



COMPANIES: The Northwest Company LLC.

COUNTRY: India

ASSESSMENT DATE: 09/16/19

ASSESSOR: Insync Global

PRODUCTS: Other

NUMBER OF WORKERS: 120

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	10
Hours of Work	8
Employment Relationship	53
Health, Safety, and Environment	53
Harassment and Abuse	2
Nondiscrimination	3
Freedom of Association	7

Findings and Action Plans

FINDING NO.1

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

The factory does not have written policies or procedures on personnel development, performance reviews including promotion, demotion or job reassignment, nondiscrimination, harassment & abuse, forced labor, child labor, hours of work, termination & retrenchment, compensation, workplace conduct and discipline, grievance systems, or health, safety & environmental protection.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship benchmarks ER.25.3.1, ER.27.1, ER.28.1, ER.29.1, ER.30.1, ER.30.1.1, ER.31.1, ER.32.1; Nondiscrimination benchmark ND.2.1; Harassment & Abuse benchmark H/A.1, Forced Labour Benchmark F.1, Child Labor Benchmark CL.1, Hours of Work Benchmark HOW.1.1, Compensation Benchmark C.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Now we have Recruitment, Hiring & Personnel Development-
policies attached for
procedures on personnel development ,
performances reviews including promotions,
nondiscrimination's , harassment & abuse,
forced labor, child labor, house of work,
termination & retrenchment, compensation,
workplace conduct and discipline, grievance
systems, or health, safety & environmental
protection.

FINDING NO.2

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Review Process (Macro)

Finding Explanation

The factory does not periodically review its policies and procedures.

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmark ER 1.3)

COMPANY ACTION PLANS

Action Plan no 1.

Description

Now we have Recruitment, Hiring & Personnel Development-
policies attached for
procedures on personnel development ,
performances reviews including promotions,
nondiscrimination's , harassment & abuse,
forced labor, child labor, house of work,
termination & retrenchment, compensation,
workplace conduct and discipline, grievance
systems, or health, safety & environmental
protection.

Company Action Plan Update

see above

Action Plan no 2.

Description

Now we have Recruitment, Hiring & Personnel Development-
policies attached for
procedures on personnel development ,
performances reviews including promotions,
nondiscrimination's , harassment & abuse,
forced labor, child labor, house of work,
termination & retrenchment, compensation,
workplace conduct and discipline, grievance
systems, or health, safety & environmental
protection.

Company Action Plan Update

see above

FINDING NO.3

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Training (Macro)

Finding Explanation

1. Factory management conducts no trainings for supervisors on any employment functions. [ER.17.1]
2. Except for trainings on health, safety and environmental concerns, workers are not provided trainings on other Employment Functions. [ER.16.1]
3. In the past 12 months, 23% of workers were trained on fire safety, 27% of workers were trained on the use of personal protective equipment, 16% of workers were trained on chemical management, 1.3% of workers were trained on machine safety, 23% of workers were trained on first aid procedures, while no training was conducted on ergonomics or specifically for HSE committee members. [ER.16.1]
4. The factory does not conduct any training on worker reproductive health by minimizing their exposure to workplace hazards. [ER.16.1]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.16.1 and ER.17.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

now training provide for
Factory management conducts no training for
supervisors on employment functions.

now training provide for
trainings on health, safety and
environmental concerns, workers are not provided
trainings on other employment functions.

trained on the use of personnel protective
equipments,
chemical management,
machine safety,
trained on first aid procedures,
ergonomics

Company Action Plan Update

see above

FINDING NO.4

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The six-month probationary period can be extended by six months. [C.3]

