



FAIR LABOR
ASSOCIATION_®

INDEPENDENT EXTERNAL ASSESSMENT REPORT



COMPANIES: alphabroder
COUNTRY: Bangladesh
ASSESSMENT DATE: 11/10/18
ASSESSOR: Insync Global
PRODUCTS: Apparel
NUMBER OF WORKERS: 3500

Summary of Code Violations

Companies that join the FLA agree to uphold the FLA Workplace Code of Conduct throughout their entire supply chain. The Code of Conduct is based on International Labour Organization (ILO) standards, and defines labor standards that aim to achieve decent and humane working conditions.

While it is important to note when violations of the FLA Workplace Code of Conduct occur, the purpose of these assessments is not simply to test compliance against a particular benchmark, but rather to develop an understanding of where and how improvements can be made to achieve sustainable compliance. Code of Conduct violations can be found throughout the course of an assessment of the employment and management functions, and are addressed in companies' action plans.

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. Information on Recruitment, Hiring & Personnel Development, Freedom of Association & Industrial Relations, and Termination & Retrenchment is not included in the provided worker handbook. [ER.15.3]

2. Clause #5 in the signed external food supplier agreement states that food should be made available in factory at 1pm but the lunch breaks start at 12pm. [ER.2]

3. The factory's agreement with the food supplier does not include the FLA Code, except the use of uniforms, aprons, gloves, and caps by food handlers. It does not require the use of a nose mask. [ER.10]

4. The factory does not have written policies and procedures on personnel development or written procedures on recruitment. [ER.1, ER.28, ER.29, ER.30]

6. The factory does not document evaluation results, except for the productivity of the industrial engineering team. Workers do not sign this document. Criteria for evaluation does not include discipline, behavior, teamwork, or attendance. [ER.30]

7. Review of files of 50 sampled workers revealed that consent for physical examination by doctor was not signed by two workers. In the files of ten workers, fingerprints are provided instead of signatures of workers though all workers had signed other employment documents maintained in their files. [ER.1]

8. Employee leave information was not updated for all files reviewed. Management signatures were missing on 15% of the sample, worker signatures are missing for 12%, and worker photographs are missing for 8% of those reviewed. Service books are not maintained for 10% of sampled workers. [ER.2]

9. The factory does not have job descriptions for quality checkers, washing machine, fusing machine, snap button machine, cutting machine operators, or maintenance workers. The factory only has job descriptions for helpers and sewing machine operators. [ER.1]

10. The factory conducted an orientation program for 953 of 4676 workers recruited between January and November 2018. Management stated all new recruits are informed of factory policies and procedures verbally at the time of hiring; however, the factory does not keep documentation. [ER.15]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) Chapter II Section 6; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.2, ER.10, ER.15, ER.28, ER.29 and ER.30)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Include information on Recruitment, Hiring & Personnel Development, Freedom of Association & Industrial Relations, and Termination & Retrenchment in the worker handbook.
2. Either revise the time food is made available in the factory or change the earliest lunch period to match food availability.
3. Include the FLA Code in agreement with the food supplier including the use of a nose mask.
4. Provide written policies and procedures on personnel development and recruitment.
6. Document evaluation results for all workers and have workers sign this document. Include discipline, behavior, teamwork and attendance in evaluation criteria.
7. have workers sign consent for physical examination by doctor.
8. Update employee leave information for all files. Complete management signatures, worker signatures and photos for all files. Maintain service books for all workers.
9. Develop job descriptions for quality checkers, washing machine, fusing machine, snap button machine, cutting machine operators and maintenance workers.
10. Document the orientation program for all workers recruited.

Planned completion date

11/14/18

Company Action Plan Update

1. Work in progress- to be completed April 30, 2019
UPDATE 04012019: updated handbook attached.
2. Factory has corrected the food supplier agreement and now offers food in the factory beginning at 11:30 AM - agreement attached.
3. Work in progress- to be completed April 30, 2019
UPDATE 04012019: Food Supplier agreement updated and attached.
4. Recruitment policy attached.
6. Evaluation results of workers documented in terms of worker's discipline, behavior, teamwork and attendance attached.
7. Factory now takes both the worker's consent and signature for physical examination by doctor, signed attached.
8. Factory updated employees leave information with signature in all files, attached example.
9. Work in progress- to be completed April 30, 2019
UPDATE 04012019: Job Description of quality checker attached.
10. Work in progress- to be completed April 30, 2019
UPDATE 04012019: orientation training attached.

