language, Urdu.
- 3. Provide spill response kits in chemical storage and use areas.
- 4. Label waste material like florescent tube lights, paper waste, plastic waste, and empty chemical containers.
- 5. Post hazard signs on waste stored in the facility.
- 6. Restrict access to waste storage area.
- 7. Provide secondary containers for chemicals.
- 8. Ensure chemicals are stored in a separate area and not along with other materials.

# COMPANY ACTION PLANS

### Action Plan no 1.

Description

1. Segregation of waste as per type Details Factory provided training to handle the waste. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 2.

Description 2. Authorisation of Waste disposal company Details Factory received the authorization letter from third party of waste. ATWM Will provide the authorization letter. Planned Completion Date 01/11/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory received the authorization letter from third party of waste.

Action Plan no 3.

Description 3. MSDS language Details Factory posted the MSDS for Anti Scalar Triple 9510 or Mineral MW 1000. Planned Completion Date 12/21/16

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory posted the MSDS for anti scalar triple 9510 and MW 1000.

Action Plan no 4.

Description 4. Spill response kit Details Factory provided spill response kit in storage of chemical area Planned Completion Date 04/28/17 <u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory is in process to purchase the splil response kit.

### Action Plan no 5.

Description 5. Labelling the hazardous waste Details Factory has established a waste area in Factory with separation system with label of Hazardous and Non Hazardous waste or type wise. Planned Completion Date 06/06/17

Planned completion date 06/01/17

Action Plan no 6.

Description 6. Sign of hazardous waste Details Sign will pe posted in the waste storage area Planned Completion Date 05/29/17

Planned completion date 06/01/17

Action Plan no 7.

Description 7. Restriction on wastage area Details Access to the waste storage area will be restricted, by wall. Planned Completion Date 05/28/17

Planned completion date 06/01/17

Action Plan no 8.

Description 8. Secondary containment Details The factory will provide secondary containers for chemicals. Planned Completion Date 05/15/17

Planned completion date 06/01/17

Action Plan no 9.

Description

9. Chemial keeping is appropriate
Details
Anti Scaler is using for R.O. Plant and factory is storing in separate place in R.O section. Factory is providing training session to employee handling it.
Planned Completion Date
04/29/17

Planned completion date 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory kept the chemical in designated area

Action Plan no 10.

Description 10. Notification for spills and emergency Details The factory will introduce an alarm notification system for chemical spills and emergencies. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 11.

Description 11. System for enviornmental emergecny Details The factory will introduce a system in place to respond to potential environmental emergencies. Planned Completion Date 05/10/17

Planned completion date 06/01/17

# FINDING NO.9

# SUSTAINABLE IMPROVEMENT REQUIRED

# FINDING TYPE: Health & Safety

### Finding Explanation

1. The factory did not provide assessors with the competency certificates of the building engineer and/or company for review.

2. The risk assessment does not address engineering and administrative inspections to reduce or eliminate the risk of structural failure.

3. The factory has not provided any training to designated workers on handling chemicals, except for diesel.

4. The factory does not provide safety information to contractors used for maintenance work. The factory does not have PPE for maintenance contractors, and relies on the contracting company to provide PPE. Additionally the factory does not have a system to ensure that contractors are provided with the correct PPE.

5. The factory has not commissioned a third party to conduct a fire risk assessment.

6. The factory does not track illnesses.

7. The factory's Health & Safety procedures do not include the following: measures to protect the reproductive health of workers through minimizing exposure to workplace hazards; how workers can raise health and safety concerns; protection against retaliation for workers who raise health and safety concerns; steps that should be taken to protect workers if there is an accidental chemical spill, including identifying those who are responsible for cleaning up the spill; identification of the assembly area in case of emergency; workers' duties in case of emergency and roles and responsibilities of emergency personnel; information on electrical certifications, inspections, assessments and reviews (overall electrical system, grounding system, lightning protection system); list of equipment that requires lockout-tagout; material safety data sheets (MSDS) of the chemicals.

### Local Law or Code Requirement

Factories Act 1934 Para 33-Q. (3); FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.31; Nondiscrimination Benchmark ND.8; Health, Safety & Environment Benchmarks HSE.1, HSE.3, HSE.5, HSE.9, and HSE.12)

# COMPANY ACTION PLANS

### Action Plan no 1.

Description 1. Competency certificate of building engineer Details Factory has a PEC number of Building engineer will get the Competency Certificate from Engineer Planned Completion Date 05/30/17

Planned completion date 06/01/17

# Action Plan no 2.

Description 2. In appropriate of risk assessment Details Factory will follow the standard for the Risk assesment as per OHSAS 18001. Planned Completion Date 06/15/17

Planned completion date 06/01/17

Action Plan no 3.

Description 3. Training on chemical Details Factory provided training sessions to the Workers for awareness on chemical handling and it will be part of TNA Planned Completion Date 04/29/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory provided the training but there was no meeting minutes or discussion point.

Action Plan no 4.