2. The factory does not follow a defined system for orientation. Orientation training content is not documented and workers do not receive documentation that substantiates all topics covered during orientation. The factory does not maintain a list of new workers participating in the orientation or collect signatures to determine attendance or understanding. [ER.15]
3. Management is not aware of the FLA, its code elements, or employment functions. [ER.1]
4. Job descriptions are not provided to the HR team. [ER.1]
5. The factory does not have written procedures for workers who allege violations of employment functions. [ER.1]
6. Workers are not consulted in decision-making processes about the workplace or working conditions. [ER.25.2]
7. The factory's job applications ask required questions on religion and marital status. [ND.2.1]
8. The factory does not have a defined process to promote workers. Management stated that workers are promoted based on verbal recommendations or through email from the production team to HR. There is no system to document evaluations or for worker feedback. The factory does not provide letters to workers to communicate changes in wages following a promotion; this is communicated verbally. [ER.30.1]
9. When the female security guard is not present, one female staff member from the HR Team performs security duties. [ER.2]
10. The factory does not have a written agreement with a contractor. [ER.2]

Local Law or Code Requirement

Industrial employment (standing orders) Rules 1946- Rule 2-C under schedule 1; FLA Workplace Code (Compensation Benchmark C.3, Employment Relationship Benchmarks ER.1, ER.2, ER.15, ER.16, ER.25.2, and ER.30.1 and Nondiscrimination Benchmark ND.2.1).

COMPANY ACTION PLANS

Action Plan no 1.

Description

probationary period as per our standing orders
approved by labor commissioner
The factory now follow a defined system
for orientation.
now we have conducted FLA code training

Job descriptions provided to the HR team.
detail procedure in standing orders
for workers who allege violations of employment functions.
now we have process to promote workers
female security guard provided
we have written agreement with all contractors

Company Action Plan Update

see above

FINDING NO.5

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Recruitment, Hiring & Personnel Development

Finding Explanation

1. The appointment letter does not specify whether the wage amount is an hourly or daily rate. [ER.2]
2. Daily rated workers are paid on a monthly basis. For at least eight of fourteen workers hired in July 2017, their daily wages were INR 385 (INR 10010 per month). This practice does not match the management statement that workers earning less than INR 10000 are hired on daily basis and paid monthly. [ER.2]

Local Law or Code Requirement

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

Recommendations for Immediate Action

1. Wage amount recorded on appointment letter should define if the wage payable is monthly, hourly rate or daily rate.
2. Provide accurate information on wage payable in appointment letter as per wage notified by local government authorities

COMPANY ACTION PLANS

Action Plan no 1.

Description

Now facility will started all workers are monthly basis paying wef from 01.11.2019

Company Action Plan Update

see above

FINDING NO.6

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Workplace Conduct & Discipline

Finding Explanation

1. The Internal Complaints Committee (ICC) has not been formed, nor a presiding officer designated. A junior-level employee designated to conduct the meetings has only worked at the factory for three months. Signatures of the NGO representative and members in the committee do not match the Prevention of Sexual Harassment (POSH) meeting minutes conducted in June, July, and August 2019. [H/A.1]
2. Penal consequences of workplace sexual harassment are not posted. [H/A.1]
3. The factory imposes monetary fines on contractors for production errors in Cutting, Sewing, and Packing processes. Management stated this fine has not yet been imposed on contractors. [H/A.2]

Local Law or Code Requirement

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, Section 4 & 19; FLA Workplace Code (Harassment and Abuse Benchmarks H/A.1 and H/A.2).

Recommendations for Immediate Action

1. Form an Internal Complaints Committee (ICC).
2. Post penal consequences of sexual harassment at the workplace.
3. Review factory procedure of imposing monetary fines on contractors for production errors and establish effective systems to ensure monetary fines are not imposed on workers by contractors.