FINDING NO.2

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The factory requires the factory doctor to fill out an age estimation form to assess the age of all workers. The form asks about growth of pubic or auxiliary hair. Further, the form requires information on menstrual history of female workers. This information is maintained in individual worker files by the HR Team and assessors had easy access to this information. The above information is included in all reviewed files. [ER.4]
2. Instead of issuing on the day a worker is hired, the factory issues appointment letters two days and identity cards three days after the hire date. [ER.2]
3. The factory does not keep resignation letters from an employee or a letter of termination of employment issued by the employer for

workers who leave employment without advance notice. [ER.2, ER.27]

4. The factory's probation period is four months, as allowed by local zone authorities, but in violation of the FLA Code which restricts the probation period to three months. [C.3]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) Chapter II Section 5 and Section 27(3A); FLA Workplace Code (Employment Relationship Benchmarks ER.2, ER.4 and ER.27, Compensation Benchmark C.3)

Recommendations for Immediate Action

1. Remove questions from the age estimation form that violate the privacy of workers, beyond indicators to determine their legal age.
2. Issue appointment letters and identity cards to workers on the day they are hired.
3. Maintain resignation letter from employee or letter of termination by employer in file of workers who leave employment without notice.
4. Ensure that the factory's probation period is three months.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Remove questions from the age estimation form that violate the privacy of workers, beyond indicators to determine their legal age.
2. Issue appointment letters and identity cards to workers on the day they are hired.
3. Maintain resignation letter from employee or letter of termination by employer in file of workers who leave employment without notice.
4. Ensure that the factory's probation period is three months.

Planned completion date

11/14/18

Company Action Plan Update

1. Removed the questions that are directed to privacy of the workers.
2. Now issuing appointment letters and identity cards to workers on the day they are hired.
3. If any employee wants to leave his employment, he submits a hand written resignation letter. Where mentioned he is leaving job showing his personal reason. Resignation letter attached . Termination policy also attached.
4. Work in progress- to be completed April 30, 2019.
Update: 06/30/2019: Factory has started 3 month probation period.

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

1. The factory has not included dates or a review period for written policies & procedures. [ER.1, ER 29.1.1, ER 30.2, ER 31.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER 29.1.1, ER 30.2, and ER 31.2)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Include dates and review period for written policies/procedures.

Planned completion date

11/14/18

Company Action Plan Update

Policy attached, dated Jan 1, 2019. Policies and procedures are reviewed twice a year.

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory has no written procedures on compensation. [ER.1]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Provide written procedure for compensation.

Planned completion date

11/14/18

Company Action Plan Update

Written procedure for compensation attached.

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory has not obtained written consent from individual workers for deducting Taka 7 (.08 USD) per day for a provided meal. This deduction is not legally mandated. Management stated that a notice was displayed to communicate this deduction, though no such notice was visible during the factory tour. Management provided a copy of the notice from files. Workers are aware of this deduction and shared no complaints. [C.11]

2. Payment dates are not recorded on pay records for overtime hours worked or terminal dues, so timely payment cannot be confirmed. Management stated that terminal dues for workers who do not formally resign are paid 14-16 days after the worker's last month. [C.15]

3. The factory does not maintain time cards and pay records of terminal dues for workers who leave without notice. [C.15]

4. Wage slips do not reflect overtime hours. [C.13]

5. The factory does not issue wage slips to washing section workers, as confirmed by all workers interviewed from the washing department. [C.13]

6. The factory categorizes thirteen electricians and sixty mechanics as staff and therefore does not compensate them for overtime hours worked. Time records show these workers do work overtime. [C.7]

7. Factory worked for six hours on three separate rest days – April 20, 2018, May 4, 2018 and June 8, 2018 in lieu of additional three days of additional holidays provided with festival holidays in June 2018. Work done on rest days was not compensated at premium rates as legally required. Management stated that work on rest days was done per verbal request from workers and notices (reviewed by assessors) were posted to communicate the work on rest days in lieu of additional days of holidays. Notices posted for work on rest days did not clarify if workers would be or would not be compensated at premium rates for work on rest days. Further, no documentation was maintained for the request from workers. [HOW.2, C.7]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) Chapter X, Sections 123 and 125, Chapter II, Section 2 (65), and Chapter IX Section 104 and 108; FLA Workplace Code (Employment Relationship Benchmark ER.1; Compensation Benchmarks C.7, C.11, C.13 and C.15; Hours of Work Benchmark HOW.2)