Description 4. Management system for Contractor Details There is no Contractor is working in the Fcatory. But according Factory policy if any Contractor will come for work Company will provide PPE training to its worker. Planned Completion Date 05/15/17

Planned completion date 06/01/17

Action Plan no 5.

Description 5. Engagement of 3rd party for risk assessment Details The factory will commissioned a third party to conduct a fire risk assessment. It will be Civil Defense Planned Completion Date 05/10/17

Planned completion date 06/01/17

Action Plan no 6.

Description 6. Tracking of illness Details The factory will work for track illnesses. Planned Completion Date 05/30/17 Planned completion date 06/01/17

Action Plan no 7.

Description 7. Health and Safety procedure Details Factory will rewise the Health & Safety Procedure by add all these aspects. Planned Completion Date 05/06/17

Planned completion date 06/01/17

# FINDING NO.10

# IMMEDIATE ACTION REQUIRED

# FINDING TYPE: Health & Safety

### Finding Explanation

1. The factory has not installed load limit switches on either of the elevators.

- 2. The factory has not posted signage near the elevators restricting their use in case of fire.
- 3. Loading capacity and intent of use (passenger or cargo) is not marked near the elevators.
- 4. Chemical containers are labeled for their contents, but not for their hazards.

5. Ten percent (10%) of workers from the cutting department and 10% of workers from the stitching department do not use the dust masks provided by the factory.

6. The factory does not provide lifting belts to the relevant workers.

7. The factory provides workers in the ironing department with anti-fatigue mats; however, 60 to 70 workers with standing jobs in the cutting and finishing departments are not provided with anti-fatigue mats. Adjustable chairs with backrests are not provided to workers with sitting jobs.

8. The factory has not marked traffic lanes or walking paths inside the premises.

9. The factory has not installed convex mirrors at blind ends, reflectors, or speed breakers to ensure safe driving practices inside the factory premises.

- 10. Two electrical generators used in the factory are not secured on both sides, as required by law.
- 11. The factory has not established a lockout-tagout procedure; however, "work in progress" signs are used for maintenance work.

12. The factory does not provide the proper safety equipment (harnesses) electricians who are working at heights on electric conduits.

- 13. The factory has not installed safety barriers or fences on two overhead water tanks.
- 14. The factory has not provided half of the electricians with safety shoes.
- 15. There is no health screening process for child care attendants prior to hiring.

16. There is no soap or towels in the hand washing areas of either of the two canteens or in the washrooms of the stitching sections located on the first and second floors of Block 2.

- 17. There is no "Danger" sign on two electric panels in the men's' canteen.
- 18. Male and female toilets are labeled in English, but not in the local language (Urdu).

19. First aid supplies, like hand bandages, arm bandages, triangular bandages and eye drops, are missing in seven of the 22 first aid kits located among the canteen, stitching, finishing, and packing sections. The factory has not provided a first aid kit in the sampling room. 20. One fire extinguisher, in the accessories storage area, is blocked by a wheelchair.

- 21. One of the two emergency lights in the accessories storage area does not function.
- 22. The factory does not provide cups for drinking water at three drinking water stations in the stitching and finishing sections.

### Local Law or Code Requirement

Factories Act 1934 Para 33-A; Punjab factories rules 1978 Rule 41, Rule 29, Rule 96, and Rule 49; Factories Act 1934 Para 19; Factories Act 1934 Para 33-D; Electricity Rules 1937 Rule 57; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.5, HSE.6, HSE.8, HSE.9, HSE.14, HSE.17, HSE.18, HSE.20, HSE.23, and HSE.27)

### Recommendations for Immediate Action

1. Install load limit switches on both of the elevators.

- 2. Post signage, in local language, restricting the use of the elevators in case of fire.
- 3. Post the load capacity and intent of use (passenger or cargo) near lifts.
- 4. Label chemical containers for hazards.
- 5. Train the relevant workers on the use of dust masks. Regularly monitor for compliance.
- 6. Mark traffic lanes and walk paths inside the factory premises.

7. Install convex mirrors at blind ends, reflectors, and speed breaker to ensure safe driving practices inside the factory premises.

8. Provide grounding arrangements for two electrical generators on both sides, as required by law.

9. Establish and implement a lockout-tagout procedure for use during maintenance work.

10. Provide safety belts for electricians who work at heights on electric channels.

11. Install safety barriers or fences on the two overhead water tanks to prevent falls.

12. Provide safety shoes for three out of six electricians.

13. Screen child care attendants prior to hiring.

14. Provide soap and towels in hand washing areas for both the male and female canteens and in male and female washrooms in the stitching sections located on the first and second floors of Block 2.

15. Post "Danger" signs, in the local language, on the two electric panels in the male canteen.

16. Label the male and female toilets in the local language, Urdu.

17. Sufficiently stock the first aid kits located in the canteen, stitching, finishing, and packing sections. Provide a first aid kit for the sampling room.

