



FAIR LABOR  
ASSOCIATION®

## INDEPENDENT EXTERNAL ASSESSMENT REPORT



### Verification Assessment

COMPANIES: Yee Tung Garment Co., Ltd  
COUNTRY: Jordan  
ASSESSMENT DATE: 09/30/18  
ASSESSOR: FLA EMEA  
PRODUCTS: Apparel  
NUMBER OF WORKERS: 3000

## 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.

FLA Code Element	Number of Violations
Compensation	2
Hours of Work	3
Employment Relationship	12
Health, Safety, and Environment	1
Forced Labor	1
Nondiscrimination	2

## Previous Report Findings and Verification Results

### PREVIOUS FINDING NO.1

#### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Compensation

##### Finding Explanation

The factory does not have any childcare facilities, although local law requires factories to provide childcare facilities in workplaces that employ at least 20 married female workers. At the time of the assessment, there were more than 20 married female workers working at the factory; 73% of the workers are female with a total of 2679 women at the factory.

##### Local Law or Code Requirement

Jordanian Labour Law No: 8, 1996 Article 72; FLA Workplace Code (Nondiscrimination Benchmark ND.8.1)

#### VERIFICATION RESULT

##### Finding Status

Not Remediated

##### Remediation Details

1. Finding Status (Not Remediated)

Explanation: The factory reached an agreement with the Industrial Zone Authority to establish a central childcare facility. However, the agreement has not yet been put into action. [C.1, ND.1, ND.8]

Root Causes: The Industrial Zone Authority delayed the establishment of the childcare facility due to some legal issues.

##### Local Law or Code Requirement

Jordanian Labour Law No. 8, 1996, Article 72; FLA Workplace Code (Compensation Benchmark C.1; Non-Discrimination Benchmarks ND.1 and ND.8)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

For this issue, the factory signed an agreement with General Trade Union of Workers in Textile, Garment & Clothing Industries. The agreement is to allow CMJ to pay JD25 per mother until we build the child care. And, Jordan MOL has accepted the agreement.

Please see attachment: #1.1 Child Care Agreement

Planned Completion: 12/31/2020

Planned completion date  
07/26/17

## PREVIOUS FINDING NO.2

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Training (Macro)

#### Finding Explanation

1. There is an employee handbook (in local languages) provided to the workers during the recruitment process which includes Recruitment & Hiring, Termination, Hours of Work, Compensation and leaves, factory rules, Grievance System, and Health, Safety & Environment. This handbook, however, was written in May 2015 and only distributed to the workers who have been hired since this date. 2. The factory provides ongoing training to the workers on factory policy and procedures; however, there is no training planned that is focused on refreshing policies and procedures, catered towards each nationality group. As there are multiple nationalities in the facility, the training must be available in all the workers' languages. Although the assessor had access to the content headings for the trainings, and some signatures on the training records of workers, the factory does not have a system to ensure all workers receive ongoing training. In general, the factory does not have a system to ensure all workers receive ongoing training. 3. The factory does not provide specific training to supervisors on any of the Employment Functions.

#### Local Law or Code Requirement

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

## VERIFICATION RESULT

#### Finding Status

Remediated

#### Remediation Details

##### 1. Finding Status (Remediated)

Explanation: The employee handbook is regularly reviewed and updated (the last update was in March 2018) and distributed to all workers.

##### 2. Finding Status (Remediated)

Explanation: The factory provides ongoing training to workers on all Employment Functions annually. The last training session was conducted in October 2017. According to the factory's documents, migrant workers receive training through translators and the training evaluation forms are in their language(s).

##### 3. Finding Status (Remediated)

Explanation: The factory provides supervisors with periodic training that covers the following Employment Functions: Compensation; Recruitment, Hiring, and Personnel development; Termination; Grievance System; Workplace Conduct and Discipline; Industrial Relations. The training also covers the factory's Code of Conduct and Zero Tolerance Policy on harassment, abuse and forced labor. In addition, the factory is in collaboration with Better Work, and supervisors received training from a Better Work representative in April 2018.

### IMMEDIATE ACTION REQUIRED

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

##### Finding Explanation

1. Out of a total workforce of 3,670, there are 2,811 migrant workers. The factory uses recruitment agencies to find these migrant workers. The recruitment agencies, which are located in workers' home countries, require commission fees from the workers. According to worker interviews, Sinhala workers paid between USD 150 and USD 350 and Bengali workers paid USD 200 to recruitment agencies. There are also migrant workers from other countries. It is also stated in the agreement between agencies and the factory that the recruitment agencies may require a commission fee from the workers. 2. All of the recruitment agencies require pregnancy tests from female workers (urine and blood tests) and HIV tests from male workers, posing a potential risk for discrimination in the recruitment process. Female workers are also verbally warned to not get pregnant during the work agreement in their home countries. 3. All workers are registered for social security. However, if the worker is hired after the fifteenth day of the month, the registration is not made until the first day of the next month. Therefore, for some workers there may be a delay of up to 15 days for their social security registration. 4. One Bengali worker was working in the factory although her employment contract expired on 8/8/2016. Additionally, her work permit expired on 10/23/2016; this was also the same day that the factory terminated the worker legally. However, the worker was still working during the assessment on 10/27/2016. The factory declared they did not want to renew her employment contract and that she will be returning to her home country at the end of the month. 5. The number of disabled workers (0.5% of the total workforce) is below the local legal requirement which states that the workforce should be comprised of at least 4% of disabled workers. There are currently 12 disabled workers in the facility; however, the factory needs to hire 135 more workers to be in compliance with the local law, for a total of 147 disabled workers. 6. The factory does not provide a copy of the employment contract to the local Jordanian workers. 7. The job application forms for local workers require information on marital status and number of children which might lead to discriminatory hiring practices. 8. Although the performance evaluation procedures state that the evaluation records should be kept in each personnel file, there is no system for performance review or evaluation. Performance review is done through supervisor observation only. 9. The factory has procedures on the hiring process however, there are no policies on hiring. 10. The factory has procedures on Recruitment & Hiring but not on Personnel Development. Moreover, the Recruitment & Hiring procedures do not include guidance on special categories of workers. 11. There are no written job descriptions for any positions.

##### Local Law or Code Requirement

Jordanian Labour Law No: 8, 1996 Articles 2, 4, 6, 12 and 72; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.5, ER.6, ER.14, ER.18, ER.28, ER.29 and ER.30; Nondiscrimination Benchmarks ND.1, ND.2, ND.3, ND.5, ND.6, ND.7, and ND.10; Forced Labor Benchmark F.7)

##### Recommendations for Immediate Action

1. Ensure that the recruitment agencies do not require recruitment fees from workers. If commission fee is unavoidable, the factory should compensate the fees. 2. Cease unnecessary medical testing, such as pregnancy and HIV tests during recruitment. 3. Register all workers with social security during the hiring process, and ensure that the workers are registered before they start working in the factory. 4. Ensure that migrant workers with an expired work permit do not work in the factory. Renew work permit and employment contract if the factory wants the workers to continue working. Additionally, ensure that the workers who are terminated legally do not work at the factory after their termination and without a new contract. The factory should provide all benefits, such as, dormitory and meals, until worker leaves to return to their home country. 5. Hire 135 more disabled workers to be in accordance with the law. 6. Provide a copy of the employment contract to the local Jordanian workers, ensure that this is implemented. 7. Remove questions regarding marital status and number of children on job applications to minimize the risk of discrimination.

### VERIFICATION RESULT

##### Finding Status

Not Remediated

##### Remediation Details

1. Finding Status (Partially Remediated)

Explanation: There is a clause in the factory's agreement with the recruitment agencies it uses regarding the factory's responsibility for covering all agency fees and travel costs. However, according to worker interviews, the Bengali migrant workers pay a USD 200 recruitment fee in their home country. [ER.5, F.7]

Root Causes: Assessors were unable to verify the reason for the fee. It could be the cost of travel documents (i.e. a passport) or an introduction fee charged by an unofficial middle man. The workers interviewed were not aware of the reason for the payment.

## 2. Finding Status (Partially Remediated)

Explanation: None of the workers interviewed reported taking a pregnancy test, but urine tests are still required by the Sri Lankan government before allowing female migrant workers to leave Sri Lanka. Additionally, blood tests and x-rays are required for all Bengali migrant workers. In addition, upon arriving in Jordan all migrant workers are tested for HIV test among other blood tests in order to receive a work permit. [ND.10]

Root Causes: The tests are required legally by migrant workers' home countries and by Jordanian authorities.

## 3. Finding Status (Not Remediated)

Explanation: According to management interviews and a documentation review, workers are still not registered for social security in a timely manner. Workers who are hired after the fifteenth day of the month are not registered for social security until the subsequent month. [ER.22]

Root Causes: The social security system only allows the registration of workers on the first and the fifteenth day of each month due to the Social Insurance Department's workload.

## 4. Finding Status (Remediated)

Explanation: According to the 52 interviewed workers and the 54 personnel files reviewed by assessors, all of the migrant workers in the factory have valid employment contracts and work permits.

## 5. Finding Status (Remediated)

Explanation: The factory employs 25 disabled local workers, which represents 5.58% of the factory's local workers. The target was reevaluated to only include a percentage of local workers according to Better Work's recommendations since the factory does not have access to disabled workers in foreign countries.

## 6. Finding Status (Remediated)

Explanation: All workers interviewed including local workers have a copy of their contract in their own language.

## 7. Finding Status (Not Remediated)

Explanation: The factory's job application forms for local workers require information on applicants' marital status and number of children which might lead to discriminatory Hiring practices. [ER.3, ND.2]

Root Causes: Management does not consider the marital status and number of children questions to be discriminatory.

## 8. Finding Status (Partially Remediated)

Explanation: Although the factory has created evaluation procedures and records, performance reviews are still based on supervisors' observations. Supervisors assign scores for each of the performance review categories (attendance, skills, job knowledge, quality of work, team work, general conduct, and discipline) based on their observations. The scores are not linked to quantitative measures such as the factory's efficiency records. [ER.29]

Root Causes: Management does not consider the monthly efficiency records part of the performance evaluation system. They feel that the supervisors' observations take into account the workers' productivity according to the monthly efficiency records.

## 9. Finding Status (Remediated)

Explanation: The factory's Hiring policy was added to the Hiring procedures document during the assessment. [ER.1, ER.7]

## 10. Finding Status (Remediated)

Explanation: The factory established Personnel Development procedures and updated the Recruitment & Hiring procedures to include guidance on female and pregnant workers. The factory's Hiring procedures indicate that the factory does not hire young workers. During the assessment, the Recruitment & Hiring procedures were further updated to include a commitment to follow legal requirement and FLA benchmarks regarding disabled, young, breastfeeding, and pregnant workers.

## 11. Finding Status (Not Remediated)

Explanation: The factory still does not have written job descriptions for any positions. [ER.1]

Root Causes:

1. The factory does not have well established management system.
2. The relevant personnel are not aware of the FLA requirements.

## Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.3, ER.5, ER.7, ER.22, and ER.29; Non- Discrimination Benchmarks ND.2 and ND.10; Forced Labor Benchmark F.7)

## Recommendations for Immediate Action

1. Ensure that the recruitment agencies do not require recruitment fees from workers. The factory should pay any unavoidable fees.
2. Stop conducting unnecessary medical testing, such as pregnancy and HIV tests, during Recruitment.
3. Register all workers for social security during the Hiring process and ensure that the workers are registered before they start working in the factory.
4. Remove questions regarding marital status and number of children from the job applications to minimize the risk of discrimination.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. There is an agreement between the factory and recruitment agencies to clearly mention that the workers should not pay any extra money beyond the administration fees that is different from nationality to nationality.

For workers (Admin fees)

Passport fee: Ave USD \$58, max. \$158

Local transportation: Avg \$27, max. 55

Medical test: Avg. \$30 max. \$60

Total admin charge: avg \$170, Max. 280

If there is extra charges found from workers with official receipt, CMJ will deduct the amount from the payment to agency. The factory will also conduct due diligence interview with our workers to verify any fees paid by the workers in their home countries.

11/27/2019: The factory got declaration letter from recruitment agencies of Bangladesh, Myanmar, and Madagascar in Oct 2019. The declaration letter includes that no recruitment fees will be charged by workers, except the administration charges and other mandated charges approved by local authorities.

The factory would do survey for new workers when they arrive, If workers could showed us objective evidence to prove whoever (e.g. direct agent/sub-agent) charged them unreasonably, we reserve the rights to deduct this amount by charging back to our labor agency.

The next batch of new workers are from Myanmar and Bangladesh. And the earliest month of arrival to the factory will be around Dec 2019. The factory would conduct recruitment fee survey for them and keep following.

See attached:

1. (Bangladesh)Declaration Letter

1. (Burmese)Declaration Letter

1. (Madagascar)Declaration Letter

12/31/2019: 21 and 46 Burmese workers have arrived CMJ at 12/14/2019 and 12/15/2019 respectively. And we have conducted the survey including recruitment fee and pregnancy test issue. From the interview, all reported no pregnancy test, and also no recruitment fee, so this complies with our promise that our workers didn't pay any recruitment fee during the hiring process. For other charges they reported such as passport and local traveling, this is not the recruitment fee so it's out of the reimbursement. Factory will keep doing survey for the migrant workers afterwards.

Attached:

3.1 Employee Interview Survey 20191214 (2 samples)

3.1 Employee Interview Survey 20191215 (2 samples)

3.1 Employee Interview Survey Record 20191214

3.1 Employee Interview Survey Record 20191215

3.1 New Burmese Worker Name List 20191214

### 3.1 New Burmese Worker Name List 20191215

### 3.1 Workers Survey Form (CMJ 20191215)

2. The factory has reached an agreement and signed social responsibility commitment with the recruitment agencies of each nationality to prevent any kind of discrimination. And pregnancy test and HIV test is also not allowed to conduct, except the test which is required by government. The factory will keep the current practice and fulfill the local laws.

12/31/2019: In October 2019, the factory received declaration letter from labor agent in Bangladesh, Myanmar, Sri Lanka and Madagascar. The letter stated that labor agency would not require or force workers to take pregnancy tests or HIV tests. And the factory asked the labor agency to send the workers' medical test reports for verification. The factory would do survey for new workers when they arrived at factory. The factory

reserves the right to hold the labor agency if it finds out that pregnancy tests and HIV tests have been carried out in their country and the worker can prove it.

21 and 46 Burmese workers have arrived CMJ at 12/14/2019 and 12/15/2019 respectively. And we have conducted the survey including HIV test and pregnancy test issue. From the interview, all reported no pregnancy test, and HIV test. Factory will keep doing survey for the migrant workers afterwards.

See attached:

### 3.2 Declaration Letter (Bangladesh)

### 3.2 Declaration Letter (Burmese)

### 3.2 Declaration Letter (Madagascar)

### 3.2 Declaration Letter (Sri Lanka)

### 3.2 Medical Test Report 27112019(Burmese)

3. Based on the law, the social security cooperation is in charge for each worker during the first join date in his/her employment. The registration date is set by the government. Therefore this's country issue which is out of the factory's capability to handle.

7. The job application form for local workers has deleted the information about marital status of the applicant and number of children.

Please see the Attachment: #3.7 Local worker job application 2019

8. The factory has developed a policy to illustrate the items that need to be considered during performance evaluation. And the factory will provide a detailed quantitative standard for each item to make the evaluation more fair and reasonable.

Please see the attachment:

### #3.8 CMJ Employee of the month program policy

### #3.8 CMJ Top Employee List 032019

12/31/2019: The factory has revised the workers' evaluation form which provides a detailed quantitative standard for each item to make the evaluation be more fair and reasonable.

See attached :

3.8 Employee performance review form 201912

11. The factory has created job description for the production department and the health and safety department. The factory will create job description for other departments progressively.

Please see the attachment: #3.11 H&S Engineer Job Description

#3.11 Production Dept Job Description

12/31/2019: Completed. The factory has updated JD for all positions.

See attached:

3.11 CMJ Job Description(Workshop & Main Office)

1. Done

2. In progress

3. In progress

7. Done

8. Done

11. Done

Planned completion date

07/26/17

Company Action Plan Update

06/22/2020 update:

2. The last two groups of new Burmese workers arrived at the factory on 31 December 2019 and 19 January 2020 respectively. And we have conducted the survey including HIV test and pregnancy test issue. From the interview, all reported no pregnancy test, and HIV test. Factory will keep doing survey for the migrant workers afterwards.

See attached:



## PREVIOUS FINDING NO.4

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Compensation

##### Finding Explanation

1. The factory pays migrant workers less than local workers. Local workers are paid JOD 190 (USD 268) while migrant workers are paid JOD 110 (USD 155), after the deduction of dormitory costs and meals. Although this practice is legal and is within minimum wage amounts, it is not in compliance with FLA Workplace Code. 2. There are inconsistencies between bonus sheets and attendance sheets. Out of ten sampled workers, the bonus sheets showed that two Nepalese workers worked on two rest days, September 2 and 16, 2016, and were paid with bonuses; however, according to the attendance sheet, they did not work on those days nor paid for overtime with the extra 50% premiums. 3. All 50 workers interviewed were asked about their last salary; 35 reported different amounts. All were asked if they had the pay slips with them; all but three workers said that they had disposed of the pay slips. The three workers who had not disposed their pay slips were asked by assessors to bring in their pay slips on the next day of the assessment; however, the next day, all of them said that they could not find their pay slips.

##### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 52 and 53; FLA Workplace Code (Employment Relationship Benchmarks Er.11.2.1 and ER.23; Compensation Benchmarks C.1, C.2, C.5, and C.16; Nondiscrimination Benchmarks ND.1 and ND.3)

##### Recommendations for Immediate Action

1. Pay all workers in the factory the same basic salary, as determined after deductions. 2. Record all working hours in the attendance sheet. 3. Pay workers all overtime worked at the correct overtime wage rates. 4. Ensure that the workers are paid accurately.

### VERIFICATION RESULT

##### Finding Status

Partially Remediated

##### Remediation Details

###### 1. Finding Status (Partially Remediated)

Explanation: According to the Collective Bargaining Agreement (CBA), all workers receiving the same basic wage and total compensation, but the way this is calculated varies considerable. The factory follows the regulations mandated in the CBA to provide housing and food to migrant workers equal to cash paid to local workers:

###### a. For local workers:

i. Basic Salary: 110JD

ii. Inflation Support: 80JD

iii. Bonus (Cash or in kind according to company): 30

###### b. For Migrant workers:

i. Basic Salary: 110JD

ii. Inflation Support: 15JD

iii. Housing & Food (in kind benefit): 95JD

###### 2. Finding Status (Remediated)

Explanation: All of the sampled payroll, attendance, and bonus records from the months of December 2017, and April, June, July, August, and September 2018 were consistent and accurate.

###### 3. Finding Status (Remediated)

Explanation: All of the sampled payroll, attendance, and bonus records from the months of December 2017, and April, June, July, August, and September 2018 were consistent and accurate. There were no issues with workers pay slips.

### COMPANY ACTION PLANS

Action Plan no 1.

### Description

1. The CBA is approved by union, Ggate and deposited in the Ministry of labor. We are paying in cash Jd125 basic salary and in kind Jd 95 based on the CBA agreement with total of minimum wage Jd220 to migrant workers. The overtime and social security calculation is based on the minimum wage of Jd 220 for all

nationalities (Migrants and local). We treat equally for migrant and local workers and pay the same minimum wage amount, which follows the CBA.

So factory will keep practice at current stage.

12/31/2019: Based on new CBA (valid from 11/01/2019-10/31/2022), in addition to the previous 3 salary elements (basic salary, inflation support, bonus/in kind benefit), one more element is added for both of local and migrant workers:

Any worker who has worked for more than one year and whose base salary is less than 300JD shall be increased by 5JD. Overtime, paid leave, and social insurance are also calculated on this basis.

Planned Completion: 12/31/2020

Planned completion date  
07/26/17

## PREVIOUS FINDING NO.5

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Compensation

##### Finding Explanation

1. The factory pays bonuses separately from the actual wages. The actual wages are made up of the total amounts of workers' gross earnings, including salaries and overtime, while the efficiency bonuses are separate and paid two weeks later and is not included in the social insurance premiums. 2. The factory calculates the efficiency bonus on a base of 12 working hours instead of eight which results in a lower bonus for workers.

##### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Article 46; FLA Workplace Code (Employment Relationship Benchmark ER.18; Compensation Benchmarks C.1, C.5, C.15, and C.16)

##### Recommendations for Immediate Action

1. Ensure that bonuses are included in the calculations for social insurance premiums. 2. Pay bonuses within seven days with salaries according to required local law. 3. Calculate bonuses based on eight daily hours instead of 12 hours.

### VERIFICATION RESULT

##### Finding Status

Not Remediated

##### Remediation Details

1. Finding Status (Partially Remediated)

Explanation: The factory pays workers' bonuses within the first seven days of the subsequent month in accordance with Jordanian labor law. However, the bonuses are still paid separately from the workers' actual wages and are not included in the official payroll documents. This affects the calculation of social insurance and tax deductions. [ER.2, C.5, C.14, C.15]

Root Causes: The factory has a complicated bonus system that, according to management, is hard to include within the payroll system.

2. Finding Status (Not Remediated)

Explanation: The factory calculates workers' bonuses on a daily basis according to the total number of hours worked (including normal working hours and overtime hours). For example, if a worker works ten hours in a day, that day's bonus will be based on ten hours and if the next day he or she works for 12 hours, that day's bonus will be based on 12 hours of work, etc. At the end of the month, the daily bonuses are added up to reach a monthly bonus. [ER.22, C.5]

Root Causes:

1. The bonus is not legally required and regulated.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER.22; Compensation Benchmarks C.1, C.5, C.14, and C.15)

#### Recommendations for Immediate Action

1. Calculate bonuses based on eight hours of work per day instead of regular plus overtime hours.
2. Pay bonuses together with workers' wages. Include bonuses in the payroll documents.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. It's involved the production to provide the monthly efficiency reports and take times to calculate the bonus. However, factory will try to improvement its efficiency bonus system. Any variable wages don't include in the social security according to their policy, and we pay the social security insurance based on worker min wage including in kind food allowances.
2. The target for the efficiency bonus is always 8 hours based on regular working hours, however, If the worker worked only 1 hour, then we will pro-rate the target for 1 hour only so that the eff. is apple to apple theory.

