



FAIR LABOR  
ASSOCIATION®

## INDEPENDENT EXTERNAL ASSESSMENT REPORT



### Verification Assessment

COMPANIES: Kay & Emms (Pvt) Limited  
COUNTRY: Pakistan  
ASSESSMENT DATE: 10/22/19  
ASSESSOR: Innovatus  
PRODUCTS: Apparel  
NUMBER OF WORKERS: 850

## 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	1
Hours of Work	1
Employment Relationship	16
Health, Safety, and Environment	22
Harassment and Abuse	1
Forced Labor	1
Freedom of Association	2

## Previous Report Findings and Verification Results

### PREVIOUS FINDING NO.1

### IMMEDIATE ACTION REQUIRED

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

#### Finding Explanation

1. The factory has a written policy and procedures for Recruitment & Hiring, but not for Personnel Development. 2. Less than 1% of the factory's workers are disabled, which is less than the local law requirement of 3%. Nor does the factory make the necessary financial contribution in lieu of employing disabled workers. 3. Although there were not any cases of discrimination observed, the job application form includes questions about applicants' religion, marital status, and the number of children & dependents. 4. The factory does not document, in writing, performance reviews, nor is there a system in place for workers to provide feedback on those reviews. 5. There are no written job descriptions for any non-management positions within the factory. 6. The factory does not provide workers with a written copy of the workplace rules and policies. Although the factory previously provided it, they stopped doing so in mid 2015. 7. The factory does not provide workers with letters of employment Urdu; instead the letters are in English. 8. The factory provides employment contract on a simple piece of paper that does not include the name of the factory. Also, there are various signatures on different contracts and therefore it is not clear who in the factory actually has the authority to sign contracts. 9. The factory's procedures on Recruitment, Hiring & Personnel Development do not include guidance on special categories of workers.

#### Local Law or Code Requirement

The Industrial & Commercial Employment (Standing Orders) Ordinance, 1968; FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.3, ER.5, ER.14, ER.25, and ER.29; Nondiscrimination Benchmark ND.2)

#### Root Causes

1. The personal questions on the job application forms are mainly used for data collection and management did not think they were an issue. 2. Management didn't think about potential benefits of having a written personnel development procedure 3. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues. 4. The local authorities do not strictly control the quota for disabled workers and the financial contribution requirements. 5. The revision of policy and procedures is ongoing and management did not want to

distribute the old policy and procedures to workers during orientation. 6. Since factory management has not experienced any objections to the performance evaluation results, they did not think that they needed to keep documentation of this process. 7. Problems on the quality of documentation are mainly due to the high turnover rate of the workforce and ignorance of the HR staff due to heavy workload. 8. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections. 9. The factory does not have an effective internal audit system. 10. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

#### Recommendations for Immediate Action

Remove questions regarding marital status, number of kids & dependents, and religion, which may lead to discrimination during hiring process, from the job application forms.

#### FLA's Recommendations for Sustainable Improvements

1. Ensure that number of disabled workers is in line with local law requirement of 3% or financial contribution being paid in case of failure of reaching this quota for some reason 2. Ensure that performance reviews are documented in writing and there is a system in place for workers to provide feedback on those reviews 3. Ensure that there is a written procedure on personnel development which covers all necessary elements including guidance on special categories of workers 4. Prepare written job descriptions for all positions within the factory. 5. Provide employment letters to workers in local language, Urdu. 6. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings. 7. Review and revise the existing internal audit tool to ensure that issues related to labor are covered. 8. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars. 9. Clearly define the name and position within management who is responsible for Recruitment & Hiring. 10. Prepare an employment contract template and ensure it includes, at minimum a company logo, the company name, the company address and contact information, and the signatures of those responsible for Recruitment & Hiring.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

Company has removed questions regarding marital status, number of kids & dependents, and religion, which lead to discrimination during hiring process, from the job application forms.

#### Planned completion date

04/04/18

#### Company Action Plan Update

Form has established accordingly.

### Action Plan no 2.

#### Description

1. Company is planned to ensure that number of disabled workers is in line with local law requirement of 3% or financial contribution being paid in case of failure of reaching this quota for some reason
2. Company planned to ensure that performance reviews will be documented in writing and there will be a system in place for workers to provide feedback on those reviews
3. Company will ensure that there is a written procedure on personnel development which covers all necessary elements including guidance on special categories of workers
4. Company has prepared written job descriptions for all positions within the factory.
5. Company has provided employment letters to workers in local language, Urdu.
6. Company has conducted a training-needs assessment for EHS committee members, management, and the general workforce & revised the existing training plan in light of the assessment results and deliver these trainings.
7. Company has reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.
8. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

9. Company is now clearly defines the name and position within management who is responsible for Recruitment & Hiring.

10 We will prepare an employment contract template and ensure it includes, at minimum a company logo, the company name, the company address and contact information, and the signatures of those responsible for Recruitment & Hiring.