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 1.The internal complaints committee (ICC) has now been formed
- 2.Penal consequences of workplace sexual harassment are now posted
- 3.The factory never imposes monetary fines on contractors for production errors in cutting sewing

Company Action Plan Update

see above

FINDING NO.7

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Grievance System

Finding Explanation

1. Grievances are not documented. [ER.2]
2. Worker representatives on the grievance committee are nominated by factory management. The committee met in July 2018 and August 2019. The only concern raised in both meetings was related to workers opening bank accounts to transfer wages. [FOA.10]

Local Law or Code Requirement

FLA Workplace Code (Employment Relationship Benchmarks ER.2 and Freedom of Association benchmark FOA.10)

COMPANY ACTION PLANS

Action Plan no 1.

Description

All Grievances are now documented
and meeting conducting on regular intervals

Company Action Plan Update

see above

FINDING NO.8

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Hours of Work

Finding Explanation

1. The factory has not used the legally required document or obtained approval from the labor department on multiple shift work. The shift approval form was not available to verify approval of working shifts. [HOW.1]
2. A compensatory rest day is not provided when a national holiday happens to fall on a worker's rest day. [HOW.1]

Local Law or Code Requirement

Gujrat factories rules 1963- Rule 87, Factories act 1948- Section 52; FLA Workplace Code (Hours of Work Benchmark HOW.1)

Recommendations for Immediate Action

1. Obtain approval to work in multiple shifts from labour department and maintain a shift approval form.
2. Provide compensatory rest day to workers when a holiday coincides with their rest day.

COMPANY ACTION PLANS

Action Plan no 1.

Description

- 1.The factory have applied for shift approval to labor department.
- 2.we are providing rest as per standing orders as approved by labor commissioner

Company Action Plan Update

see above

FINDING NO.9

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Compensation

Finding Explanation

1. The factory has not obtained written consent from workers for taking deductions from their wages towards food, factory provided transport, or dormitory maintenance. [C.11.1]
2. Management representatives sign pay records for contracted workers but do not confirm accurate or timely payment. For example, one worker employed through a contractor was paid INR 183 (USD 2.65) as wages for August 2019 instead of due amount of INR 4660.88 (USD 67.54) and the pay sheet was signed by factory management. [C.1]
3. The factory only provides wage slips after payment. [C.1]
4. Wages are paid between the 7th and 10th day following the wage period. Management could not provide any evidence to confirm the transfer of wages to worker bank accounts. [C.4]
5. Unused earned leave does not carry over to the following year as legally required and wages for unused leave are not paid. [C.1]
6. Workers earning less than INR 10000 (USD 144.92) per month are hired on a daily basis and paid monthly. These workers are not paid for rest days. [C.1]
7. Review of pay records from August 2019 of contracted canteen employees show the canteen supervisor was paid INR 15050 (USD 218.11), the cook was paid INR 8650 (USD 125.36) and a helper was paid INR 15100 (USD 218.84). Other helpers were paid INR 8214 - 8550 and a cook INR 8650. Management could not explain why the helper was paid more than the Supervisor and Cook. Improper payments may impact benefits of the Provident Fund. [C.1]

Local Law or Code Requirement

Contract Labour Central Rules 1971- Rule 73; Minimum Wages Central Rules- Rule 26(2); Payment of Wages Act, 1936-Section 5(1); Factories Act 1948- Section 79(5) read with section 80; FLA Workplace Code (Compensation Benchmarks C.1, C.4 and C.11.1)

Recommendations for Immediate Action

1. Obtain written consent for any wage deductions.
2. Management representatives needs to confirm accurate and timely payment of wages to contracted workers.
3. Provide worker wage slips prior to payment of wages as legally required.
4. Pay wages before end of 7 working days post end of wage period every month.
5. Unused earned leave should be carried over to the following year as legally required.
6. Ensure benefit of rest days is provided to all workers.
7. Ensure appropriate wages are paid to all workers.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. we obtained written consent from workers for taking deductions from their wages towards food, factory provided transport, dormitory maintenance as all these we provide them at subsidies cost .
2. Management representatives sign pay records for contracted workers and confirm accurate or timely payment.
3. Now we provides wages slips before payment.
4. Wages are paid between the 7th and 10th day in Bank account.
5. Now made a leave policy and unused leaves are carried over to next year.
6. Now we are hiring all workers on monthly basis only.