In this case, the factory will keep remain the current practice.

#### Action Plan Status:

1. In progress
2. In progress

#### Planned Completion:

1. 12/31/2020
2. 12/31/2020

Planned completion date  
07/26/17

## PREVIOUS FINDING NO.6

## IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

### Finding Explanation

1. The factory's total daily working hours (regular + overtime) exceeded the legal daily limit of ten hours in May, June, July, August, and September 2016. In a sample of 50 workers, all worked hours exceeded the legal limit in all five months, with the maximum working hours of 14 hours in a single day. 2. The factory's total weekly working hours (regular + overtime) exceeded the 60 hour limit in May, June, July, August and September 2016 as per FLA benchmarks. In a sample of 50 workers, all of them worked hours exceeding the legal limit, with a maximum of 72 hours in a week. 3. In a sample of 50 workers, 14 workers in May, 15 workers in June, 14 workers in July, 14 workers in August, and 30 workers in September 2016 worked without a day of rest (24 consecutive hours) within a seven-day period, resulting in a maximum of 13 consecutive days of work. 4. There is no identification of pregnant and lactating workers in working-hour records to track and protect concerning working hours. 5. The factory does not provide lactating workers with one hour a day of breastfeeding time, as legally required. 6. The factory does not have any policy or procedures on Hours of Work, although some documents or systems exist to manage practices. 7. The factory's production plan includes overtime.

### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 56, 57, 59, 60 and 71; Minister of Labour Decision in respect to Activities and Time During Which it is prohibited to Employ Women, 2010; Article FLA Workplace Code (Employment Relationship Benchmarks ER.14, ER.16 and ER.24; Hours of Work Benchmarks HOW.1, HOW.2, HOW.4, HOW.5, HOW.6, HOW.7, and HOW.8)

### Recommendations for Immediate Action

1. Ensure that daily (regular + overtime) working hours do not exceed ten hours. 2. Ensure that weekly working hours do not exceed 60 hours. 3. Provide workers with at least one day (24 consecutive hours) of rest for every seven-day period. 4. Provide lactating workers their legally entitled one paid hour of breastfeeding time daily. 5. Ensure that the production capacity planning does include overtime hours.

## VERIFICATION RESULT

### Finding Status

Not Remediated

### Remediation Details

#### Finding Status (Remediated)

Explanation: While workers' total daily working hours (regular plus overtime hours) exceeded eleven hours in December 2017 and April, June, July, August, and September 2018. This does not violate Jordanian Labor Law, therefore this finding is considered remediated.

#### 2. Finding Status (Not Remediated)

Explanation: Workers' total weekly working hours (regular plus overtime hours) exceeded 60 hours in December 2017 and April, June, July, August, and September 2018. Of the 54 sampled workers, 41 migrant workers and two local workers worked more than 60 hours per week, with a maximum of 66 hours in a week.

As a systematic practice, workers work 12 hours per day for three days, then ten hours per day for three days. [HOW.1, HOW.8]

Root Causes: The factory's production plan is frequently based on 66 hours of work per week, especially during peak months.

#### 3. Finding Status (Not Remediated)

Explanation: Of the 54 sampled workers, 31 workers did not receive 24 consecutive hours of rest within every seven-day period in August 2018, resulting in a maximum of nine consecutive days of work. [HOW.2]

Root Causes: Management misinterpreted the FLA requirement. They thought that having an official holiday before that number of working days would not violate the FLA requirements.

#### 4. Finding Status (Not Remediated)

Explanation: The factory's working hours records do not identify pregnant and breastfeeding workers in order to ensure that they receive the relevant working hours protections. [HOW.5]

Root Causes: The factory uses a manual recording system to keep track of female workers with children up to the age of four which they use to provide daycare allowance payments.

#### 5. Finding Status (Partially Remediated)

Explanation: The factory provides breastfeeding workers with a six-hour break each Thursday instead of providing daily one-hour breaks.

#### 6. Finding Status (Remediated)

Explanation: The factory created a policy and procedures on Hours of Work.

#### 7. Finding Status (Not Remediated)

Explanation: The factory's production plan still includes overtime. [HOW.6, HOW.8]

Root Causes:

1. Hiring new workers to cover shortages would cost more than having the existing working work overtime.

2. Hiring new workers to cover shortages is also riskier because production orders could be reduced.

### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 56, 57, and 60; FLA Workplace Code (Employment Relationship Benchmarks ER.14, ER.16 and ER.24; Hours of Work Benchmarks HOW.1, HOW.2, HOW.5, HOW.6, and HOW.8)

### Recommendations for Immediate Action

1. Do not allow or require workers to work more than ten hours per day (regular plus overtime).
2. Do not allow or require workers to work more than 60 hour per week.
3. Provide all workers with at least 24 consecutive hours of rest in every seven-day period.
4. Do not include overtime in production planning.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

2. The management has planned to reduce the overtime progressively. Better coordination with Hong Kong head office production team will be made to avoid overloading of factory capacity and to avoid delay of garment materials. In current stage, factory will try its best to decrease the working hours within 60hrs.

3. The factory will recruit more workers to alleviate the shortage of workers. The production department will adjust the production plan to control the working hours of the workers during the peak season. Production will try its best to ensure that employees have a day off every seven days, and the weekly work hours are controlled within 60 hours.

4. The factory will work out a better HR system to identify pregnant & lactating workers. Before that, the factory will still track manually.

12/31/2019: Completed. All workers on maternity and lactation leave should write an application to the HR department before they leave. Then HR will input workers' information and vacation days into the system. The system will automatically identify the workers on maternity and lactation leave. And the attendance will automatically be generated as the format of maternity and lactation leave, whose color is different from that of regular ones. At the end of each month, HR and compliance are responsible to double check sufficient

pregnant/lactation leave and maternity leave are taken by these workers.

See attached:

6.4 Worker breastfeeding leave (data entry by HR)

6.4 Worker breastfeeding leave taken record

6.4 Worker maternity leave (attendance, with different color)

6.4 Worker maternity leave (data entry by HR)

5. Factory management provided one hour of rest per day to lactating workers. But the worker's home is far from the factory, they choose to take six consecutive hours off every Thursday. Factory respect their wills, and would keep it at current stage.

7. The management has acknowledged this issue and will rearrange the production planning schedule to reduce the workload for workers excludes overtime.

12/31/2019: The factory updated its working hours and Wage Management Procedure, which mentions that production plan should be arranged reasonably and avoid OT.

See attached:

6.7 SOP12--Working Hour and Wage Management Procedure

Action Plan Status:

2. In progress

3. In progress

4. Completed

5. In progress

7. In progress

Planned Completion:

2. 12/31/2020

3. 12/31/2020

4. 12/31/2019

5. 12/31/2020

7. 12/31/2020

Planned completion date

07/26/17

## PREVIOUS FINDING NO.7

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Termination & Retrenchment

##### Finding Explanation

1. Migrant workers' termination documents, which include the explanation of the termination, are not in workers' native language. There is a calculation sheet which needs to be filled by the HR staff and signed by workers that shows the parts of the termination payouts including information of number of working days, overtime working hours, leaves etc. However, these pages are empty. 2. Migrant workers' contracts have a definitive period of three years. Although there has been no incident of restrictions against migrant workers terminating their contract before the three years, the workers do not have information on whose responsibility it is to pay for return tickets, if the contract is terminated before the three years. Additionally, there are no policies or procedures for Retrenchment. Moreover, no written policy is provided including definition of the factory's principles and rules for Termination and Retrenchment. 3. The factory never arranges consultation meetings with workers or worker and/or union representatives before management reaches any final decision on layoffs.

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2 and ER.32)

## Root Causes

1. The HR team records the calculation of the termination payouts in a separate document. The way the calculations are written is illegible. As there are local interpreters in the Human Resources teams who are ready to answer workers' questions on termination payouts, the termination documents are not filled out.

## VERIFICATION RESULT

### Finding Status

Not Remediated

### Remediation Details

#### 1. Finding Status (Not Remediated)

Explanation: Migrant workers' final settlement documents, which include an explanation of their termination, are not in workers' native language(s). [ER.32]

Root Causes: The factory lacks a proper internal review process regarding Termination.

#### 2. Finding Status (Partially Remediated)

Explanation: The factory has policies and procedures on Termination & Retrenchment. However, none of the interviewed migrant workers were aware of whose responsibility it is to pay for a ticket back to their country of origin if their contract is terminated early. [ER.1, ER.16]

Root Causes: The training provided to workers does not concentrate on this issue.

#### 3. Finding Status (Remediated)

Explanation: There have not been any layoffs at the factory.

### Local Law or Code Requirement

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

### Recommendations for Immediate Action

1. Provide termination documents to migrant workers in their local language(s).

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. The final Settlement documents provided by the factory to the workers are translated into the languages of their country and then signed by the employee. And the process has been clearly written in the factory's Employment and Termination Policy.

Please see the attachment: #7.1 Final-Settlement-documents

#### #7.1 Employment \_ Termination Process Policy

2. The factory will prepare training material of Termination & Retrenchment and explain the policy and procedure to the workers. In addition, the factory will use quiz and evaluation form to assess the training effectiveness, and improve progressively.

12/31/2019: The factory has provided all company policies and Code of Conduct to the new workers and existing workers, including the termination procedures. Evaluation and examination are taken after the training to make sure the knowledge are well understood by the workers and learn what need to be improved next time.

See attached:

#### 7.2 New Burmese Worker Training Record 16092019

#### Action Plan Status:

1. Done

2. Done

#### Planned Completion:

1. 02/01/2019

2. 12/31/2019

Planned completion date

07/26/17

## PREVIOUS FINDING NO.8

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Industrial Relations

##### Finding Explanation

1. There is a union in the factory and all the workers become members of the union during the hiring process. However, Jordan's law only allows one union per industry with close ties to the government. This conflicts with FLA's Workplace Code regarding workers' right to establish and to join organizations of their own choosing. Moreover, since the union does not actively operate in any factory in the textile industry, there is no union representative in this factory and no meetings are held for any union activity. The legally required Collective Bargaining Agreement, (CBA) is not provided to the workers therefore they are not able to negotiate or raise any issues. 2. Although the factory declared that there are worker representatives who are freely chosen by the workers, not all worker representatives were chosen in an election. Moreover, most of the workers have not voted for any worker representative, and election vote totals are not provided to the assessors. Ninety percent (90%) of workers do not have any knowledge on their representatives or their responsibilities. Therefore, the worker representative system in the factory is not functional.