Planned completion date

04/04/18

## VERIFICATION RESULT

### Finding Status

Partially Remediated

### Remediation Details

1. Partially Remediated: The policy is generic, not company-specific. Management needs to make it relevant to company needs and in accordance with implementation.
2. Remediated: According to documentation review, factory makes the required contribution.
3. Remediated: The job application form does not contain any such questions anymore.
4. Partially Remediated: There is a performance evaluation system for workers and records kept, however, there is no feedback system in place to notify the results to workers. The factory needs to update the procedures.
5. Remediated: Job descriptions now exist for non-management positions.
6. Not Remediated: According to worker interviews, the factory still does not provide workers with a copy of the workplace rules or the employee handbook.
7. Remediated: Employment contracts are in the workers' local language.
8. Remediated: Employment contracts are on company letterhead and management signatures were found consistent across the sample taken.

### Local Law or Code Requirement

The Industrial & Commercial Employment (Standing Orders) Ordinance, 1968 (Section 2-A); FLA Workplace Code (Employment Relationship Benchmarks ER.1, ER.25, and ER.29)

### Recommendations for Immediate Action

1. Provide copies of the workplace rules and handbook to all workers.

## PREVIOUS FINDING NO.2

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Compensation

#### Finding Explanation

1. The factory does not provide piece-rate workers with gratuity payment upon their termination or resignation. Currently, only salaried workers receive the gratuity payment.
2. Time keeping and payment system issues led problems in payments in previous months. Although factory's audit department identified and addressed most of these problems for the general workforce, the following incidents were not identified and need to be addressed: 1. In August 2016, the boiler operator, technicians, and cleaning staff worked a rest day but the system did not recognize the work as overtime and therefore compensate workers accordingly. 2. In November 2016, one worker was paid around PKR 1,000 (USD 9.50) below the legal minimum wage. 3. The salary grade of the seven workers in the spot removing section was incorrectly classified and as a result they were on a lower wage grade.
3. Although there is a signed payroll available as a proof of all compensation, workers are nevertheless confused about compensation, as some of them were not able to confirm all their cash payments.
4. The factory has not posted the wage rates or piece rates anywhere on the production floor, as legally required.

#### Local Law or Code Requirement

The Industrial and Commercial Employment (Standing Orders) Ordinance, 1968; The Minimum Wages Ordinance, 1961; FLA Workplace Code (Employment Relationship Benchmark ER.18; Compensation Benchmarks C.1, C.2, C.7, and C.17)

### Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. There is not a good local service provider who can provide a time keeping software with all the features requested by management.
5. Since authorized managerial staff do the manual interventions for correcting some issues (e.g., workers forgetting to punch in or out) which are also checked by workers, management did not think that this would be an issue.

### Recommendations for Immediate Action

1. Provide piece rate workers their gratuity payment upon termination or resignation.
2. Compensate workers all arrears accordingly, including the supportive staff, workers in the spot removing section, and the worker who was not paid the minimum wage in November 2016.
3. Eliminate all cash payments and make all payments (wages, overtime, bonuses) through bank transfers starting January 2017 with workers' 2016 annual bonus. This was agreed to by factory management during the assessment process and closing meeting.

### FLA's Recommendations for Sustainable Improvements

1. Post the wage rates and piece rates in the native language on each production floor.
2. Review existing time keeping system and software. Find a competent software company and ensure that the software immediately reports issues to the HR department.
3. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.

4. Review and revise the existing internal audit tool to ensure that issues related to labor are covered. 5. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Company is providing piece rate workers their gratuity payment upon termination or resignation.
2. Company Compensated workers all arrears accordingly, including the supportive staff, workers in the spot removing section, and the worker who was not paid the minimum wage in November 2016.
3. Company has eliminated all cash payments and make all payments through bank transfers but only workers those are in process of account opening or in process of completing their personal file get in cash.

#### Planned completion date

04/04/18

### Action Plan no 2.

#### Description

1. Company is Posting the wage rates and piece rates in the native language on each production floor.
2. Company has reviewed existing time keeping system and software and ensured that the software immediately reports issues to the HR department.
3. Company conducted a training-needs assessment for EHS committee members, management, and the general workforce and revised the existing training plan in light of the assessment results and deliver these trainings.
4. Company reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.

#### Planned completion date

04/04/18

## VERIFICATION RESULT

#### Finding Status

Remediated

#### Remediation Details

1. Remediated: Management has changed the gratuity policy and now piece rate workers receive gratuity payments.
2. Remediated: Workers in the boiler section, cleaning staff, and technicians were all paid overtime for the overtime work they did.
3. Remediated: Workers are paid the minimum wage as per the current notification. The one worker specifically highlighted received the arrears and continues to earn the minimum wage of at least i.e. PKR 17,500.
4. Remediated: Grade levels are clear and based on the most recent Government notification.