Recommendations for Immediate Action

1. Obtain written consent from individual workers for any deduction not legally mandated and maintain written consent in employee files.
2. Record any overtime and terminal dues payments and dates on pay records.
3. Maintain timecards with pay records for workers who leave employment without advance notice.
4. Include all hours worked and compensation paid on wage slips issued to workers.
5. Provide wage slips to workers from washing section.
6. Review categorization of electricians and mechanics and compensate all workers for overtime hours worked.
7. Workers should be compensated at overtime premiums when they work beyond weekly defined regular working hours. Compensatory rest day should be provided for work done on rest days.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Obtain written consent from individual workers for any deduction not legally mandated and maintain written consent in employee files.
2. Record any overtime and terminal dues payments and dates on pay records.
3. Maintain timecards with pay records for workers who leave employment without advance notice.
4. Include all hours worked and compensation paid on wage slips issued to workers.
5. Provide wage slips to workers from washing section.
6. Review categorization of electricians and mechanics and compensate all workers for overtime hours worked.
7. Workers should be compensated at overtime premiums when they work beyond weekly defined regular working hours. Compensatory rest day should be provided for work done on rest days.

Planned completion date

11/14/18

Company Action Plan Update

1. Company policy for this kind of deduction and legal clause attached. 2. Payment dates are now recording on pay records for overtime hours worked or terminal dues. 3. Now maintaining time cards with pay records for workers who leave employment without advance notice. IAttached ID#3012905 (Jibon Ara Begum)for such kind issue. 4. OT hours have been mentioned in wages slip as attached. 5. Wage slips have been provided to workers from washing section as attached. 6.Electrician/supervisors are staff and they are not entitle for OT. Attached appointment letter. 7. Work in progress- to be completed April 30, 2019 UPDATE 06302019: to be completed July 31, 2019. UPDATE 07/29/2019-premium rate has been paid and written record of workers' requests to work on rest days is now kept on file. WWC meeting notes attached. complete.

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The factory hours of work policy states the factory will comply with the Bangladesh Labour Law of 2006. It does not define the factory's policy on working hours and repeats the legal requirement of daily and weekly working hours and breaks. [ER.1, ER.23]
2. The factory has no written procedures on hours of work. [ER.1, ER.23]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.23)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Provide written procedure for working hours and follow accordingly.

Company Action Plan Update

Written procedure for working hours attached.

FINDING NO.7

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. A review of time cards revealed that in October 2018, all 54 sampled workers from all production processes worked between 60 to 70 hours every week, and up to 73 hours the third week. In April 2018, all 33 sampled workers from all production processes worked 60 to 72 hours every week, and in November 2017, all 65 sampled workers worked between 66 to 72 hours a week, while workers from finishing worked between 77 to 93 hours the first week and up to 96 hours the second week of the month. [HOW.1.3, HOW.8.3]
2. 50% of sampled workers worked with only one or two rest days in November 2017, resulting in 14 days of continuous work. [HOW.2]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) Chapter IX Section 102 and Section 103); FLA Workplace Code (Hours of Work Benchmarks HOW.1.3 HOW.2, and HOW.8.3)

Recommendations for Immediate Action

1. Monitor and ensure workers do not work beyond 60 hours a week.
2. Monitor and ensure workers are provided at least day off (24 consecutive hours) in every seven day period.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Monitor and ensure workers do not work beyond 60 hours a week.
2. Monitor and ensure workers are provided at least day off (24 consecutive hours) in every seven day period.

Planned completion date

11/14/18

Company Action Plan Update

1. Provided written policy regarding excessive working hours. Monthly individual Attendance sheet for Dec-2018 and policy attached.
2. In Religious festival, factory closes 8 to 10 days- working days. Now workers getting each holiday. Monthly individual Attendance sheet for Dec-2018 and Adjustment notice attached.

FINDING NO.8

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

1. The factory has no written policy or procedures for retrenchment. [ER.19, ER.32]
2. The factory does not follow legally defined procedures before the termination of workers absent more than ten days. Based on document review, no workers were dismissed due to the above reasons. [ER.27]

Local Law or Code Requirement

Bangladesh Labour Act 2006 (updated in 2015) Chapter II Section 27 (3A); FLA Workplace Code (Employment Relationship Benchmarks ER.19, ER.27 and ER.32)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Provide written policy for retrenchment.
2. Follow legally defined procedures before termination of workers absent more than 10 days.