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.16; Freedom of Association Benchmark FOA.11, FOA.13, FOA.15 and FOA.20)

### VERIFICATION RESULT

##### Finding Status

Not Remediated

##### Remediation Details

##### 1. Finding Status (Partially Remediated)

Explanation: Local law only allows one union per industry with close ties to the government and the Collective Bargaining Agreement applies to all factories in the garment sector. This conflicts with the FLA Workplace Code and Benchmarks, which requires workers to have the right to establish and join organizations of their own choosing. There are worker representatives in the factory and they hold monthly meetings. The factory does not provide workers with a copy of the CBA, however, the conditions referred to in the CBA are posted in the factory and included in the employee handbook. [FOA.2, ER.16]

Root Causes: The CBA is a very long document and the workers in the factory speak many different languages, so the factory does not think it is feasible to distribute it to all workers.



## 2. Finding Status (Remediated)

Explanation: All current worker representatives were chosen by secret ballot. Workers are aware of who their representatives are and how to approach them. Pictures and names of the worker representatives are posted throughout the factory.

### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.16; Freedom of Association Benchmark FOA.2)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. The content of the factory's CBA is added to the employee handbook which is provided to employees. And it is included into regular training also. So the factory didn't issue CBA to workers repeatedly.

The factory will ensure CBA is known by all workers, and welcome all advice from workers.

Action Plan Status: 1. In progress

Planned Completion: 1. 12/31/2020

#### Planned completion date

07/26/17

## PREVIOUS FINDING NO.9

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Grievance System

#### Finding Explanation

The factory has procedures on Grievance System; however, the factory has not implemented a comprehensive Grievance System. There are suggestion boxes, however, workers do not use the boxes as a way to communicate their grievances. Since the worker representatives are not recognized or elected freely by workers, this system also does not operate properly. Although workers can connect directly with their supervisor and HR staff, those grievances are not documented and there is no systematic feedback system.

#### Local Law or Code Requirement

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

## VERIFICATION RESULT

#### Finding Status

Remediated

#### Remediation Details

1. Finding Status (Remediated)

Explanation: The factory updated its Grievance System policy to include specific timeframes and communication channels for responding to workers' suggestions and grievances. Workers representatives are involved in the management of the suggestion boxes.

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Workplace Conduct & Discipline

#### Finding Explanation

1. The factory's Workplace Conduct & Discipline procedures includes procedures for different types of workplace conduct violations and their monetary penalties. For example, if there is a decrease in quality or quantity of the product, the factory fines the worker by forcing the worker to take two days off work, without pay. Although Jordanian law allows for monetary fines for disciplinary purposes, they are in violation of the FLA Code. 2. The Workplace Conduct & Discipline procedures do not include the following: a requirement to record all warnings and disciplinary actions, and filing requirements; prohibition of applying monetary penalties as a form of disciplinary measure; and mechanism to avoid any type of harassment, abuse and discrimination against workers when implementing disciplinary measures. 3. Disciplinary actions are not witnessed by third party during imposition.

#### Local Law or Code Requirement

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

#### Recommendations for Immediate Action

Remove monetary penalties from the factory's Workplace Conduct & Discipline procedures and cease implementing monetary fines as a form of disciplinary action.

## VERIFICATION RESULT

#### Finding Status

Not Remediated

#### Remediation Details

##### 1. Finding Status (Not Remediated)

Explanation: The factory's Workplace Conduct & Discipline procedures include monetary penalties. For example, if there is a decrease in quality or quantity of a worker's output, the factory fines the worker by forcing them to take two days of unpaid leave. [H/A.2, F.7]

Root Causes: Local law allows monetary penalties and the factory has obtained the Labor Office's approval on its Workplace Conduct & Discipline procedures.

##### 2. Finding Status (Partially Remediated)

Explanation: The factory's Workplace Conduct & Discipline procedures have been updated to include a requirement to record all warnings, disciplinary actions, and requirements that they have copies of warnings and disciplinary actions on file. However, the Workplace Conduct & Discipline procedures still do not include a prohibition on the use of monetary penalties as a form of discipline or mechanisms to avoid any type of harassment, abuse, or discrimination against workers during the imposition of disciplinary actions. [ER.27, H/A.2, F.7]

Root Causes: Local law allows monetary penalties and the factory has obtained the Labor Office's approval on its Workplace Conduct & Discipline procedures.

##### 3. Finding Status (Not Remediated)

Explanation: The imposition of disciplinary actions are still not witnessed by a third party. [ER.27]

Root Causes: Local law does not require a third party witness in the imposition of disciplinary actions.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.27; Harassment or Abuse Benchmark H/A.2; Forced Labor Benchmark F.7)

#### Recommendations for Immediate Action

1. Update the Workplace Conduct & Discipline procedures to remove monetary penalties. Do not implement monetary penalties as a form of disciplinary action.

## COMPANY ACTION PLANS

Action Plan no 1.

Description

1. The factory's workplace conduct & discipline procedure including penalty part is approved by MOL and fulfills the local laws. So the factory will keep it at current stage.

11/27/2019: The factory have revised the disciplinary actions based on warning system. And we have submitted to MOL for approval.

The factory will base on this new by law for disciplinary procedures, no more stop working.

See attached: 2. CMJ Disciplinary Action (Final Version)14112019

12/31/2019: This disciplinary action has been effective already. The factory will follow this one, no more stop working.

See attached: 10.1 CMJ Disciplinary Action revised

2. The factory has acknowledged this issue and will add the elements mentioned into Workplace Conduct & Discipline procedure. The factory will implement the policy and ensure a fair and comprehensive disciplinary procedure in the workplace.

12/31/2019: The factory has updated the disciplinary action procedures according to the latest list of approved disciplinary actions. And disciplinary procedures in the workplace include prohibitions on the use of monetary fines as a disciplinary or mechanism. The factory has posted this procedure file in the workplace.

See attached:

10.2 CMJ-SOP-02 Disciplinary Action Procedures

3. The factory's action of disciplinary action imposition is according to local legal requirements. So the factory will keep it at current stage.

Action Plan Status:

1. Done

2. Done

3. In progress

Planned Completion:

1. 12/31/2019

2. 12/31/2019

3. 12/31/2020

Planned completion date  
07/26/17

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. Safety instructions are not displayed or posted near machinery, in migrant workers' languages. 2. Workers who use chemicals do not use their personal protection equipment (PPE) properly, despite records of PPE training. Some workers in the stain removing section were wearing respirators on top of their dust masks while some of the masks were skewed so did not cover worker's nose. 3. The factory is not taking proactive steps to reduce repetitive-motion stress or injuries, including a lack of ergonomic training and ergonomic breaks. In the knitting section, not all workstations were adjustable to suit individual workers. In the sewing section on the second floor of the main building, the seats are made of wood, have no backs, and are not adjustable to suit individual workers. In the pressing section of the main building, the factory does not provide anti-fatigue mats to standing workers. 4. There was no insulation mat in front of the switchboard in the Indian Building; the factory provided an appropriate mat during the audit. 5. The cover of the electrical box in maintenance room, which is located inside the factory, was open and all the cables were unprotected. The electrical box in the maintenance room outside the Indian building is missing a cover. 6. The grinder machine in the maintenance room does not have a machine guard that protects it from debris, nor does the factory provide workers with goggles. 7. In the factory that does the knitting process, the florescent lights are low enough for workers to easily hit their heads while walking. Additionally, the edges of the lamps are sharp which causes a greater risk of injury. 8. Waste stored behind the factory is not segregated. Furthermore, workers who handle waste do not use any PPE, such as gloves or mask, when disposing of it into the truck. 9. The factory does not investigate the root cause of workplace accidents.

#### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Article 78; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; Regulation No 43 of 1998 on Protection and Safety from equipment Industrial Machines and Job Sites; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.8, HSE.13, HSE.14, and HSE.17)

#### Recommendations for Immediate Action

1. Ensure that risk assessment is conducted in every section, buildings and dormitories of the factory. All risks regarding chemical safety, maintenance safety, worker protection, fire safety, health and safety practises in dormitories, canteen and medical clinic shall be included in risk assessment. 2. Provide safety instructions for the machines in workers' local languages. 3. Provide detailed training on chemical safety and PPE usage to the workers who work with chemicals. Ensure that new workers who will work with chemicals are trained on chemical usage during orientation. 4. Provide insulation mats provided for all switchboxes in the factory. 5. Install machine guards on the grinder machines and provide protective goggles to the operators. Train workers on the proper use of the guards and PPE. 6. Ensure that the workers who perform waste disposal wear the appropriate PPEs.

## VERIFICATION RESULT

#### Finding Status

Not Remediated

#### Remediation Details

##### 1. Finding Status (Partially Remediated)

Explanation: Safety instructions are posted near machinery and on notice boards on each floor except the grinder machine in the maintenance room.

##### 2. Finding Status (Partially Remediated)

Explanation: During the assessment workers were wearing respirators properly, however, workers were wearing protective glasses rather than goggles. [HSE.7]

Root Causes: The factory has not conducted a detailed risk assessment that includes the PPE used by workers who work with chemicals.

##### 3. Finding Status (Partially Remediated)

Explanation: The factory provides anti-fatigue mats to standing workers. However, workers still do not receive training on ergonomics and there are no ergonomic breaks. The factory has not made any improvements to the chairs provided to seated workers. [HSE.17]

Root Causes:

a. The factory has not conducted a detailed risk assessment that includes ergonomic issues.

b. Providing adjustable seats would be very expensive for the factory since there are many seated workers.

##### 4. Finding Status (Remediated)

Explanation: There are insulation mats in front of all of the switchboards in the factory.

##### 5. Finding Status (Remediated)

Explanation: The cover to the electrical box in the maintenance room in the factory building was closed and protected. The electrical box in the maintenance room outside the Indian Building is no longer connected to the electrical system.

##### 6. Finding Status (Not Remediated)

Explanation: The grinder machine in the maintenance room still does not have a machine guard that protects it from debris, nor does the factory provide workers with goggles. [HSE.14, HSE.7]

Root Causes:

1. There are no safety instructions posted in the maintenance room for the grinding machine.
2. The maintenance room is not checked during the internal periodic health and safety inspections, therefore the risk associated with the grinder machine is overlooked.

7. Finding Status (Remediated)

Explanation: According to assessors' onsite observations, soft materials are placed on the edges of the lamps to eliminate the risk of injury. The fluorescent lights were also raised to an appropriate height.

8. Finding Status (Partially Remediated)

Explanation: The factory keeps nylon, paper, and fabric in designated areas in the CMJ Building. Chemical barrels and light bulbs are kept in the hazardous waste area; however, they are not separated. Light bulbs are placed inside empty chemical barrels. Additionally, the chemical sprays used in the stain removing section are disposed of with the domestic waste. The waste in the Indian Building is not segregated at all. Factory workers no longer handle waste as the factory commissioned a third-party waste disposal company. [HSE.9]

Root Causes:

1. The factory does not have a comprehensive and well-established Environmental Protection program.
2. There is no system in place to ensure that the Environment Protection program is applied to all factory buildings or determine whether it is effective or not.

9. Finding Status (Remediated)

Explanation: The factory records workplace accidents and investigates the root causes. Root causes and corrective actions are listed in the investigation reports.

#### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Article 78; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; Regulation No 43 of 1998 on Protection and Safety from equipment Industrial Machines and Job Sites; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.7, HSE.9, HSE.14, and HSE.17)

#### Recommendations for Immediate Action

1. Provide the correct kind of goggles to workers who work with chemicals.
2. Install machine guards on the grinder machines and provide protective goggles to the operators. Train workers on the proper use of the guards and PPE and monitor to ensure compliance.
3. Do not store used light bulbs in the empty chemical barrels; keep them separated. Dispose of chemical sprays in the hazardous waste storage area, not with the domestic waste. Segregate the waste in the Indian Building.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Safety instruction for grinding machine has been posted near the grinder machine in maintenance room.

Please see the attachment: #11.1 safety instruction for grinding machine

2. The factory has purchased goggles. And OSH officers have issued and guided workers how to wear the goggle. Section supervisor and OSH officer will monitor it regularly to ensure workers are wearing PPEs properly during work.

Please see the attachment: #11.2 Stain removing worker wearing goggle during work

3. The factory will learn about ergonomics and provide training to the workers. And the factory will also look for external training opportunities for workers. For ergonomic breaks and adjustable seats, the factory will learn it and discuss with top management and work representatives.

12/31/2019: The factory trained worker regarding ergonomics on the benefits of using antifatigue mats.

See attached:

11.3 Ergonomics -Anti Fatigue Mat Training 24092019

6. The maintenance team is still looking for a suitable material to modify the safety guards for the grinder machine.

Goggles has been purchased. OSH officers have issued and guided workers how to wear the goggle.

In addition, inspection checklist for maintenance room has been created. Maintenance room would be checked during regular monitoring.

Please see the attachment: #11.6 Internal health & safety inspection checklist for maintenace room

#11.6 safety instruction for grinding machine

#11.6 maintenance staff wearing goggle during work

8. The factory will continuously improve its waste management including establish comprehensive policy and procedure, appoint a responsible person, provide training to related staff, design specific hazardous waste area, post instructions in the workshop, etc.

12/31/2019: The factory has established waste management procedures to guide factory's work on waste management. Factory also designated a storage area for hazardous waste project which is under process.

Training in general and hazardous waste related knowledge will be provided to the workers after the completion of hazardous waste area.

See attached:

11.8 Waste Management Procedures

11.8 Hazardous waste classification area (in process)

Action Plan Status:

1. Done

2. Done

3. In progress

6. Done

8. In progress

Planned Completion:

1. 10/10/2018

2. 05/13/2019

3. 12/31/2020

6. 08/01/2019

8. 03/31/2020

Planned completion date

07/26/17

Company Action Plan Update

06/22/2020 update

8. Completed. The factory health and safety team has given general training to workers who need to be exposed to hazardous waste and the new hazardous waste areas have been established.

See attached:

11.8 Hazardous waste training 122019

17.4 The hazardous waste storage area in the factory

## PREVIOUS FINDING NO.12

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. There is not a proper grounding system in the factory. There are maintenance personnel who are responsible for electrical safety, however, there is no record showing the electrical system is properly grounded including dormitory buildings and dormitory kitchen which have big furnaces to cook. 2. The factory does not have a proper lightening protection system. 3. There is no system for periodic maintenance of the compressors. Therefore, the factory has not checked or maintained the boilers in the last year. The boiler room was not well organized, the pipes of the boilers are very old, and the insulation material on the pipes is damaged. 4. Maintenance workers have not received specific training on maintenance.

##### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Article 78; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; Regulation No 43 of 1998 on Protection and Safety from equipment Industrial Machines and Job Sites; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.13 and HSE.14)

##### Recommendations for Immediate Action

1. Ensure that the factory buildings, dormitories, including dormitory kitchens, are properly grounded by an authorized third-party. 2. Check the compressors periodically and ensure that compressors are maintained accordingly by authorized personnel or third party, if required. 3. Check and maintain boilers periodically and provide functional insulation materials for the pipes of the boilers. Ensure that boilers operate properly without any hazard risk.

## VERIFICATION RESULT

### Finding Status

Not Remediated

### Remediation Details

#### 1. Finding Status (Not Remediated)

Explanation: The factory could not provide any grounding measurement records. The internal team of electricians periodically checks the electrical system and measures resistances, however, the factory has not commissioned an authorized company to conduct grounding measurements in the factory buildings, including the dormitory buildings and dormitory kitchen. Therefore, assessors could not verify whether there is a proper grounding system [ER.2, HSE.13]

Root Causes: Management believes that it is very difficult to reach all parts of the electrical system and will require a time-consuming construction process.

#### 2. Finding Status (Remediated)

Explanation: The factory installed a lightning protection system.

#### 3. Finding Status (Partially Remediated)

Explanation: According to a documentation review, the boilers and compressors were inspected by authorized companies in July 2018. The factory's internal maintenance team also inspects the boilers daily and the compressors monthly. However, there are no maintenance records for the compressor in the Indian Building. The pipes of the boilers have maintained, and the factory provided new insulation material to the pipes. The room was well tended according to the first assessment. [ER.2, HSE.13]

Root Causes:

1. In practice, the factory's Health & Safety management system does not apply to all buildings.

2. The internal Health & Safety assessments do not sufficiently cover every risk in the factory.

#### 4. Finding Status (Remediated)

Explanation: According to a documentation review, an authorized company provided training to the maintenance team in August 2017.

### Local Law or Code Requirement

Jordanian Labour Law No. 8 1996, Article 78; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; FLA Workplace Code (Employment Relationship Benchmark ER.2; Health, Safety & Environment Benchmarks HSE.1 and HSE.13)

### Recommendations for Immediate Action

1. Commission an authorized company to conduct grounding measurements in all of the factory buildings (including the dormitory buildings) in order to ensure that the electrical system is safe. Keep records of the measurement results.

2. Commission an authorized company to inspect the compressor in the Indian Building. Periodically conduct internal inspections of the compressor as well. Keep records of the inspections.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. The factory is looking for a third party engineer to inspect all our electrical system including grounding system. Other than that, the OSH team conduct electrical grounding system check daily to ensure it is properly working.

Please see the attachment: #12.1 electrical grounding system checklist

3. The factory has reminded the maintenance team about the compressor in the Indian building should be included into monthly maintenance. In addition, the compressor in the Indian building has been checked by 3rd party as well to ensure it is functional.

Please see the attachment: #12.3 Indian Building compressor Inspection Record 2019

#12.3 Indian Building compressor Inspection Record by Third Party 201901

Action Plan Status:



1. Done

3. Done

Planned Completion:

1. 04/30/2019

3. 05/13/2019

Planned completion date  
07/26/17

## PREVIOUS FINDING NO.13

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The fire drills are not conducted in two out of six dormitory buildings. Moreover, in the other dormitory buildings, the factory conducts fire drills in the morning as workers are moving from the dormitories to the factory, and therefore does not function as a fire drill evacuation. There is missing information in the drill logs regarding the evacuation and the problems observed during the drills. 2. There are no emergency assembly areas in the knitting building or dormitory buildings where workers can gather in the event of an emergency. 3. In the knitting building, there are no signs directing workers to the exit at the back of the building that leads them outside. 4. There is a doorsill on the emergency exit in fourth dormitory building which poses a risk of falling in the event of an emergency evacuation. 5. In the storage section of the CMJ Building, the exit door is also used for shipment as a dock door and there is no protection or barrier which poses a risk of falling during an evacuation. 6. Three forklifts in the CMJ Building do not have fire extinguishers or visual alarm systems. 7. At the left side of the production floor in the CMJ Building, the exit route used for evacuation does not have any emergency lights. (part one)

##### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 78 and 80; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.5, and HSE.6)

##### Recommendations for Immediate Action

1. Conduct fire drills in every factory and dormitory building and ensure all workers are evacuated safely. 2. Maintain a detailed log of fire drills for each building that includes problems observed during evacuation, number of workers evacuated, and duration of evacuation. 3. Designate emergency assembly areas for the knitting building and dormitory buildings with 'emergency assembly point' signs. While assigning the assembly areas, take into consideration the number of the workers who live or work in those buildings as well as the location of the assembly areas. Assembly areas should not be near buildings to reduce risk of injury from fire. 4. Place signs in the back yard of the knitting building that show the assembly point. Inform workers and test with a fire drill. 5. Ensure that all emergency exits, including those in the dormitory buildings, are designed for easy evacuation and none have doorsills that pose a falling risk. 6. Create an accounting system to ensure that all workers are evacuated from the buildings in an emergency. 7. Ensure that the exit in the storage department in the CMJ Building has appropriate precautions such as a barrier for the workers to avoid falling in case of an emergency, additionally this should not to be used as a shipment dock.

### VERIFICATION RESULT

##### Finding Status

Not Remediated

### Remediation Details

#### 1. Finding Status (Partially Remediated)

Explanation: According to a documentation review and worker interviews, fire drills were conducted in all dormitory buildings on June 28, 2018 and March 28, 2018, and records were maintained. However the factory has not conducted a fire drill at night or with the power fully shut down.

#### 2. Finding Status (Remediated)

Explanation: The factory provided emergency assembly areas in the knitting and dormitory buildings.

#### 3. Finding Status (Not Remediated)

Explanation: There are still no signs in the knitting building directing workers to the emergency exit. [HSE.5]

Root Causes: The factory's internal Health & Safety assessments do not sufficiently cover every risk in the factory.

#### 4. Finding Status (Remediated)

Explanation: The door sill of the emergency exit in the fourth dormitory building was removed.

#### 5. Finding Status (Partially Remediated)

Explanation: The exit door in the storage section of the CMJ Building is still a loading door, although the loading process is not frequently used, and there was no truck in front of the loading door during the assessment. There are hand rails for the loading door, and the factory installed a chain during the assessment to prevent falls. [HSE.5]

Root Causes: The factory's internal Health & Safety inspections do not sufficiently cover every risk in the factory.

#### 6. Finding Status (Remediated)

Explanation: The factory provided fire extinguishers and visual alarm systems for the three forklifts.

#### 7. Finding Status (Remediated)

Explanation: According to assessors' onsite observations, there are a sufficient number of emergency lights in the CMJ Building.

### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 78 and 80; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.5, HSE.6, and HSE.13)

### Recommendations for Immediate Action

1. Post signs in the knitting section that lead to the emergency exit.
2. Install a chain or other barrier for the loading door.
3. Establish and implement a system to account for all workers in the dormitories during an emergency evacuation.
4. Install protective covers for the fluorescent light bulbs in the dormitory kitchens.
5. Keep fire-fighting equipment where it can be easily accessed in the event of an emergency.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. The factory does not have night shift workers. Currently, the factory provides at least two fire drills to workers every year, including fire drills for the dormitory as the local laws and buyer's requirement. While the factory will arrange fire drill at night or with the power fully shut down to assess their escape ability.

3. The factory has notified the health and safety officer to paint the arrow directs to exit in the knitting building. And health and safety officer is responsible to check the arrows regularly during the inspection and re-paint in time if necessary.