## PREVIOUS FINDING NO.3

## IMMEDIATE ACTION REQUIRED

**FINDING TYPE:** Hours of Work

#### Finding Explanation

1. Some workers work during the break and/or before and after regular working hours.
2. The factory's HR and internal audit department make manual corrections on the time keeping system.

#### Local Law or Code Requirement

The Factories Act, 1934; FLA Workplace Code (Employment Relationship Benchmark ER.23; Hours of Work Benchmark HOW.1)

#### Root Causes

1. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
2. The factory does not have an effective internal audit system in place.
3. There is not a good local service provider who can provide a time keeping software with all the features requested by management.
4. Since authorized managerial staff do the manual interventions to correct some issues (e.g., workers forgetting to punch in or out) which are also checked by workers on their pay stubs, management did not think that this would be an issue. 5. Since most workers work on the piece rate system, the number of pieces they produce directly affects their salary.

#### Recommendations for Immediate Action

1. Ensure that workers are not working during their break or outside of regular working hours. Cut off the power of the production lines and illumination system during off-hours.
2. Ensure that all manual corrections of the time keeping system are recorded in a separate logbook that includes all relevant details (date, worker ID, reason for intervention, signatures of the relevant worker and management representative).

#### FLA's Recommendations for Sustainable Improvements

1. Review existing time keeping system and software. Find a competent software company and ensure that the software immediately reports issues to the HR department.
2. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.
3. Review and revise the existing internal audit tool to ensure that issues related to labor are covered.

4. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Company has ensured that workers are not working during their break and for this company cut off the power of the production lines and illumination system during off-hours.
2. Company has ensured that all manual corrections of the time keeping system are recorded in a separate logbook that includes all relevant details (date, worker ID, reason for intervention, signatures of the relevant worker and management representative).

#### Planned completion date

04/04/18

#### Company Action Plan Update

Company is strictly implementing on this policy.

### Action Plan no 2.

#### Description

1. We have reviewed existing time keeping system and software that the software immediately reports issues to the HR department.
2. We have conducted a training-needs assessment for EHS committee members, management, and the general workforce & revised the existing training plan in light of the assessment result.
3. Company reviewed and revised the existing internal audit tool to ensure that issues related to labor are covered.

#### Planned completion date

04/04/18

## VERIFICATION RESULT

#### Finding Status

Partially Remediated

#### Remediation Details

1. Partially Remediated: Workers were observed working during their break, but most of the workers were resting. According to management and worker interviews, some workers want to work during the breaks to finish their work since they work with piece rate, but it is not mandated or asked by management.
2. Remediated: No manual corrections were noted in the timekeeping system.

#### Local Law or Code Requirement

The Factories Act, 1934 (Section 37); FLA Workplace Code (Hours of Work Benchmark HOW.1)

## PREVIOUS FINDING NO.4

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Environmental Protection

#### Finding Explanation

1. The factory does not have a written procedure for reporting environmental emergencies, including protections for workers who allege environmental violations.



2. Oil-contaminated water from the air compressor, the air tank, and dryers discharges directly onto the ground outside.
3. Although the factory's wastewater is treated by the Industrial Zone's wastewater treatment plant, it was not verified that this wastewater treatment plant has chemical treatment capability for treating the wastewater that comes from the factory's printing section. The existing documents, provided by the Industrial Zone authority to the factory, only refer to biological wastewater treatment.
4. Although the factory has a waste management procedure, it does not cover all types of waste generated within the factory.
5. The solid waste – fabric, carton, and nylon – in the solid waste storage area is not properly separated, nor is the area well organized.
6. The lights at around 80% of workstations are left on when not in use.
7. Compressed air leaks in different sections of the production areas.
8. There is solid waste scattered outside around the factory building.
9. There are broken tube lights in the hazardous waste area, which poses a risk of mercury contamination.

#### Local Law or Code Requirement

The Punjab Environmental Protection Act, 1997; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.4, and HSE.9)

#### Root Causes

1. The internal audits do not focus on Environmental Protection. As a result, there are no Environmental Protection violations in internal audit reports.
2. The factory does not conduct an environmental risk assessment.
3. The factory does not provide any specific training on Environmental Protection to workers or management, nor has it conducted a training-needs assessment.
4. The EHS committee is not involved with issues relating to Environmental Protection; their scope of work is limited to Health & Safety.
5. The factory does not provide specific training to EHS committee members.
6. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.
7. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.