Company Action Plan Update

see above

FINDING NO.10

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Termination & Retrenchment

Finding Explanation

1. The resignation date was not recorded on 3 out of 5 sampled resignation letters reviewed, so the actual date of termination of employment and calculation of wages cannot be verified. [ER 32.2]
2. Payment date is not recorded on receipt of terminal dues, so compliance with legally-defined timelines for payment of terminal dues cannot be verified. Wages for April 2017 were not paid until June 21, 2017 and two of three workers had resigned on May 4, 2017 and April 20, 2017. Samples reviewed from 2019 revealed that settlement vouchers were signed by management six days following termination and in samples from 2018, settlement vouchers were signed by management 80 days after the date of termination. [ER.32.2]

3. Time cards are not maintained with pay records for all 5 sampled workers, so accuracy of wages calculated for days worked prior to termination could not be verified. [ER.32.2]
4. A worker resigned on May 4, 2017, but the leave date on the calculation was May 1, 2017. [ER.2]
5. The certificate for one of the five sampled workers was issued on April 10, 2017, while the full and final settlement voucher states the leave date as March 13, 2017. [ER.2]

Local Law or Code Requirement

Industrial Employment (Standing Orders) rules ,1946- section 13, Factories Act 1948- section 79(3) read with section 80 ; FLA Workplace Code (Employment Relationship Benchmarks ER.2 and ER 32.2).

Recommendations for Immediate Action

1. Ensure date of resignation is recorded on resignation letters provided by workers.
2. Record date of payment on terminal dues receipt and ensure terminal dues are paid within 48 hours of termination date.
3. Maintain time cards with pay records for terminal dues.
4. Maintain accurate information in personnel records for all workers.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1.Now resignation date on resignation letter and time records maintained for all employees

Company Action Plan Update

see above

FINDING NO.11

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Environmental Protection

Finding Explanation

1. The factory does have an environmental emergency plan or procedures to report environmental emergencies to concerned authorities. [HSE.2 and HSE.5.4]
2. Containers for non-functional tube lights, used electrical cords, empty paint containers, etc. are not properly labeled. [HSE.9.1]

3. Authorized waste collector records are not available, so appropriate waste disposal methods and practices could not be determined. [HSE.4]
4. The factory has not maintained reports on air emissions for the stacks to both boilers. [HSE.4]
5. The factory does not have permission to contaminate the soil or groundwater.[HSE.4]

Local Law or Code Requirement

FLA Workplace Code (Health, Safety and Environmental Benchmarks HSE.2, HSE.4, HSE.5.4, HSE.9.1)

COMPANY ACTION PLANS

Action Plan no 1.

Description

1.Now we have conducted environmental emergency plan

2Now all Containers , for non -functional tube lights .used electrical cords ,empty paint conditions, etc are properly labeled

3.Authorized waste collector records are now available

4.methods and practices could could not be determined
now we maintained reports on air emissions for stacks for boilers.

Company Action Plan Update

see above

FINDING NO.12

SUSTAINABLE IMPROVEMENT REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. The factory has not conducted a fire risk assessment. [HSE.2]
2. The factory does not keep a record of work-related injuries. [HSE.3.1]
3. The factory has not conducted a risk assessment for worker protection or thermal comfort. [HSE.1]
4. The factory does not provide safety information to contractors. [HSE.1]
5. Maintenance reports for vehicles used by the factory (buses, fork lift trucks) and the ventilation system installed in the factory were

not available for review. Further maintenance records for electrical safety were also not available for review. [HSE.13]
6. Competency certificates are not kept for external engineers or inspectors who test air compressors, forklift vehicles, cranes, chain pulleys, hydraulic lifts, or building stability. [HSE.1]

Local Law or Code Requirement

Factories Act 1948 Section 7 A (2b) and Gujrat Factories Rules 1963 Rule 2A; FLA Workplace Code (Employment Relationship Benchmark ER.16.1, Health, Safety and Environment Benchmarks HSE.1, HSE.2, HSE.3.1 and HSE.13).