Please see the attchment: #13.3 The arrow points to the exit

5. The factory installed a chain there to prevent falls that was checked by FLA auditor already during assessment.

#### Action Plan Status:

1. In progress

3. Done

5. Done

Planned Completion:

1. 12/31/2020

3. 10/07/2018

5. 10/02/2018

Planned completion date  
07/26/17

## PREVIOUS FINDING NO.14

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. In the washing section of the CMJ Building, the floor that leads to the second exit door was uneven which poses a risk of falling during an evacuation. 2. There is no system to account for all workers during an emergency evacuation. 3. Ten percent (10%) of the fire extinguishers throughout the factory are mounted higher than the legal limit (max 150 cm), which makes the extinguishers difficult to lift and use in the event of an emergency. 4. In the canteen, in the Knitting Building and in the sewing section of CMJ Building the florescent lights do not have covers to protect against dust accumulation, posing a potential fire hazard. 5. The fire brigade does not have the appropriate equipment to fight fires (including the correct PPE, such as breathing apparatus). 6. The plastic bag on the fire extinguisher in the dormitory kitchen has not been removed. 7. The factory internally keeps periodic checks of the fire alarms and fire hoses. Although the factory has found the same consistent problems, such as broken fire alarm buttons and missing fire hose connection parts, and have consequently fixed those problems; there is no root cause analysis conducted on these risks.

##### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 78 and 80; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.5, and HSE.6)

##### Recommendations for Immediate Action

1. Ensure that the exit in the storage department in the CMJ Building has appropriate precautions such as a barrier for the workers to avoid falling in case of an emergency, additionally this should not to be used as a shipment dock. 2. Provide fire extinguishers and visual fire alarms for all forklifts. 3. Install emergency lights in the evacuation route located at left side of the CMJ building. 4. Ensure that the floors are even and safe in the washing section, so as to not obstruct evacuation. 5. Ensure that the florescent lights in the canteen in the knitting building and in the sewing section have appropriate protections against dust. 6. Mount all fire extinguishers (max 12 kg) at the proper height (max 150cm), as per legal requirements. 7. Remove all plastic bags from the fire extinguishers for easy access during an emergency. 8. Investigate the causes of internal health & safety findings and take corrective action to reach sustainable solutions regarding the risks.

### VERIFICATION RESULT

##### Finding Status

Partially Remediated

##### Remediation Details

1. Finding Status (Remediated)

Explanation: The floor leading to the second exit door in the washing section in the CMJ Building was fixed.

## 2. Finding Status (Partially Remediated)

Explanation: According to the fire drill records, the factory has a system to account for all workers in the factory buildings during an emergency evacuation. However, there is no system to account for workers in the dormitory buildings. [HSE.5]

Root Causes:

1. The factory does not have a system to ensure that all fire drills comply with the same requirements.
2. The Health & Safety management system is not systematically implemented in all buildings.

## 3. Finding Status (Remediated)

Explanation: All fire extinguishers are mounted at the proper height and are easily accessible in the event of an emergency.

## 4. Finding Status (Partially Remediated)

Explanation: All florescent lamps in the factory, except for those in the dormitory kitchen, have protective covers. [HSE.13]

Root Causes: The factory's internal Health & Safety inspections do not sufficiently cover every risk in the factory.

## 5. Finding Status (Partially Remediated)

Explanation: The factory has the appropriate equipment to fight fires (including the correct PPE, such as breathing apparatus). However, the equipment is kept in a cupboard in Human Resources office which is not easily accessible. [HSE.6]

Root Causes: Neither the factory's Health & Safety procedures nor the risk assessment include any information related to fire-fighting equipment except for fire extinguishers to ensure efficient use of PPEs.

## 6. Finding Status (Remediated)

Explanation: A third-party company inspects the fire alarm, fire hoses and fire extinguishers every year. The factory also conducts weekly internal inspections and records all findings and necessary corrective actions. Corrective actions are assigned to the relevant personnel.

## 7. Finding Status: (Remediated)

Explanation: The factory periodically checks the fire alarms and fire hoses, investigates the root causes of consistent problems, keep records of the causes, and keep fixes the problems that are identified.

### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 78 and 80; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.5, HSE.6, and HSE.13)

### Recommendations for Immediate Action

1. Post signs in the knitting section that lead to the emergency exit.
2. Install a chain or other barrier for the loading door.
3. Establish and implement a system to account for all workers in the dormitories during an emergency evacuation.
4. Install protective covers for the fluorescent light bulbs in the dormitory kitchens.
5. Keep fire-fighting equipment where it can be easily accessed in the event of an emergency.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

9. The factory's 2019 dormitory fire drill has covered the attendance table in the fire drill record to track who attend the fire drill. And the requirement of including attendance in fire drill record has been added into fire safety policy.

Please see the attachment: #13.9 Health & Safety Policy

#13.9 attendance of Fire drill training in dorm 20190423

#13.9 Fire drill training report in dorm 20190423

11. The factory maintenance department has replaced the lamps in the dormitory kitchen with LED tubes and equipped with protective covers to prevent dust from accumulating and causing fires.

Please see the attachment: #13.11 florescent lamps with protective covers installed in the dormitory kitchen.

12. The fire brigade was informed about the location of the fire fighting equipment and agreed that it is easily accessed. While the factory will include it into next risk assessment and fire drill to see if extra fire fighting equipment putting in workshop is necessary. If yes, the factory will add more in workshop.

12/31/2019: The factory has moved the cabinet to the place where is near escape staircase and posted the emergency contact if any workers need to use the fire equipment in the cabinet, and emergency instruction. Health and safety policy also updated accordingly.

See attached:

13.12 Fire equipment cabinet

13.12 Health & Safety Policy 24122019

Action Plan Status:

9. Done

11. Done

12. Done

Planned Completion:

9. 04/23/2019

11. 11/29/2018

12. 12/30/2019

Planned completion date

07/26/17

Company Action Plan Update

07/02/18 : 07/11/2017: Assembly points have been set for Knitting building. And we have educated the workers during fire drill training.

## PREVIOUS FINDING NO.15

### IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. There is a maintenance room located near the Indian building. This room is not well organized and there are some paints and chemicals (thinner and glue) on the ground and on the shelves. Material Safety Data Sheets (MSDSs) for the thinners and the paints are missing. Moreover, the factory has not provided secondary containers for any chemical or paint stored in either maintenance rooms. 2. The factory does not make MSDSs available to the workers in their native languages.

#### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996 Article 78; Regulation No 43 of 1998 on Protection and Safety from Equipment, Industrial Machines, and Job Sites; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.9, and HSE.10)

#### Recommendations for Immediate Action

1. Create an inventory of all chemicals in the factory and provide proper MSDSs for all chemicals and hazardous substances used and stored onsite. Make all MSDSs available in the local language and workers' native languages. 2. Ensure that the workers who work with chemicals, including maintenance workers, have received training on chemical usage, PPE, and chemical hazards. 3. Provide secondary containers for the chemicals and dyes in the maintenance room. 4. Include written instructions regarding chemical spills in the emergency plan.

## VERIFICATION RESULT

#### Finding Status

Not Remediated

#### Remediation Details

##### 1. Finding Status (Not Remediated)

Explanation: Assessors observed a bottle of thinner located in the maintenance room located near the Indian Building, but there were no Material Safety Data Sheets (MSDS) for the thinner. [HSE.2, HSE.10] There was no paints or glue in the maintenance room during the assessment.

Root Causes: The factory's internal Health & Safety inspections do not cover the maintenance room.

##### 2. Finding Status (Partially Remediated)

Explanation: There are MSDS posted in the washing section in the languages spoken by the workers, however, the MSDS in the stain removing section are not provided in the workers' native languages. [HSE.2, HSE.10]

Root Causes: The factory's internal Health & Safety inspections do not sufficiently cover every risk in the factory.

#### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996 Article 78; Regulation No 43 of 1998 on Protection and Safety from Equipment, Industrial Machines, and Job Sites; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.2, and HSE.10)

#### Recommendations for Immediate Action

1. Post MSDS wherever chemicals are used or stored.
2. Make MSDS available in all of the languages spoken by workers.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. The factory maintenance department has moved the thinner to the chemical warehouse and posted MSDS nearby.

In addition, the factory cover the maintenance room during internal health & safety inspection.

Please see the attachment: #14.1 thinner in chemical warehouse

#14.1 Internal health & safety inspection checklist for maintenance room

2. The factory health and safety officer has posted the MSDS in all workers' native language in the stain removing section.

Please see the attachment: #14.2 Employee's native language MSDS posted in stain removing section

Action Plan Status:

1. Done

2. Done

Planned Completion:

1. 10/05/2018

2. 10/07/2018

Planned completion date

07/26/17

## PREVIOUS FINDING NO.16

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The first aid kit in the canteen is completely empty of first aid supplies. 2. There are no flushes in the toilets and workers use water bowls to flush the toilets, posing a hygiene risk and the risk of falling due to wet floors. 3. There is no soap in the toilets for washing hands. 4. In the knitting building on the second floor, there are three first aid boxes that are all empty. 5. There is no gas detector in one of two dormitory kitchens. 6. There are no washing machines in dormitories, as legally required. Workers can only wash their laundry manually in the bathrooms. 7. There are no cabinets or refrigerators for food storage in the dormitory kitchens. 8. The factory does not keep food samples in the event of food poisoning. 9. The medical clinic does not operate during all working hours, including overtime. 10. The factory does not employ a full-time physician for the medical unit, as legally required.

##### Local Law or Code Requirement

Regulation No. (42) Of the Year 1998 on Protective Medical Care and Treatment for Workers Article: 7; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; Instruction No: 1 Of 2011 For Prevention of Health Hazards Resulting from Housing Units of Labor Camps; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.6, HSE.18, HSE.19, HSE.20, HSE.22, and HSE.25)

##### Recommendations for Immediate Action

1. Ensure that all first aid kits are filled with the appropriate items. 2. Provide flushing toilets and soap for the toilets to maintain hygiene. 3. Install a gas detector in all dormitory kitchens. 4. Provide washing machines in the dormitories, as legally required. 5. Provide cabinets and a refrigerator for food storage in the dormitory kitchens. 6. Keep food samples for at least 72 hours to take precautions in case of food poisoning. 7. Ensure that medical facilities are open and operating during all working hours, including overtime hours. 8. Employ three full-time physicians for the medical units, as per legal requirements.

### VERIFICATION RESULT

##### Finding Status

Not Remediated

##### Remediation Details

1. Finding Status (Remediated)

Explanation: All first aid kit in the canteen is stocked with the required supplies and is periodically checked by the responsible personnel.

2. Finding Status (Not Remediated)

Explanation: The toilets still do not flush. Workers use bowls of water to flush the toilets, posing a hygiene risk as well as a fall risk due to

wet floors. [HSE.19, HSE.20]

Root Causes:

1. This is a cultural issue. The workers are used to flushing toilets manually.

2. According to management automatic flushing mechanisms break quickly due to the large number of workers.

3. Finding Status (Remediated)

Explanation: The factory provided soap in the restrooms.

4. Finding Status (Remediated)

Explanation: All first aid kits in the knitting building are stocked with the required supplies and are periodically checked by the responsible personnel.

5. Finding Status (Remediated)

Explanation: The factory provided gas detectors in the dormitory kitchens.