### Recommendations for Immediate Action

1. Discontinue directly discharging oil contaminated water onto the ground outside.
2. Ensure that Industrial Zone's wastewater treatment plant has chemical treatment capability.
3. Prepare a waste management plan and ensure that the solid waste area is well organized.
4. Take extra precautions to ensure tube lights in the hazardous waste areas do not break.

### FLA's Recommendations for Sustainable Improvements

1. Provide an ultrasonic leak detector to the maintenance team to identify and maintain compressed air leaks in factory.
2. Prepare a written procedure for reporting environmental emergencies, including protections for workers who allege environmental violations.
3. Collect all solid waste around the factory area and store in the solid waste area. Ensure that solid waste is not left around the factory building.
4. Train workers on turning off the lights at the workstations when not in use. Monitor for compliance during internal audits.
5. Review and revise the existing internal audit tool to incorporate issues related to Environmental Protection.
6. Conduct an environmental risk assessment to identify environmental risks in the factory and address such risks.
7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## COMPANY ACTION PLANS

Action Plan no 1.

#### Description

1. Company will provide an ultrasonic leak detector to the maintenance team to identify and maintain compressed air leaks in factory.
2. Company will prepare a written procedure for reporting environmental emergencies, including protections for workers who allege environmental violations.
3. Company will collect all solid waste around the factory area and store in the solid waste area and ensure that solid waste is not left around the factory building.
4. Company will train workers on turning off the lights at the workstations when not in use. Monitor for compliance during internal audits.
5. Company will review and revise the existing internal audit tool to incorporate issues related to Environmental Protection.
6. Company will conduct an environmental risk assessment to identify environmental risks in the factory and address such risks.

Planned Completion Date

05/31/17

#### Planned completion date

04/04/18

#### Action Plan no 2.

#### Description

1. We have disconnected directly discharging oil contaminated water on to the ground outside by keeping there the secondary containment.
2. We have visited the area and found 26 acre Industrial Zone's waste water treatment plant has chemical treatment capability.
3. We have established waste management plan and ensured that the solid waste area is well organized.
4. We have taken extra precautions to ensure tube lights in the hazardous waste areas do not break.

#### Planned completion date

04/04/18

#### Company Action Plan Update

All committed plans are implemented

## VERIFICATION RESULT

#### Finding Status

Partially Remediated

#### Remediation Details

1. Not Remediated: The factory still does not have a written procedure to report environmental emergencies, including protections for workers who allege environmental violations.
2. Remediated: According to test reports of air compressors, there is no spillage of water noted. During the factory tour, it was observed that oil-contaminated water comes from the dryers is going to drainage.
3. Remediated: The factory has an approved certificate for the waste water from the printing process.
4. Partially remediated: The factory has waste management procedures for hazardous and non-hazardous waste, however it should be updated to be more specific to factory implementation.
5. Remediated: All waste from the factory is discharged daily by a certified company of government organization. During the factory tour, there was no waste visible; areas were assigned to keep them separate during the day.
6. Remediated: The lights are being turned off.
7. Remediated: Compressed air is not in use in the factory.
8. Remediated: No solid waste was found scattered around the factory.
9. Remediated: The factory does not have any broken tube lights in hazardous waste areas. Tubes are kept in a separate area.

#### Local Law or Code Requirement

## PREVIOUS FINDING NO.5

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Health & Safety

##### Finding Explanation

1. The factory does not commission a third-party expert to conduct a fire risk assessment. 2. There is no list of the fire alarm zones is not posted near the fire alarm panel. 3. There is no Liquefied Petroleum Gas (LPG) detector provided in kitchen. 4. There are no fire detectors in the boiler room, compressor room, or fire pump room. 5. The fire pumps' main discharge valves are not locked in the open position. 6. The width of the second fire exit and of the fire escape stairs in the canteen is too narrow –around 50cm – for safe evacuation. 7. There is no corrosion protection for the battery terminals of either the diesel fire pump or the power generator. 8. Two of the seven emergency evacuation maps (on the ground floor and the second floor) do not reflect the actual layout of the factory building; the “you are here” labels and location of fire alarm buttons are incorrect. 9. There is not enough emergency illumination in the fire pump room to provide good visibility for manual interventions in the event of an emergency; there is only one UPS-powered emergency light (uninterrupted power supply). 10. One of the fire hydrants outside of the factory, behind the production building, leaks and requires maintenance. 11. There is no shelter for the outside fire extinguisher station, which houses 11 fire extinguishers, making them vulnerable to corrosion and malfunction. 12. The first step of the emergency stairs that serves the printing and canteen sections is higher than others, posing a falling risk. 13. The fire drill log does not include key information like attendance, time to take attendance, or number of participants.