COMPANY ACTION PLANS

Action Plan no 1.

Description

now we conducted fire risk assessment
record of work-related injuries now maintained.
we have conducted a risk assessment for worker protection
we provide safety information to contractors.
records for electrical safety now being maintained

Company Action Plan Update

see above.

FINDING NO.13

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Aisle markings are faded in the packed goods warehouse and the integrated management system (IMS) stores. Evacuation routes are not marked in the yarn store. [HSE.5.1]
2. A fire evacuation drill was conducted on June 3, 2019 for workers from two shifts: 11pm to 7am and 7am to 3pm. Workers on the two other shifts were not included. [HSE.5.2]
3. Emergency alarms do not have battery back-up, so alarms do not operate without electricity. The visual fire alarm system for the computer embroidery department is not visible within the department's section. [HSE.5.1, HSE.5.3]
4. Four exits from one side of the Cutting-Sewing-Packing (CSP) section open to a road. This road is blocked which restricts access to assembly areas for workers from this department. Access to assembly areas from the other six exits are clear. Two of the exits are not marked in the main materials store near the IMS stores and CSP section. [HSE.5.1]
5. Lint had accumulated on fans in the warping section and the gray fabric dispatch stores. [HSE.5.1]

6. The factory fire safety team does not have fire suits, fire extinguishing blankets, fire beaters, or the necessary breathing apparatus. [HSE.6.1]

7. Workers use LPG gas cylinders in the dormitory to cook food. [HSE.5.1]

Local Law or Code Requirement

The Factories Act, 1948 -Section 38 (1 & 2), Gujrat factories rules 1963- Rule 66-A (12)(C),The Factories Act, 1948-Section 38(1b), Factories Act, 1948- Section 7A(2b); FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.5.1, HSE.5.2, HSE.5.3 and HSE.6.1)

Recommendations for Immediate Action

1. Replace faded aisle markings in packed goods warehouse and Integrated Management System (IMS) stores. Mark evacuation all routes.
2. Conduct fire evacuation drill during all shifts.
3. Provide battery back-up for emergency alarms and install visual fire alarm systems for all sections.
4. Maintain clear access to assembly areas from all work areas and mark exits.
5. Keep fans clear of lint build-up.
6. Provide factory fire safety team with necessary firefighting PPE.
7. Provide separate areas for workers to cook food and discourage cooking inside living areas.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Evacuation routes are marked in the yarn store
fire evacuation drill conducting on regular intervals
Emergency alarms have battery back-up
Four exits from one side of the Cutting- Sewing Packing (CSP) section open to a road. This road is blocked which restricts access to assembly areas for workers from this department. Access to assembly areas from the other six exits are clear. Two of the exits are not marked in the main materials store near the IMS stores and CSP section. (HSE.5. 1)
Now The factory fire safety team have fire suits, fire extinguishing blankets, fire beaters

Company Action Plan Update

see above.

FINDING NO.14

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. No female employees are trained in first aid procedures. [HSE.18.2.1]
2. First aid boxes do not contain eyewash lotion or all necessary first aid equipment for sprains (e.g. bandages, sprain ointment, etc.). The doctor in charge of the medical room is not employed full-time, so the medical room is run by a pharmacist. The doctor only visits the medical room two hours per week. The medical room is not equipped with emergency medicine. [HSE.18.3]
3. The medical room is not open during the evening or night shifts, so medical emergencies during these periods are attended to by first aid-trained workers in the factory. [HSE.18.2.1]

Local Law or Code Requirement

Factories Act 1948- Section 45(3), Gujrat Factories Rules 1963- Rule 68U (1)(C), Schedules attached to rule 68-U (1)(b)(i); FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.18.2.1 and HSE.18.3)

Recommendations for Immediate Action

1. Train female workers in first aid procedures.
2. Maintain adequate supplies in first aid boxes at all times and ensure medical room complies with legal requirements.
3. Provide staffed medical facility during all working hours as legally required.