6. Finding Status (Not Remediated)

Explanation: There are still no washing machines in the dormitories, as legally required. Workers must hand wash their laundry in the restrooms. [HSE.1, HSE.25]

Root Causes: According to management, this is common practice in Jordan for the migrant workers' dormitories.

7. Finding Status (Not Remediated)

Explanation: There are still no cabinets or refrigerators for food storage in the dormitory kitchens. [HSE.25]

Root Causes: According to management, this is common practice in Jordan for the migrant workers' dormitories.

8. Finding Status (Not Remediated)

Explanation: The factory still does not keep food samples in the event of food poisoning. [HSE.19, HSE.22]

Root Causes: The factory's risk assessment does not cover food poisoning.

9. Finding Status (Remediated)

Explanation: The medical clinic is accessible during all working hours, including overtime.

10. Finding Status (Partially Remediated)

Explanation: The factory has one full time doctor, however, according to legal requirements the factory needs to hire two more doctors. [HSE.18]

Root Causes: There is no system in place to check that the factory complies with all legal requirements.

#### Local Law or Code Requirement

Regulation No. (42) Of the Year 1998 on Protective Medical Care and Treatment for Workers Article: 7; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; Instruction No: 1 Of 2011 For Prevention of Health Hazards Resulting from Housing Units of Labor Camps; FLA Workplace Code (Health, Safety, & Environment Benchmarks HSE.1, HSE.18, HSE.19, HSE.20, HSE.22, and HSE.25)

#### Recommendations for Immediate Action

1. Provide flushing mechanisms for all toilets.
2. Provide washing machines in the dormitories, as legally required.
3. Provide cabinets and a refrigerator for food storage in the dormitory kitchens.
4. Keep food samples for at least 72 hours.
5. Hire two more full-time physicians for the clinic, as legally required

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

2. The factory will consider whether to install an automatic flushing device in the toilet. Before the automatic flushing device realized, the OSH team will include this on their daily tasks and following up with cleaning supervisor to make sure the toilet are kept clean and dry.

6. The factory once provided washing machines to workers. However, it was broken down after few months, as workers were not familiar with it and misuse it. Moreover, workers prefer to wash their laundry manually instead of using public washing machines. So in current stage, factory will keep current practice.

7. The factory will consider whether it is necessary to install refrigerators and lockers in the dorm kitchen.

12/31/2019: Factory has taken action and installed big refrigerators in the two main cafeterias and provided vegetables basket in each room. Memo for the use of the refrigerators have been translated into their native languages and posted beside the refrigerators.



See attached:

15.7 New refrigerator installed in the cafeteria of dorm

8. The factory already arrange kitchen staff to keep food samples in the refrigerator of kitchen every day for 72 hrs. In addition, the health and safety specialist has covered food poisoning in risk assessment.

And health and safety specialist will monitor its implementation.

Please see the attachment: #15.8 food sample

10. There is a clinic within the QIZ and 2 hospitals nearby the Industry zone with 5 minutes car distance. So if emergency case happens, the factory can deliver patients to the outside clinic/hospital in short time. Moreover, our internal 1doctor & 3 nurses are with 24 hour-oncall shifts.

According to Ministry of Labor, the factory worker more than 1,000 and only need one doctor and two nurses. So our current practice aligns with the local requirement.

Please see the attachment: #15.10 Ministry of Labor document on factory clinic

Action Plan Status:

2. In progress

6. In progress

7. Done

8. Done

10. Done

Planned Completion:

2. 12/31/2020

6. 12/31/2020

7. 11/01/2019

8. 01/02/2019

10. 01/02/2019

Planned completion date  
07/26/17

## PREVIOUS FINDING NO.17

### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The Health & Safety policies do not include any statement on being compliant with local laws or FLA Code compliance. 2. The Health & Safety procedures do not include information on 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 and what workers should do in case of injury. Moreover, there are no written steps for reporting death, injury, illness, or other Health & Safety issues. 3. The factory does not review its Health & Safety policy and procedure on a periodic basis.

##### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.31, Nondiscrimination Benchmark ND.8; Health, Safety, & Environment Benchmarks HSE.1 and HSE.12)

### VERIFICATION RESULT

##### Finding Status

Partially Remediated

##### Remediation Details

###### 1. Finding Status (Remediated)

Explanation: The factory updated its Health & Safety policies to include a commitment to comply with all laws, regulations, and FLA Benchmarks.

###### 2. Finding Status (Partially Remediated)

Explanation: According to a documentation review, the Health & Safety procedures were not updated to include the missing information. However, during the assessment, management updated the procedures to include the following information:

- Measures to protect the reproductive health of workers through minimizing exposure to workplace hazards;
- Steps for workers to raise health and safety concerns;
- Protection against retaliation for workers who raise health and safety concerns;
- What workers should do in case of injury;
- Steps for reporting death, injury, illness, or other health and safety issues. [ER.1, ER.31]

###### Root Causes:

- The factory does not have a well-established management system.
- The factory's policies and procedures are not organized or prepared in a systematic way.
- The personnel responsible for the policies and procedures have not received training on the management system, its functions, or the FLA Workplace Code and Benchmarks.

###### 3. Finding Status (Remediated)

Explanation: The factory reviews its Health & Safety procedures annually.

##### Local Law or Code Requirement

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

##### Recommendations for Immediate Action

- Update the Health & Safety procedures to include all information required by the FLA Workplace Code and Benchmarks.

### COMPANY ACTION PLANS

Action Plan no 1.

## Description

2. Required sections added into the health & safety procedure and checked by the auditor during the assessment.

## Planned completion date

07/26/17

## PREVIOUS FINDING NO.18

### IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Environmental Protection

#### Finding Explanation

1. The factory does not have a waste-management plan. 2. The factory does not have a functional environmental protection system and has not identified any negative environmental impacts its on-site operations may generate. 3. Hazardous and non-hazardous waste is mixed. Solid wastes do not have segregated waste streams. 4. The hazardous waste, including florescent lamps and empty chemical containers, are not stored and discharged properly. 5. Oil-contaminated water that comes out of the dryer and compressor is directly discharged outside. 6. The factory does not have an appropriate system to respond to unexpected environmental emergencies, such as chemical spills or gas leaks. 7. The Environmental Protection procedures do not enable workers to raise environmental concerns and do not include protections for workers who allege environmental violations. 8. There are no procedures for reporting environmental emergencies.

#### Local Law or Code Requirement

Regulation No 43 of 1998 on Protection and Safety from Equipment, Industrial Machines, and Job Sites; FLA Workplace Code (Employment Relationship Benchmark ER.31; Health, Safety, & Environment Benchmark HSE.1, HSE.5 and HSE.9)

#### Recommendations for Immediate Action

1. Segregate and store all kind of wastes in separate places according to their type – hazardous and non-hazardous. Ensure that storage areas are secure and protected. 2. Collect the contaminated water that comes from the dryer and compressor in barrels and dispose of it properly.

### VERIFICATION RESULT

#### Finding Status

Not Remediated

#### Remediation Details

Finding Status (Remediated)

Explanation: The factory has a waste management plan.

2. Finding Status (Partially Remediated)

Explanation: The factory created an Environmental Protection system, however, the system does not cover all buildings. The factory does not have an environmental protection system for the Indian Building, and does not segregate hazardous and non-hazardous waste.

[ER.1, ER.31]

Root Causes:

1. The factory does not have a comprehensive Environmental Protection system.

2. The factory does not have a way to ensure that the Environmental Protection system applies to all factory buildings or determine whether it is effective or not.

3. Finding Status (Partially Remediated)

Explanation: The factory keeps nylon, paper, and fabric in designated areas in the CMJ Building. Chemical barrels and light bulbs are kept in the hazardous waste area; however, they are not separated. Light bulbs are placed inside empty chemical barrels. Additionally, the chemical sprays used in the stain removing section are disposed of with the domestic waste. The waste in the Indian Building is not segregated at all. [HSE.9]

Root Causes:

1. The factory does not have a comprehensive and well-established Environmental Protection program.

2. There is no system in place to ensure that the Environment Protection program is applied to all factory buildings or determine whether it is effective or not.

4. Finding Status (Partially Remediated)

Explanation: In the main building chemical barrels and light bulbs are stored in the hazardous waste storage area, however, they are not separated. Light bulbs are placed inside empty chemical barrels. The factory disposes of the chemical barrels and light bulbs properly. Medical waste is also discharged properly. In the second building the factory has not created a system to segregate and discharge the wastes properly. [HSE.9]

Root Causes:

1. The factory does not have a comprehensive and well-established Environmental Protection program.
2. There is no system in place to ensure that the Environment Protection program is applied to all factory buildings or determine whether it is effective or not.

5. Finding Status (Not Remediated)

Explanation: The oil-contaminated water that comes out of the dryer and compressor is discharged directly into the outside environment. [ER.1, ER.31]

Root Causes:

1. The factory does not have a comprehensive and well-established Environmental Protection program.
2. There is no system in place to ensure that the Environment Protection program is applied to all factory buildings or determine whether it is effective or not.

6. Finding Status (Partially Remediated)

Explanation: The factory has established procedures on how to respond to chemical spills, however, there are no procedures on how to respond to other environmental emergencies such as gas leaks. [HSE.5]

Root Causes: The factory's risk assessment does not cover gas leaks.

7. Finding Status (Not Remediated)

Explanation: The Environmental Protection procedures do not enable workers to raise environmental concerns and do not include protections for workers who allege environmental violations. [ER.1, ER.31]

Root Causes:

1. The factory does not have well-established management system.
2. The factory's policies and procedures are not organized or prepared in a systematic way.
3. The personnel responsible for the policies and procedures have not been trained on the management systems, its functions, or the FLA Workplace Code and Benchmarks.

8. Finding Status (Partially Remediated)

Explanation: The factory has established procedures on how to respond to and report chemical spills, however, there are no procedures on how to respond to and report other environmental emergencies such as gas leaks. [HSE.5]

Root Causes: The factory's risk assessment does not cover gas leaks.

#### Local Law or Code Requirement

Regulation No 43 of 1998 on Protection and Safety from Equipment, Industrial Machines, and Job Sites; FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.31; Health, Safety & Environment Benchmark HSE.1, HSE.5, and HSE.9)

#### Recommendations for Immediate Action

1. Ensure that the Environmental Protection program and waste management plan cover all buildings.
2. Update the Environmental Protection procedures to include information on how to respond to and report environmental emergencies such as gas leaks.
3. Update the Environmental Protection procedures to include steps for workers to raise environmental concerns and protections for workers who allege environmental violations.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

2. The factory will continuously improve its waste management and environmental protection system including establish comprehensive policy and procedure, appoint a responsible person, provide training to related staff, design specific hazardous waste area, post instructions in the workshop, etc.

12/31/2019: The factory has established comprehensive Environmental Management System Procedure

See attached:

17.2 Environmental Management System Procedure

3. The factory will continuously improve its waste management and environmental protection system including establish comprehensive policy and procedure, appoint a responsible person, provide training to related staff, design specific hazardous

waste area, post instructions in the workshop, etc.