##### Local Law or Code Requirement

The Fire Safety Provisions, 2016 of the Building Code of Pakistan; Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety and Environment Benchmark HSE.1, HSE.5, and HSE.6)

##### Root Causes

1. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections. 2. The factory does not have an effective internal audit system. 3. The factory management does not know much about international Environmental, Health & Safety (EHS) standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks. 4. It is not always possible to find a competent service provider for EHS training due to country-specific limitations (e.g., limited training and certification opportunities). 5. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks. 6. There have been a number of changes in the layout of production areas recently due to changes in the production flow, affecting the emergency evacuation plans. 7. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, Personal Protective Equipment (PPE) selection, policy and procedure development and review. 8. The factory does not provide specific training to EHS committee members. 9. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

##### Recommendations for Immediate Action

1. Post a list of the fire alarm zones in a prominent place near the fire alarm panel. 2. Install an LPG detector in the kitchen. 3. Install fire detectors in each of the boiler, compressor, and fire pump rooms. 4. Lock the main discharge valves of the fire pumps in the open position. 5. Broaden the width of the secondary emergency exit and fire escape stairs in the canteen to at least 110 cm. 6. Provide corrosion protection for the battery terminals of the diesel fire pump and generator. 7. Check all emergency evacuation plans to ensure they reflect the actual layout of the factory building. 8. Improve the emergency illumination in the fire pump room to provide better visibility for manual interventions.

##### FLA's Recommendations for Sustainable Improvements

1. Maintain leaking fire hydrant at the outside of the factory. Review existing periodical control and maintenance system for fire hydrants to prevent recurrence of such issues. 2. Provide protection for the outside fire extinguisher station to prevent outside weather conditions. 3. Adjust the first step of the emergency stairs for the printing and canteen sections to be the same height as other steps on the staircase. 4. Revise existing fire drill log format to ensure it includes the following information: a) date and time of the fire drill; b) alarm type; c) evacuation time; d) attendance-taking time; e) number of participants; f) problems observed during evacuation; g) problems observed on emergency lighting and alarm systems; and, h) signature of the EHS committee members. 5. Provide a thermal camera to the maintenance and EHS team and allow them to conduct weekly checks on the following: a) electrical panels (especially panels in the compressor rooms, main electrical panels in each section, power generator room and panels with high load); b) the electrical wiring; c)

the electrical motors and pumps; and, d) the boilers and steam lines. 6. Review existing maintenance program within the factory and implement more predictive and preventive actions, rather than conventional maintenance activities, such as: a) provide specific training to maintenance staff on predictive and preventive maintenance; b) use thermal imaging and ultrasonic measurements to identify potential issues before they occur; and, c) follow the average life span of machines, infrastructure, and equipment and conduct inspections, lubrications, repairs or rebuilds based on known average life span. 7. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings. 8. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures. 9. Review and revise existing internal audit tool to ensure all potential areas of risk are covered. 10. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors. 11. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Company will review existing periodical control and maintenance system for fire hydrants to prevent recurrence of such issues.
2. Company will provide protection for the outside fire extinguisher station to prevent outside weather conditions
3. Company will adjust the first step of the emergency stairs for the printing and canteen sections to be the same height as other steps on the staircase.
4. Company will revise existing fire drill log format to ensure it includes the following information: a) date and time of the fire drill; b) alarm type; c) evacuation time; d) attendance-taking time; e) number of participants; f) problems observed during evacuation; g) problems observed on emergency lighting and alarm systems; and, h) signature of the EHS committee members.
5. Company will provide a thermal camera to the maintenance and EHS team and allow them to conduct weekly checks on the following: a) electrical panels (especially panels in the compressor rooms, main electrical panels in each section, power generator room and panels with high load); b) the electrical wiring; c) the electrical motors and pumps; and, d) the boilers and steam lines.
6. Company will review existing maintenance program within the factory and implement more predictive and preventive actions, rather than conventional maintenance activities, such as: a) provide specific training to maintenance staff on predictive and preventive maintenance; b) use thermal imaging and ultrasonic measurements to identify potential issues before they occur; and, c) follow the average life span of machines, infrastructure, and equipment and conduct inspections, lubrication, repairs or rebuilds based on known average life span.
7. Company will conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results.
8. Company will ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
9. Company will review and revise existing internal audit tool to ensure all potential areas of risk are covered.
10. Company will review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

Planned Completion Date

04/20/17

Planned completion date

04/04/18

### Action Plan no 2.

#### Description

1. We have posted a list of the fire alarm zones in a prominent place near the fire alarm panel.
2. We have removed the LPG cylinder from the kitchen and only cooked food is

served.