Planned completion date

11/14/18

Company Action Plan Update

1. Written policy attached.
2. Legal procedures are followed by issuance of letter, attached.

FINDING NO.9

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. The written grievance procedures do not include methods of communication to workers regarding decisions or actions taken because of reported grievances. [ER.25]
2. The factory does not keep a record of workers' verbal grievances communicated to welfare officers. [ER.25]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER.25)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Include methods of communication to workers regarding decisions or actions taken because of reported grievances in the written

- grievance procedures.
2. Keep record of workers' verbal grievances communicated to welfare officers.

Planned completion date

11/14/18

Company Action Plan Update

1. Methods of communication to workers included in attached grievance procedure.
2. Started keeping workers' verbal grievances in a register. Record attached and also part of the grievance policy.

FINDING NO.10

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Industrial Relations

Finding Explanation

1. The factory does not have a written policy on Industrial Relations. [ER.1]
2. Per Bangladesh Export Processing Zone Authority (BEPZA) instructions, when 30% of workers wish to form a WWA (Worker Welfare Association), the factory needs to formally form the Association under supervision from BEPZA officials. The factory sent a letter to BEPZA in October 2018 stating fewer than 30% of workers wanted to form a WWA. The factory did not conduct a review in 2018 to confirm this statement. The factory had conducted a review in 2015 when 87% of workers did not want to form the association and 8% wanted to form the association. 2% of votes were invalid and 3% of workers were absent. [FOA.3]
3. In the absence of a WWA, the factory formed a WWC (Workers Welfare Committee) and management selected worker and management representatives. Most workers interviewed were not aware of the WWC. [FOA.10, FOA.11]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.25; Freedom of Association Benchmarks FOA.3, FOA.10, and FOA.11)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Provide written policy on Industrial Relations.
2. Conduct a review with the workers to determine if 30% or more workers wish to form a Worker Welfare Association.
3. Make workers aware of the Workers Welfare Committee.

Planned completion date

11/14/18

Company Action Plan Update

1. Work in progress - to be completed April 30, 2019. UPDATE 04012019: Industrial Relation Policy attached. 2. Review will be conducted and recorded by May 30, 2019. UPDATE 05122019: WWC documentation attached. 3. Work in progress - to be completed May 30, 2019. UPDATE 05122019: WWC documentation attached.

update 08/08/2019- additional attachments - letter to CEPZ and worker review results

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The approval certificate for a waste collector was valid until June 30, 2017, and though the same individual applied in June 2018 for

renewal, it has yet to be approved. This waste collector has continued to collect waste from the factory without an up-to-date certificate. [HSE.1]

Local Law or Code Requirement

Bangladesh Factories Rules 1979, Section 13; FLA Workplace Code (Health, Safety and Environment Benchmark HSE.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Obtain waste collector approval certificate.

Planned completion date

11/14/18

Company Action Plan Update

Obtained waste collector approval certificate.

FINDING NO.12

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The fused mercury tube lights are stored in open, rather than closed, containers near the fire control room. This is not a restricted area and labels are not posted to warn workers. [HSE.1]

2. The factory has not provided a spill response kit in the chemical storage area and has not installed an alarm for chemical or gas leak emergencies. [HSE.9]

Local Law or Code Requirement

Bangladesh Factories Rules 1979 Section 13; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1 and HSE.9)

Recommendations for Immediate Action

1. Post signs regarding the storage area for fused tube lights and restrict access.

2. Provide a spill response kit in chemical storage and install an alarm to warn workers in case of chemical leak emergencies.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Post signs regarding the storage area for fused tube lights and restrict access.

2. Provide a spill response kit in chemical storage and install an alarm to warn workers in case of chemical leak emergencies.

Planned completion date

11/14/18

Company Action Plan Update

1. Signs posted in storage area for fused tube lights. Also access has been restricted.

2. Spill response kit been provided in chemical storage. Also has been installed required alarm to warn our workers.

FINDING NO.13

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory did not have record of the competency certificate for the third party stability inspector. [HSE.1]
2. The factory has not included steps on how to protect the reproductive health of workers in their written procedures on Health & Safety. The factory has not included steps to evacuate visitors, contractors, special workers or children in the emergency evacuation procedures. The factory has not defined procedures for workers in confined spaces like the underground water tank. There are no written guidance documents for external contractors or service providers. [ER.31, HSE.12]
3. The factory risk assessment focused on hazards and did not include fire, chemical, or electric risks. The report does not include the number of workers who could be impacted, or the frequency, probability, or severity of accidents or injury. The factory does not define engineering or administrative control (training) to reduce risk. The assessment was last conducted in April 2018. [HSE.1]
4. The factory filed similar pictures for Safety Committee meetings on August 8, 2018 and November 14, 2017. [HSE.1]
5. Three out of thirteen electricians are not qualified as they do not have licenses issued by the proper government authorities. [HSE.1]
6. The factory did not have a health check certificate available for the childcare worker. [HSE.1]

Local Law or Code Requirement

FLA Workplace Code (Employment Relation Benchmark ER.31; Health, Safety and Environment Benchmarks HSE.1 and HSE.12).