12/31/2019: The factory has established Solid Management Plan, and assigned both of hazardous waste and non-hazardous waste area which are under process.

See attached:

#### 17.3 Solid Waste Management Plan.

4. The factory will continuously improve its waste management and environmental protection system including establish comprehensive policy and procedure, appoint a responsible person, provide training to related staff, design specific hazardous waste area, post instructions in the workshop, etc.

12/31/2019: The factory has established Chemical Safety Management Procedure and assigned storage areas for hazardous waste project which are under process. Training in general and hazardous waste related knowledge will be provided to the workers after the completion of hazardous waste area.

See attached:

#### 17.4 Chemical Safety Management Procedure

5. The factory will find an appropriate container to collect the oil contaminated water from dryer and compressor, and look for qualified 3rd party to dispose the hazardous waste.

6. The factory will include more environmental emergency risks into risk assessment and set up procedure accordingly.

12/31/2019: The factory has established Emergency procedures that cover chemical and gas leakage.

See attached:

#### 17.6 Environmental Emergency Handling Procedures

7. The factory will include the mentioned items into environmental protection procedure to encourage more workers to participate in environmental protection program.

12/31/2019: The factory has added the mentioned items into environmental management system procedure.

See attached:

#### 17.2 Environmental Management System Procedure

8. The factory will include more environmental emergency risks into risk assessment and set up procedure accordingly.

12/31/2019: The factory has added how to respond to and report gas leak in the environmental emergency handling procedures.

See attached:

## 17.6 Environmental Emergency Handling Procedures

### Action Plan Status:

2. Done
3. In progress
4. In progress
5. In progress
6. Done
7. Done
8. Done

### Planned Completion:

2. 12/31/2019
3. 03/31/2020
4. 03/31/2020
5. 03/31/2020
6. 08/12/2019
7. 12/31/2019
8. 12/31/2019

### Planned completion date

07/26/17

### Company Action Plan Update

06/22/2020 update:

3. Completed. The factory has completed the establishment of the hazardous waste area, and will continue to implement according to the hazardous waste and hazardous chemicals procedures, and continue to improve on the basis of protecting the environment.

See attached:

17.4 The hazardous waste storage area in the factory

4. Completed. The factory has completed the establishment of the hazardous waste area, and will continue to implement according to the hazardous waste and hazardous chemicals procedures, and continue to improve on the basis of protecting the environment.

See attached:

17.4 The hazardous waste storage area in the factory

5. Completed. The factory has fixed the dryer and replaced the new compressor, which does not leak oil. The maintenance department is responsible to conduct regular inspection.

See attached:

17.5 New compressor in the factory

## PREVIOUS FINDING NO.19

### SUSTAINABLE IMPROVEMENT REQUIRED

**FINDING TYPE:** Communication & Worker Involvement (Macro)

#### Finding Explanation

The worker integration component is missing across all Employment Functions. This indicates that the factory has not established procedures to request and/or receive workers' input or feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.16, ER.25.2, ER.29, ER.30; Compensation Benchmark C.17)

### VERIFICATION RESULT

#### Finding Status

Partially Remediated

#### Remediation Details

1. Finding Status (Partially Remediated)

Explanation: Workers are able to raise health and safety concerns through the worker representatives and worker representatives have a meeting with the management periodically to and decisions for Health and Safety are made according to those meetings, so the worker integration component is in place for Health & Safety. However, the worker integration component is missing across all other Employment Functions. The factory has not established procedures to request and/or receive workers' input/feedback regarding the creation, implementation, and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes. [ER.1, ER.25]

#### Root Causes:

1. Since management receives workers' suggestions via the dialogue mechanism, the factory has not established a system to involve workers in the decision-making processes.

#### Local Law or Code Requirement

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

#### Recommendations for Immediate Action

1. Establish a system for integrating workers into the process of revising policies and procedures and receiving the workers' input into different facets of the factory's operations.
2. Improve the internal audit system to ensure that the factory's actual practices are in line with local law and FLA Code.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

The factory will create more channels and opportunities for workers to participate factory management activities, including document establish and update, factory decision making.

#### Planned completion date

07/26/17

#### Company Action Plan Update

06/20/2020: The factory has updated in the factory process document management system about the need for workers to participate in the process of updating and decision-making process documents as required.

See attached:

19.1 CMJ-SOP-01 Factory Procedure Management Policy

## PREVIOUS FINDING NO.20

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Review Process (Macro)

#### Finding Explanation

The factory has a review system for the existing policy and procedures; however, the revisions are tracked on an Excel document instead of filed in the same folder as the documents under review. Therefore, it was difficult for the assessment to verify whether the policies and procedures had been properly reviewed and revised.

#### Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.1.3, ER.31)

#### Root Causes

1. Management lacks awareness of FLA Workplace Code. 2. These issues have not been brought to the factory management's attention during previous internal and external audits.

#### FLA's Recommendations for Sustainable Improvements

Ensure that all policies and procedures are kept on file, including the previous versions, and add a revision number and date to all



existing policies and procedures.

## VERIFICATION RESULT

### Finding Status

Not Remediated

### Remediation Details

Finding Status (Not Remediated)

Explanation: The factory still does not have a system to regularly review and update its policies and procedures. Some of the policies and procedures have a revision date section and some of them do not, making it difficult to tell which have been reviewed and updated.

[ER.1, ER.29, ER.30, ER.31]

Root Causes:

1. The factory does not have well-established management system.
2. The factory's policies and procedures are not organized and prepared in a systematic way.
3. The personnel responsible for the policies and procedures have not been trained on the management system or its functions.

### Local Law or Code Requirement

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

### Recommendations for Immediate Action

1. Establish and implement a system to regularly review all policies and procedures and update them according to local law and the FLA Workplace Code and Benchmarks. Include a revision date section on all policies and procedures.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

The factory will develop a detailed document update policy and procedure. And all factory policies and procedures are required to be updated at least one a year, and whenever there is big change happen. Revision date should be there.

12/31/2019: The factory established a management policy regarding procedural documentation and records, to ensure that documents and records are appropriately created; revised, accessed, managed in a manner that reflects business, corporate and regulatory compliance requirements.

See attached:

19.1 CMJ-SOP-01 Factory Procedure Management Policy

#### Planned completion date

07/26/17

## New Findings and Action Plans

### NEW FINDING NO.1

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

#### Finding Explanation

1. The fire alarm buttons in the canteen do not work properly. One didn't start when tested and the other

malfunctioned, faded out, and generated smoke. [HSE.1] [HSE.5]

2. The canteen workers hang their bags on the fire extinguishers. [HSE.5]

3. The emergency exit door in the washing section slides up rather than opening outward. In addition, the door is too short and could cause workers to hit their heads during an emergency evacuation. [HSE.5]

4. There are no signs in the washing section leading through the emergency exit to the emergency assembly area. [HSE.5]

#### Local Law or Code Requirement

Jordanian Labour Law No: 8 1996, Articles 78 and 80; 1998 Instructions for Protection of Workers and Establishments from Workplace Hazards; Instruction No: 1 Of 2011; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 and HSE.5)

#### Recommendations for Immediate Action

1. Repair or replace the fire alarm buttons in the canteen.

2. Remove bags from the fire extinguishers.

3. Replace the emergency exit door in the washing section with one that opens outwards and is an appropriate size.

4. Post signs in the washing section that lead to the emergency exit.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. The factory maintenance department installed a new fire alarm control panel which can monitor the working condition of all fire alarm in canteen. All fire alarms are under good working condition now. And maintenance team will check it regularly and fix in time if needed.

Please see Attachment: #New 1.1 fire alarm control panel

2. The factory canteen supervisor immediately removed the bag. And factory health and safety specialist would check daily to ensure fire fighting equipment in the factory is free of block and easily accessed. Please see Attachment: #New 1.2 The bag was removed from the fire extinguisher.

3. The factory maintenance department change the door to a push bar door. Please see the attachment: #New 1.3 push bar door in the washing dept

4. The factory Health and Safety Specialist posted sign to indicate the correct direction from emergency exit to the assembly area.

Please see the attachment: #New 1.4 arrow points to the assembly area in washing dept

1. 10/30/2018

2. 02/10/2019

3. 04/15/2019

4. 10/07/2018

## NEW FINDING NO.2

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The Liquefied Petroleum Gas (LPG) detectors in the kitchen and the LPG cylinder storage area are not functional. [HSE.6, HSE.9]
2. Assessors observed cockroaches near the food storage areas. [HSE.19, HSE.22]
3. The chilled food storage area is not segregated to avoid food contamination. The vegetables are stored below the raw chicken and none of the food is covered. [HSE.19, HSE.22]
4. The canteen workers were not wearing gloves during the assessment. [HSE.19, HSE.22]

##### Local Law or Code Requirement

FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.9, HSE.19, and HSE.22)

##### Recommendations for Immediate Action

1. Install LPG detectors in the kitchen and LPG cylinder storage area.
2. Commission an exterminator to spray for cockroaches.
3. Cover and segregate all food in the chilled food storage area. Do not store raw meat above vegetables.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. The factory maintenance department replaced new LPG detectors. And the maintenance team will periodically check if the detectors are working properly.

Please see the attachment: #New 2.1 New LPG detectors

2. Factory Health and Safety Officer arranged pest control on the kitchen. And daily clean is arranged now.

Please see the attachment: #New 2.2 pest control receipt

3. The canteen supervisor will conduct hygiene inspection daily and classify the food to avoid food contamination problem.

Please see Attachment: #New 2.3 seafood & meat frozen area #New 2.3 vegetable storage area

4. The canteen supervisor would remind all canteen staff wearing gloves during work to ensure that workers' food hygiene is protected.

Please see the attachment: #New 2.4 canteen worker wearing gloves during work

1. 11/20/2018

2. 10/07/2018

3. 10/16/2018

4. 11/29/2019

### NEW FINDING NO.3

#### SUSTAINABLE IMPROVEMENT REQUIRED

#### FINDING TYPE: Termination & Retrenchment

##### Finding Explanation

Migrant workers' final settlement documents do not include information on the workers' annual leave balance.

##### Local Law or Code Requirement

Jordan Labor Law Article 63, FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.19 and ER.32

#### COMPANY ACTION PLANS

Action Plan no 1.

##### Description

The "annual leave balance days" has been added to the final settlement documents for termination employees.

Please see attachment: #New 3.1 final settlement documents (English)

### NEW FINDING NO.4

#### SUSTAINABLE IMPROVEMENT REQUIRED

## FINDING TYPE: Compensation

### Finding Explanation

Food and accommodation services are mandatory to use for the migrant workers. In case workers do not want to use these benefits, they cannot receive the payment in cash. This is mandated in the factory Collective Bargaining Agreement.

### Local Law or Code Requirement

FLA Workplace Code (Compensation Benchmark C.18.1)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

Food and accommodation is "in-kind remuneration", which is clearly stated in the unified contract and CBA.

For in-kind benefit, workers have rights to complain the food when they are unhappy about the taste, quality or quantity, and factory need to address the issues. This rules and regulations were passed through the consent of all legal parties before handing over to factory to follow.

So, what the factory doing is completely obeys the unified contract and CBA.