3. We have Installed fire detectors in, compressor, and fire pump rooms.
4. We have Locked the main discharge valves of the fire pumps in the open position.
5. We increased the width of the secondary emergency exit and fire escape stairs in the canteen area which now embroidery area, b/c canteen shifted to other area.
6. We have provided corrosion protection for the battery terminals of the diesel fire pump and generator.
7. We have checked & established all emergency evacuation plans to ensure they reflect the actual layout of the factory building.
8. We have Improved the emergency illumination in the fire pump room to provide better visibility for manual interventions.

Planned completion date

04/04/18

## VERIFICATION RESULT

Finding Status

Remediated

Remediation Details

1. Remediated: The factory has the civil defense report and labor department approval on fire safety for the factory premises.
2. Remediated: The fire alarm panel is renewed and fire alarm zones are listed on the panel.
3. Remediated: The factory started to use natural gas and does not use LPG anymore, so there is no detector installed.
4. Remediated: The factory provided a smoke detector, boiler, compressor, and fire pump sections.
5. Remediated: Valves found in locked position and checked regularly.
6. Remediated: The factory moved the canteen to the new building and the width of the fire escape stairs and fire exits are now compliant.
7. Remediated: The factory protects from corrosion by covering the battery terminals.
8. Remediated: All evacuation maps are updated.
9. Remediated: The factory now has four emergency lights in the fire pump room.
10. Remediated: Fire hydrants were found functional without leakage.
11. Remediated: The factory provided shelter for the fire extinguisher station.
12. Remediated: The factory moved the canteen to a new building and the stairs in printing section were fixed.
13. Remediated: The fire drill log contains all information: time taken to confirm attendance, number of participants, and attendance.

## PREVIOUS FINDING NO.6

## IMMEDIATE ACTION REQUIRED

**FINDING TYPE:** Health & Safety

Finding Explanation

1. There are high grounding readings – up to 21ohm – in some sections of the production building. There are no grounding connections for the sockets on the sewing line of the ground floor.
2. The Residual Current Devices (RCDs) in some electrical panels of the production area are not sufficient; the RCD breakers are 300mA instead of 30mA. Furthermore, some RCDs were not functioning.
3. The internal isolation of some electrical panels were not properly insulated and cover-body grounding connection of the panels are missing
4. Although the electricity in use is 220 volts, all electrical panels are labeled with “Warning 440 Volts” signs.

Local Law or Code Requirement

The Fire Safety Provisions, 2016 of the Building Code of Pakistan, Chapter 7; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 and HSE.13)

### Root Causes

1. The factory does not have handheld multifunction electrical testing equipment for both the maintenance and the EHS team to use.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
5. It is not always possible to find a competent service provider for EHS training due to country-specific limitations.
6. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
7. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, Personal Protective Equipment (PPE) selection, policy and procedure development and review.
8. The factory does not provide specific training to EHS committee members.
9. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

### Recommendations for Immediate Action

1. Inspect and improve the grounding connections at the sockets in the production areas.
2. Improve the grounding quality where there are high grounding readings in the production areas.

3. Replace the 300mA RCDs in the electrical panels in the production area with 30mA RCDs. Only use 300mA RCDs for the main distribution panels for fire safety purposes.

4. Maintain and improve the internal isolation of the electrical panels and ensure that cover-body grounding connections of the panels are provided.

#### FLA's Recommendations for Sustainable Improvements

1. Replace the 440 Volts warning signs with 220 Volts signs. 2. Buy a multifunction electrical test equipment to conduct loop, RCD, voltage drop, and insulation resistance tests within the factory. 3. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings. 4. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures. 5. Review and revise existing internal audit tool to ensure all potential areas of risk are covered. 6. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors. 7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Company will replace the 440 Volts warning signs with 220 Volts signs.
2. Company will buy a multi function electrical test equipment to conduct loop, RCD, voltage drop, and insulation resistance tests within the factory.
3. Company will conduct a training-needs assessment for EHS committee members, management, and the general workforce and will revise the existing training plan in light of the assessment results.
4. Company will ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
5. Company will review and revise existing internal audit tool to ensure all potential areas of risk are covered.
6. Company will review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

Planned Completion Date

04/20/17

Planned completion date

04/04/18

### Action Plan no 2.

#### Description

1. We have Inspected and improved the grounding connections at the sockets in the production areas.
2. We have Improved the grounding quality where there are high grounding readings in the production areas.
3. We have replaced the 300mA RCDs in the electrical panels in the production area with 30mA RCDs and using as per distribution panels.
4. We have maintained and improved the internal isolation of the electrical panels and ensured that cover-body grounding connections of the panels have been provided.

Planned completion date

04/04/18

Company Action Plan Update



## VERIFICATION RESULT

### Finding Status

Remediated

### Remediation Details

1. Remediated: The factory changed all distribution boxes and the power breeder system, the grounding connections are renewed and no issue was detected in the electrical safety checks and grounding report.
2. Remediated: The factory changed all Residual Current Devices (RCDs) in the electric panels and checks them regularly.
3. Remediated: The factory provided cover-body grounding connections and the panels are insulated.
4. Remediated: The factory provided updated labels to the electric panels with the correct capacity.