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Obtain competency certificate for the third party stability inspector. 2. Submit Health and Safety procedures showing reproductive health protection policy. Submit emergency evacuation plan. Define safety procedures for workers in confined spaces, for example underground water tank. Provide written guidance for external contractors/service providers. 3. Complete risk assessment for fire, chemical and electrical risks. Include number of workers impacted, frequency, probability or severity of accidents or injury. Define engineering or administrative control (Training) to reduce risk. 4. Provide proof of safety committee meeting. 5. Provide electrician licenses. 6. Provide health check record for child care worker.

Planned completion date

11/14/18

Company Action Plan Update

1. Work in progress - to be completed April 30, 2019
UPDATE 04012019: Competency certificate attached
2. Health and Safety procedures show reproductive health protection policy. Other items to be completed April 30, 2019.
UPDATE 04012019: Emergency evacuation plan and safety procedure attached
3. Updated risk assessment report completed and attached. Other items to be completed April 30, 2019.
UPDATE 04012019: Accident/injury training attached.
4. Safety committee meeting minutes conducted Dec 3, 2018 attached.
5. One of 13 electricians has license. Balance to be licensed by government by May 31, 2019.
UPDATE 06302019: Complete and attached.
6. Child care attendant health certificate attached.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not inspected the fire pump since March 14, 2018, according to inspection records. [HSE.5]
2. A hose reel inspection conducted in September 2018 confirms all gate valves are listed as "not ok" in the report. The information

maintained did now allow confirmation that concerns were addressed. [ER.2, HSE.5]

3. The factory has not installed emergency lights above the work area, the canteen, or the staircase exits. In some work areas, only standard light bulbs are installed. [HSE.5]
4. Two exit routes in the fabric storage area on the second floor of Building Two are blocked with metal beams. [HSE.5]
5. Approximately 15% of the sewing section work areas are congested with garment bins and tables. Several workers sitting on the inner side were caged in their work stations by tables on one side and a coworker on the other side.[HSE.5]

Local Law or Code Requirement

FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1 and HSE.5); Bangladesh Factories Rules 1979 Section 51.

Recommendations for Immediate Action

1. Check fire pumps periodically and maintain updated logs.
2. Review inspection reports of hose reels and record corrective actions taken.
3. Install industrial emergency lights above exits from work areas, canteen, and on most staircase landings.
4. Change evacuation routes to avoid the metal beams.
5. Declutter work areas and ensure passages are clear at all times.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Check fire pumps periodically and maintain updated logs.
2. Review inspection reports of hose reels and record corrective actions taken.
3. Install industrial emergency lights above exits from work areas, canteen, and on most staircase landings.
4. Change evacuation routes to avoid the metal beams.
5. Declutter work areas and ensure passages are clear at all times.

Planned completion date

11/14/18

Company Action Plan Update

1. Daily checking fire pumps. Also maintaining logs that are attached with pump and hose reel box. 2. Daily checking fire pumps. Also maintaining logs that are attached with pump and hose reel box. 3. Already Installed industrial emergency lights in mentioned /suggested areas.
4. Rerouted and remarked evacuation routes in all applicable locations throughout the factory. 5. All passages have been cleared in the facility.

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not provided a spill response kit in the diesel storage area near the power generator. Oil stains were seen on walls, floor, and pipeline carrying diesel to the power generator. The factory has not defined procedures to dispose of contaminated sand in storage areas under the chemical containers. The factory has not provided a secondary container for two diesel barrels (200 liters each) stored outside. [HSE.9]
2. A worker distributing chemicals from the chemical storage area was using a cloth mask and was not aware of the hazards of using a cloth mask instead of a respiratory mask. [HSE.7]

Local Law or Code Requirement

Bangladesh Factories Rules (1979) Section 42; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.7 and HSE.9)

Recommendations for Immediate Action

1. Provide spill response kit near diesel storage area.
2. Provide and educate workers handling chemicals on appropriate mask use.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Provide spill response kit near diesel storage area.
2. Provide and educate workers handling chemicals on appropriate mask use.