18. Ensure all fire extinguishers remain unobstructed at all times.

19. Repair the malfunctioning emergency light in the accessories storage area.

20. Provide cups for drinking water at the three drinking water stations in the stitching and finishing sections.

### COMPANY ACTION PLANS

### Action Plan no 1.

Description 1. Load limit to elevators Details The factory will instal load limit switches on either of the elevators. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 2.

Description 2. Posting the safety sign Details The factory will post signage near the elevators restricting their use in case of fire. Planned Completion Date 05/15/17

Planned completion date 06/01/17

Action Plan no 3.

<u>Description</u> 3. Marking the load capacity Details Factory will mark the Capacity on the cargo. Planned Completion Date 05/05/17

Planned completion date 06/01/17

Action Plan no 4.

Description 4. Labelling container with hazard Details Chemical containers will be labeled for their contents, including their hazards. Planned Completion Date 05/06/17 Planned completion date 06/01/17

Action Plan no 5.

Description 5. PPE to worker Details Factory will provide awareness session to use PPE and will ensure in daily compliance report Planned Completion Date 05/05/17

Planned completion date 06/01/17

Action Plan no 6.

Description 6. PPE to worker Details The factory has provided the Lifting belt to the workers working in the store for Loading & Unloading. Planned Completion Date 05/06/17

Planned completion date 06/01/17

Action Plan no 7.

Description 7. Anti Fatigue mat, backrest chair to general worker Details It is in procees and hope will be completed till target date. But Factory has provided anti-fatigue mats to press workers Planned Completion Date 08/31/17

Planned completion date 06/01/17

Action Plan no 8.

Description 11. Maintain lockout procedure Details Facroy will establish the Lockout and tagout system and will also provide the awareness training Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 9.

Description 13. Installment of safety barrier Details The factory will instal safety barriers or fences on two overhead water tanks. Planned Completion Date 05/30/17

Planned completion date 06/01/17

Action Plan no 10.

Description

15. Heath screening process is missing Details Factory will ensure behealth screening process for child care attendants prior to hiring. Planned Completion Date 05/10/17

Planned completion date 06/01/17

Action Plan no 11.

Description 19. Inadequate number of first aid kits Details Factory is providing medicines to first aid boxes. Factory has a master first aid box with complete kit as per requirement. Planned Completion Date 04/21/17

Planned completion date 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : It was noted that except the female canteen area factory provided first aid box.

Action Plan no 12.

Description 8. Marking the traffic lane in premises Details Factory has marked traffic lane walking paths inside the Premises Planned Completion Date 12/20/16

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory marked the traffic lanes inside the factory premises

Action Plan no 13.

Description 9. Install Convex mirror Details Factory has installed the Convex Mirror at blind ends as a reflector. Planned Completion Date 01/05/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory installed the convex mirror.

Action Plan no 14.

Description 10. Fencing the generator Details Factory has installed the earth connection as per required by law. Planned Completion Date 12/19/16

Planned completion date 06/01/17 Company Action Plan Update 10/25/17 : Factory secured the generator by earth connection

### Action Plan no 15.

Description 12. PPE to electrician Details The factory has provided the proper safety belt to the Electricians to work at the Height. Planned Completion Date 12/21/16

Planned completion date 06/01/17 Company Action Plan Update 10/25/17 : Factory provided the safety belt with safety chair

#### Action Plan no 16.

Description 14. Installment of safety shoes Details Factory has provided the Safety Shoes to all the Electricians fro Safety Planned Completion Date 12/21/16

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory provided the safety shoes to the electrician.

### Action Plan no 17.

Description 16. Soap and Towel is missing Details Factory provided the Soap and towel on each washroom area and will ensure through daily compliance report Planned Completion Date 04/21/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : It was noted that soap and towels noted in canteens and washroom area

### Action Plan no 18.

Description 17. Danger sign is missing Details Factory provided "Danger" sign on two electric panels in the men's' canteen. Planned Completion Date 04/22/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory marked the danger sign on electric panel board

Action Plan no 19.

Description 18. Toilet marking in local language Details Male and female toilets labeled inthe local language (Urdu). Planned Completion Date 04/21/17

#### Planned completion date

06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory mentioned to Male and female toilet labeled in Urdu

### Action Plan no 20.

Description 20. Fire equipment blockage Details Factory ensured that all the Fire Extinguishers and passages are free from any obstacle through Daily Compliance checklist Planned Completion Date 04/25/17

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory make the passage in accessories area without blockage

Action Plan no 21.

Description 21. Emergency light to accessories store Details Factory has replaced the non Functional Emergency Light and started to check the Emergency light weekly with report record Planned Completion Date 12/06/16

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Emergency light in the storage area found functional

Action Plan no 22.

Description 22. Provision of CUP for drinking water Details Factory Has started to provide the Cup for drinking water Planned Completion Date 12/06/16

<u>Planned completion date</u> 06/01/17 <u>Company Action Plan Update</u> 10/25/17 : Factory provided the cups for drinking water in all section.