## PREVIOUS FINDING NO.7

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

### Finding Explanation

1. Three out of 13 MSDS forms of the chemicals in use were missing: Babri Impex Printing, Happilac Red Oxide, and Drew Minerals 8512.
2. The PPE selection is not in line with MSDS forms and therefore not in line with the risks associated with the chemicals in use. For example, there are no masks and/or respirators made available to workers in the stain removing section.
3. The PPE does not have international quality certification marks.
4. In the production area, some chemical containers are incorrectly labeled (e.g., the detergent-water mixture is labeled as "water") or unlabeled due to fading.
5. The stain removing section is not isolated from the production area.
6. There is not a system in place for replacing hazardous chemicals (e.g., Toluene and Methylene chloride) with non-hazardous or less hazardous alternatives.
7. The filter cartridges of some respirators in the stain removing section are placed in the reverse position.
8. The factory uses empty chemical containers as waste bins.

### Local Law or Code Requirement

Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1, HSE.7, HSE.8, HSE.9, and HSE.10)

### Root Causes

1. The factory management has difficulties getting the MSDS/SDS forms of some chemicals from their suppliers. This is also the case for international safety markings of the PPE, as there is no such local requirement.
2. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
3. The factory does not have an effective internal audit system.
4. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
5. Country specific limitations, it's not always possible to find a competent service provider for EHS trainings.
6. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.

7. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, PPE selection, policy and procedure development and review.

8. The factory does not provide specific training to EHS committee members.

9. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

#### Recommendations for Immediate Action

1. Make all MSDSs for all chemicals in use, available in the local language in areas where the chemicals are stored and used.

2. Ensure the MSDSs are in line with international standards and include all 16 sections, which are as follows: i) Identification of substance/mixture and of the company/undertaking, ii) Hazards Identification, iii) Composition/information on ingredients, iv) First aid measures, v) Firefighting measures, vi) Accidental release measures, vii) Handling and storage, viii) Exposure control/Personal protection, ix) Physical and chemical properties, x) Stability and reactivity, xi) Toxicological information, xii) Ecological information, xiii) Disposal considerations, xiv) Transport information, xv) Regulatory information, and xvi) Other information.

3. Provide PPE in the chemical use areas that is in line with the MSDSs and therefore provides adequate protection from the risks associated with chemicals.

4. Ensure that all PPE in use have the international quality certification marks.

5. Properly label all chemical containers.

6. Organize a separate room for stain removing operations, ensure that this room is totally isolated from rest of the production areas and provided with sufficient ventilation/vacuum systems.

7. Ensure that workers are using the respirators properly and conduct fit tests each time they wear the respirators.

#### FLA's Recommendations for Sustainable Improvements

1. Implement a system to replace hazardous chemicals with less hazardous alternatives.

2. Discontinue using empty chemical containers as waste bins. Inform and train relevant staff about this issue.

3. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.

4. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.

5. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.

6. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

7. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## **COMPANY ACTION PLANS**

## Action Plan no 1.

### Description

1. We have provided all MSDSs for all chemicals in use, available in the local language in areas where the chemicals are stored and used.
2. We have ensured the MSDSs are in line with international standards and include all 16 sections.
3. We have provided PPE in the chemical use areas that is in line with the MSDSs and therefore provides adequate protection from the risks associated with chemicals.
4. We have ensured that all PPE in use have the international quality certification marks.
5. We have ensured properly labeled all chemical containers.
6. We have organized a separate room for stain removing operations, and to ensure that this room is totally isolated from rest of the production areas and provided with sufficient ventilation/vacuum systems.
7. We have ensured that workers are using the respirators properly and conduct fit tests each time they wear the respirators.

### Planned completion date

04/04/18

### Company Action Plan Update

Stain removing room is still pending.

## VERIFICATION RESULT

### Finding Status

Partially Remediated

### Remediation Details

1. Remediated: The factory does not use Babri Impex Printing, Happilac Red Oxide, or Drew Minerals 8512 anymore. According to the document check and factory tour, all chemicals have MSDS in place.
2. Not Remediated: The factory provided masks and respirators for the stain removing section workers. However, selection of PPE is not systematic or consistent. For instance, workers were using different kind of masks with different filter system while using the same chemicals in stain removing section. Moreover, the binders in the printing section did not use PPEs, although they use a chemical that requires the use of a face mask.
3. Not Remediated: PPEs still do not have any certification labels.
4. Remediated: The factory has labeled all chemicals with correct and proper labels in the production site.
5. Remediated: The stain removal section is isolated in a separate cabinet on the production floor with ducting for ventilation.
6. Remediated: The factory replaced the chemicals with less hazardous ones.
7. Remediated: Filter cartridges are in the correct position in the stain removal section.
8. Not Remediated: Chemical containers are still used as waste bins and are covered with waste bin labels.