Planned completion date

11/14/18

Company Action Plan Update

1. We have provided spill response kit in diesel storage area.
For your info we have kept "SAND" inside the spill response kit.
2. We are providing PPE Training once a month for the use of appropriate mask to handle chemicals.

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has only provided eye shields to 30% of snap button machine operators. [HSE.14]
2. The factory has not provided gloves to workers handling denim in the scrapping section, and blue dye was on their hands. [HSE.7]
3. The factory has not provided aprons to workers in the washing section.[HSE.7]
4. The factory has not provided safety shoes to maintenance workers. [HSE.7]
5. The factory has not provided aprons or shoes to workers in the Potassium Permanganate (PP) spray section. [HSE.7]
6. Few workers in the scrapping section were using provided gloves. [HSE.8]
7. Most workers on over-lock machines were not using eye shields and some were not using dust masks. [HSE.8]
8. One cutting machine operator did not use mesh gloves while using the cutting machine.[HSE.8]
9. The factory-provided mesh gloves for cutting machine operators are too large. [HSE.7]
10. Some workers in the washing section were not using shoes. [HSE.8]
11. Cloth masks are provided to workers in the washing section and chemical handling areas. [HSE.7]
12. The factory does not provide ear plugs to embroidery or sewing machine operators. [HSE.7]

Local Law or Code Requirement

Bangladesh Factories Rules (1979) Sections 42 and 49; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.7 and HSE.8)

Recommendations for Immediate Action

1. Provide eye shields to snap button machine operators.
2. Provide gloves to denim fabric handlers.
3. Provide water resistant aprons to washing section workers.
4. Provide safety shoes to maintenance workers.
5. Provide aprons, gloves, and shoes to Potassium Permanganate (PP) spray section workers. Educate workers in this section on the importance of wearing gloves on both hands.
- 6 . Educate and monitor use of gloves by workers in scrapping section.
7. Educate and monitor use of eye shields and dust masks by over lock machine operators.
8. Educate and monitor use of mesh gloves by cutting machine operators.
9. Provide appropriately sized mesh gloves to cutting machine operators.
10. Educate and monitor shoe use by washing section workers.
11. Replace cloth masks with appropriate mask for workers in washing section and chemical handling areas.
12. Provide ear plugs to embroidery operators and sewing machine operators working near embroidery machines.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Provide eye shields to snap button machine operators.
2. Provide gloves to denim fabric handlers.
3. Provide water resistant aprons to washing section workers.
4. Provide safety shoes to maintenance workers.
5. Provide aprons, gloves, and shoes to Potassium Permanganate (PP) spray section workers. Educate workers in this section on the importance of wearing gloves on both hands.
- 6 . Educate and monitor use of gloves by workers in scrapping section.
7. Educate and monitor use of eye shields and dust masks by over lock machine operators.
8. Educate and monitor use of mesh gloves by cutting machine operators.
9. Provide appropriately sized mesh gloves to cutting machine operators.
10. Educate and monitor shoe use by washing section workers.
11. Replace cloth masks with appropriate mask for workers in washing section and chemical handling areas.
12. Provide ear plugs to embroidery operators and sewing machine operators working near embroidery machines.

Planned completion date

11/14/18

Company Action Plan Update

1. Provided eye shields to snap button machine operators.
2. Provided gloves to denim fabric handlers.
3. Provided water resistant aprons to workers to washing section workers.
4. Provided safety shoes to maintenance workers.
5. Provided aprons, gloves, and shoes to Potassium Permanganate (PP) spray section workers. Trained workers in this section on the importance of wearing gloves on both hands.
6. Providing PPE Training once a month for the use of gloves by workers in scrapping section.

7. Providing PPE Training once a month for the use of eye shields and dust masks by over lock machine operators.
8. Providing PPE Training once a month for the use of mesh gloves by cutting machine operators.
9. Provided appropriate mesh gloves to cutting machine operators.
10. Providing PPE Training once a month for the use of shoes by washing section workers
11. Replaced cloth masks with appropriate mask for workers in washing section and chemical handling areas.
12. Provided ear plugs to embroidery operators and sewing machine operators working near embroidery machines.