COMPANY ACTION PLANS

Action Plan no 1.

Description

Now 2 female employees trained in first aid procedures.
First aid boxes contain eyewash or all necessary first aid equipment for sprains
The medical room is now open during the evening or night shifts,

Company Action Plan Update

see above

FINDING NO.15

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. Audiometric testing is not conducted once every 12 months for workers in noisy areas. The last test was conducted in 2017. [HSE.1]
2. Tailors in the downgrade section near the packing section use metal stools with no back rests. The work stations for checking and packing are not adjustable in height. Workers in standing positions throughout the factory production areas are not provided with rest areas. [HSE.17.1]
3. Maximum loads are not posted on pallet trucks, overhead cranes, or fork lifts. Forklifts used in the IMS stores are not provided with any audiovisual alarm system. [HSE.14.1]
4. Safe operating instructions are not posted on or near machinery for sizing, warping, or weaving sections or where chain/pulley or overhead cranes are operated. [HSE.14.3]
5. There is no Lock-out / Tag out system in the factory. [HSE.14.1]
6. The floor of the electrical panel section was washed using water and soap. [HSE.13]
7. In the sizing and warping sections, stoppers are not used to prevent spindles from rolling. A locking arrangement is not provided for chains used to carry spindles moved overhead. [HSE.14.1]
8. Workers in these sections are not provided with hard-toe shoes to prevent injuries. [HSE.7]
9. Packed cartons are stored high with no safety fence in the main materials stores near IMS (integrated Management system) stores. [HSE.1]
10. Stagnant water was in an area close to the loading area located near the packed goods warehouse. [HSE.19]
11. Traffic lanes are not marked. Convex mirrors are not installed at blind turns. Reflectors and speed bumps are not provided inside the factory. [HSE.1]

Local Law or Code Requirement

Rule 5 under Operations Involving High Noise Levels of schedule XXIII attached to Gujrat Factory Rules 1963, Factories Act 1948-Section 7A (2b) read with section 44; FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.1, HSE.7, HSE.13, HSE.14.1, HSE 14.3, HSE 17.1, HSE.19)

Recommendations for Immediate Action

1. Conduct audiometry test once every 12 months.
2. Provide appropriate seating arrangements to reduce bodily injury to tailors in downgrade section located near packing section. Work stations utilized for checking and packing should be adjustable in height and provide with rest areas where they can take rest at intervals as legally requirement.
3. Post maximum working loads on pallet trucks, overhead cranes and forklifts. Provide audio and visual alarm on forklifts.
4. Post safe operating instructions on or near machinery in sizing, warping and weaving section and locations with the chain/pulley and overhead cranes.
5. Implement a Lock-out /Tag out system in the factory.
6. Use stoppers in sizing and warping sections. Provide locking arrangement for chains used to carry spindles and provide workers in these sections with hard toe shoes to prevent injuries.
7. Restrict storage height of packed cartons in main materials stores.
8. Ensure there is no stagnant water.

9. Mark traffic lanes inside the factory. Install convex mirrors at blind turns, reflectors and speed bumps.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Audiometric testing is now will be done by 31.01.2020
2. Tailors in the downgrade sections near the packing section use
.Now provided back seat for rest
3. Now maximum load posted all around
Now audiovisual alarm system provided.
4. operating instructions are now posted on all machinery in Hindi
5. now Lock-out / Tag out system implemented
- 6/8. Workers now provided with hard-toe shoes
9. Packed cartons are stored high with safety fence
10. Staganant water now removed from loading area and made dry.
11. Traffic lanes now marked.