FINDING NO.17

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not conducted an asbestos exposure assessment. Asbestos is currently used in the insulation of the steam pipes. [HSE.1]
2. Lint was noted on electrical wiring in work areas, steam pipes, fans, lights, and electric cables connecting sewing machines with the main power source. [HSE.13]
3. The water tank, a confined space near the fire pump room, is not marked or covered to prevent accidents. The cover over the pit for the submersible pump was damaged. [HSE.1, HSE.14]
4. The factory has no hand rail on the ladder used to access the water tank on the roof. [HSE.1, HSE.14]
5. The bathrooms do not have soap or a hand dryer. [HSE.19]
6. Four of the nine food handlers were not using nose masks, seven in nine food handlers were not wearing an apron. Workers were seen using their hands while serving themselves from the communal bowl of rice. [HSE.22]
7. The factory first aid kits do not include gloves. [HSE.18]
8. The flow of water in the canteen sinks was not strong due to an inadequate supply of water. [HSE.19]
9. Food was left uncovered prior to start of the lunch break. [HSE.22]
10. The dining areas do not have fly or insect traps. [HSE.19, HSE.22]
11. The clinic did not have an inspection table or oxygen cylinder. [HSE.18]
12. Childcare is not provided, per legal guidelines. Moreover, there is no open play area or a uniform for the attendant. [HSE.27]
13. There is no weight limit posted near the elevators, and there are no signs to distinguish passenger from cargo elevators. [HSE.14]
14. Third party service providers inspect the elevators. The factory maintains reports to show the cargo and passenger elevators are inspected every month. One report is kept for both elevator inspections. There is no signed contract with the service provider or a competency certificate for the inspectors available for review. [HSE.14]
15. Eleven of twelve dryers do not have an automatic stop option installed, and the drums continue to rotate when the doors are open. All three hydro-extractors do not have locking lids, so the lids can be opened when the drums rotate at high speeds. When the machine is operating, the automatic cut-off arrangement cuts off the power supply to the machine, but it takes over 20 minutes for the rotating drum to stop. [HSE.14]
16. Sewing machine operators have pushed needle guards upwards or sideways, rendering them ineffective in preventing injury. [HSE.14]
17. The factory provides no anti-fatigue mats to standing workers. [HSE.17]
18. The factory provides no lifting belts to workers loading or unloading. [HSE.17]
19. The factory has not marked vehicle movement areas or traffic lanes, or provided driving aids, like reflectors and mirrors, inside the factory compound. [HSE.1]

Local Law or Code Requirement

Recommendations for Immediate Action

1. Conduct asbestos exposure assessment in work areas.
2. Clean lint in work areas, on electrical wiring, steam pipes, electric cables connecting sewing machines with the main power source, fans, and lights, and maintain lint-free at all times.
3. Mark and cover confined spaces, including the water tank, near the fire pump room to prevent accidents. Replace damaged cover installed on pit of submersible pump.
4. Install hand rail on ladder for the water tank on the roof.
5. Provide soap and hand dryers in all bathrooms.
6. Educate and monitor nose mask, glove, and apron usage by food handlers. Educate workers on utensil use.
7. Provide gloves in first aid kits.
8. Monitor and ensure adequate flow of water supply in taps in dish washing area in canteen.
9. Ensure food is kept covered before meals.
10. Install fly and insect traps in dining areas.
11. Provide inspection table and oxygen cylinder in the health clinic.
12. Provide open play area in childcare room and uniform to attendant.
13. Display weight limit near elevators and post signs to indicate cargo and passenger elevator.
14. Maintain separate inspection reports for elevators. Procure a signed agreement with the third party service provider and a competency certificate for the elevator inspectors.
15. Install automatic stop arrangements on eleven of twelve dryers, and locking arrangement for the lids on all three hydro extractors.
16. Install appropriate needle guards on sewing machines.
17. Provide anti-fatigue mats to standing workers.
18. Provide lifting belts to workers who load and unload cargo.
19. Mark vehicle movement areas and traffic lanes and provide driving aids like reflectors and mirrors inside the factory compound.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Conduct asbestos exposure assessment in work areas.
2. Clean lint in work areas, on electrical wiring, steam pipes, electric cables connecting sewing machines with the main power source, fans, and lights, and maintain lint-free at all times.
3. Mark and cover confined spaces, including the water tank, near the fire pump room to prevent accidents. Replace damaged cover installed on pit of submersible pump.
4. Install hand rail on ladder for the water tank on the roof.
5. Provide soap and hand dryers in all bathrooms.
6. Educate and monitor nose mask, glove, and apron usage by food handlers. Educate workers on utensil use.

7. Provide gloves in first aid kits.
8. Monitor and ensure adequate flow of water supply in taps in dish washing area in canteen.
9. Ensure food is kept covered before meals.
10. Install fly and insect traps in dining areas.
11. Provide inspection table and oxygen cylinder in the health clinic.
12. Provide open play area in childcare room and uniform to attendant.
13. Display weight limit near elevators and post signs to indicate cargo and passenger elevator.
14. Maintain separate inspection reports for elevators. Procure a signed agreement with the third party service provider and a competency certificate for the elevator inspectors.
15. Install automatic stop arrangements on eleven of twelve dryers, and locking arrangement for the lids on all three hydro extractors.
16. Install appropriate needle guards on sewing machines.
17. Provide anti-fatigue mats to standing workers.
18. Provide lifting belts to workers who load and unload cargo.
19. Mark vehicle movement areas and traffic lanes and provide driving aids like reflectors and mirrors inside the factory compound."

Planned completion date

11/14/18

Company Action Plan Update

1. Work in Progress- to be completed May 30, 2019. Update 07/29/2019- asbestos assessment complete and uploaded. 2. Work in Progress- to be completed May 30, 2019. Update 07/29/2019-lint has been removed from all mentioned locations and cleaning is conducted daily. cleaning register attached. 3. covered confined space (water tank) near fire pump room to prevent accidents. complete 4. Already Installed hand rail on ladder that used for accessing the water tank on the roof. complete 5. Already provided soap and hand dryers in all bathrooms. complete 6. providing regular training to food handler how to use nose mask, glove, and apron. Also giving training to the workers on utensil use. complete 7. Provided gloves in first aid kits. complete 8. Ensured adequate water supply in dish washing area in canteen. complete 9. Already ensured food is kept covered before meals. complete 10. Already installed fly and insect traps in dining areas. complete 11. Work in Progress- to be completed May 30, 2019. UPDATE 04012019: inspection table attached. UPDATE 06302019: oxygen cylinder attached. 12. Provided open play area in childcare room and uniform to attendant. complete 13. Displayed weight limit near elevators and posted signs to indicate cargo and passenger elevator. complete 14. Maintaining separate inspection reports for elevators. Also, procured a signed agreement with the third party service provider and a competency certificate for the elevator inspectors. complete 15. Work in Progress- to be completed May 30, 2019. UPDATE 04012019: complete and 2 files attached. 16. Installed needle guards on sewing machines. complete 17. Already provided anti-fatigue mats to standing workers. complete 18. Work in Progress- to be completed May 30, 2019. UPDATE 05122019: lifting belt example attached. 19. Vehicle movement areas already marked and will provide traffic lanes and provide driving aids like reflectors and mirrors inside the factory compound by May 30, 2019. UPDATE 04012019: complete and attached. UPDATE 05122019: traffic signage attached. UPDATE 06302019: Traffic lanes and reflectors/mirrors to be complete July 31, 2019. UPDATE 7/29/19-signage and traffic lane photos attached. complete.

FINDING NO.18

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. The factory training calendar includes training dates for every month of 2018 on 19 different topics. However, this calendar does not include the number of workers trained, so the assessors cannot confirm if 100% of the workers received training at least once a year. [ER.1]

2. The factory has not provided specific training to the HR department, managers, or workers on Workplace Conduct & Discipline. [ER.1.2 and ER.27]

3. The factory does not provide specific training on Recruitment, Hiring & Personnel Development, Freedom of Association & Industrial Relations, Hours of Work, Compensation, Termination & Retrenchment, and Environmental Protection to supervisors or workers. Some material is covered during orientation, but it is not provided to all employees. In the past 12 months, the factory has conducted the following training:

- i. Grievance system and disciplinary procedures, for 289 of 5931 workers
- ii. Personal Protective Equipment, for 402 of 5931 workers
- iii. Maternity benefits, for 90 of 3794 female workers
- iv. General Health and Safety Awareness (hygiene), for 397 of 5931 workers
- v. Occupational Health and Safety, for 307 of 5931 workers. [ER.15, ER.17]

4. The factory conducts no specific workplace training to workers with specialized responsibilities.[ER.1.2]

Local Law or Code Requirement

FLA Workplace Code (Employment Relation Benchmarks ER.1, ER.15, ER.17, and ER.27)

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 1. include number of trainee in the training calendar
- 2. provide specific training to the HR Dept.
- 3. provide training in the mentioned departments
- 4. conduct specific workplace training to workers with specialized responsibilities, like PPE training.

Company Action Plan Update

- 1. Included number of trainees in the training calendar. # of trainees circled in red on attachment.
 - 2. Provided specific training to the HR Dept.
 - 3. Already provided training in the mentioned department as per requirement.
 - 4. Conducted specific workplace training to workers with specialized responsibilities like PPE training.
- 19 different training topics are conducted monthly.