Company Action Plan Update

see above

FINDING NO.16

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

1. There is no eye wash station in or near the hydraulic fluid, boiler water softener (Maxgreen 3100 L), or lubricant storage area. [HSE.9.1]
2. MSDS are posted in English but not in the local language in the hydraulic fluid, boiler water softener, and lubricant storage area. [HSE.10]
3. Containers of hydraulic fluid, boiler water softener, and lubricants are not properly labeled. A spill response kit is not provided in the hydraulic fluid, boiler water softener, and lubricant storage area. [HSE.9.1]
4. Entry to the chemical storage area is unrestricted. [HSE 9.1]

Local Law or Code Requirement

Gujrat factories rules- Rule 68-W, 68-Q, Factories act 1948- Section 7A (2b); FLA Workplace Code (Health, Safety and Environment Benchmarks HSE.9.1 and HSE.10)

Recommendations for Immediate Action

1. Provide eye wash station in or near the hydraulic fluid, boiler water softener (Maxgreen 3100 L), and lubricant storage area.
2. Post MSDS in the local language.
3. Label containers appropriately. Provide spill response kits in the hydraulic fluid, boiler water softener, and lubricant storage area.
4. Restrict entry to the chemical storage area.

COMPANY ACTION PLANS

Action Plan no 1.

Description

1. Eye wash station provided near the hydraulic fluid, water softener, lubricant storage area.
2. MSDS are posted in local language in the hydraulic fluid,
3. containers of hydraulic fluid, water softener and lubricants are properly labeled.
4. Entry to the chemical storage area now restricted.

Company Action Plan Update

see above.

IMMEDIATE ACTION REQUIRED

FINDING TYPE: Health & Safety

Finding Explanation

Lint and used thread cones were lying scattered on the floor in the Integrated Management System stores. [HSE.19]
Bathrooms in the Cut, Sew & Pack section had stagnant water on the floor and the restrooms emitted a foul smell. Restrooms were not cleaned effectively; floors and walls were extremely dirty and unhygienic and tobacco pouches were scattered inside. Sinks in the male restrooms were not clean and the restrooms did not have soap or hand drying facilities. [HSE.19]
Dirty, stagnant water and garbage was in front of and behind the dormitory. There is only one door to the dormitory. Workers were cooking food inside their rooms and smoke was prevalent inside. Windows are kept closed and lockers are not provided to workers. [HSE.19]
Gloves, aprons, and nose masks are not used by food handlers or canteen workers. Cooks and dishwashers were wearing open footwear. [HSE.22.1, HSE.7]
Sanitary napkins were not provided in bathrooms. [HSE.1]

Local Law or Code Requirement

Factories act 1948- Section 11, 19, 7A (2b); Model Factories Rules (Rules made as under Section 19(3) and Section 112 of Factories Act 1948); FLA Workplace Code (Health, Safety and Environment benchmarks HSE.1, HSE.7, HSE.19 and HSE.22.1)

Recommendations for Immediate Action

1. Maintain proper housekeeping standards in work and dormitory areas.
2. Maintain clean toilets at all times. Provide adequate hand wash facility, soap and hand drying facilities in restrooms.
3. Maintain areas near the dormitory free of stagnant water. Improve ventilation in dormitory. Provide separate cooking areas for workers. Provide lockers for workers.
4. Monitor use of gloves, aprons and nose masks by food handlers and canteen workers. Provide closed shoes to cooks and dishwashers.
5. Provide sanitary napkins in restrooms.

COMPANY ACTION PLANS

Action Plan no 1.

Description

01- now facility control all used cones storage on safe place.
02- all bathroom & toilet are check & clean daily

3- facility will remove all dirty garbage cane on daily basics & workers control food cooking in side of room

4- Now facility provided all things regarding to daily uses of canteen cook workers
(apren , nose mask,gloove

5.Sanitary napkins are provided in bath rooms.

Company Action Plan Update

all of the above.