### Local Law or Code Requirement

Punjab Occupational Safety and Health Law 2016 (Chapter II); Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.1 and HSE.7)

### Recommendations for Immediate Action

1. Ensure PPE is selected in accordance with MSDS of the chemicals and include international certification marks.
2. Provide PPEs to all workers use chemicals requiring to wear PPE including workers using Binder in printing section.

## PREVIOUS FINDING NO.8

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety

### Finding Explanation

1. The filtering system for the drinking water is not fully operational due to lack of maintenance nor is there an active UV filter available.
2. The factory does not have a system in place to regularly clean and sanitize the drinking water tank.

3. The flush on one of the five inspected toilets did not function due to lack of maintenance
4. The water pressure at the eyewash stations in the printing section is low. Furthermore, there are no caps on the eyewash sprinkler heads to protect against the risk of contamination.
5. The metal drinking water cups are for common use, which poses a risk of spreading contagious diseases.
6. There is no procedure to store food samples for at least 72 hours to protect against potential food poisoning.

#### Local Law or Code Requirement

Punjab Factories Rules, 1978; FLA Workplace Code (Health, Safety & Environment Benchmarks HSE.6, HSE.19, HSE.22, and HSE.23)

#### Root Causes

1. Although the factory has an annual training plan, it has not conducted a training-needs assessment to identify the training needs of the management and workers working in different sections.
2. The factory does not have an effective internal audit system.
3. The factory management does not know much about international EHS standards or the FLA requirements, as they have not received specific training on the FLA Code and Benchmarks.
4. It is not always possible to find a competent service provider for EHS training due to country-specific limitations.
5. The internal risk assessment is very basic and does not include all risks within the factory or how to eliminate and/or manage those risks.
6. The EHS committee is not involved in ongoing EHS efforts. There is no EHS committee involvement on key EHS issues like risk assessment – including fire and Health & Safety, internal audits, PPE selection, policy and procedure development and review.
7. The factory does not provide specific training to EHS committee members.
8. The factory has received six different external audits from different clients – none were FLA affiliated brands – within the last 12 months; however, none of the previous audits identified the aforementioned issues.

#### Recommendations for Immediate Action

1. Complete the full maintenance of drinking water filtering system and add UV filter at the end of the filtering system. Regularly sanitize

the drinking water tank.

2. Ensure that all toilet flushes are operational

3. Maintain eye wash stations to ensure pressure of the water is high enough. Provide caps for the sprinkler heads.

#### FLA's Recommendations for Sustainable Improvements

1. Discontinue the common use of metal drinking water cups. Wash cups between use and provide "clean" and "used" metal cup shelves near the drinking water dispensers.

2. Implement a system to perform quarterly maintenance of the drinking water filtering system.

3. Implement a system to keep food samples in the event of food poisoning. Including the following: a) save at least 150g of each food item served; b) store samples in refrigerator between 0 and 4 degrees Celsius; and c) keep samples for 72 hours

4. Conduct a training-needs assessment for EHS committee members, management, and the general workforce. Revise the existing training plan in light of the assessment results and deliver these trainings.

5. Ensure the EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.

6. Review and revise existing internal audit tool to ensure all potential areas of risk are covered.

7. Review and revise existing risk assessment report to ensure that it covers all risk factors and how to eliminate or mitigate those risk factors.

8. Consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

## COMPANY ACTION PLANS

## Action Plan no 1.

### Description

1. Company has ensured full maintenance of drinking water filtering system and added UV filter at the end of the filtering system and regularly sanitized the drinking water tank.
2. Company has ensure that all toilet flushes are operational
3. Company has maintained eye wash stations to ensure pressure of the water is high enough and provided caps for the sprinkler heads.
4. Company discontinued use of metal drinking water cups and started disposable cups
5. We have implemented a system to perform quarterly maintenance of the drinking water filtering system.
6. We have provided refrigerator to store the food according to requirement.
7. We have conducted training-needs assessment for EHS committee members, management, and the general workforce and revised the existing training plan in light of the assessment results.
8. Company has ensured that EHS committee plays an active role in ongoing EHS efforts, such as participation in risk assessments and internal audits, PPE selection, policy and procedure development, and review of existing EHS policy and procedures.
9. Company has reviewed and revised existing internal audit tool to ensure all potential areas of risk are covered.
- 10 Company has reviewed and revise existing risk assessment report to ensure that it covers all risk factors and eliminated or mitigated those risk factors.
11. Company will consult with FLA for potential training opportunities, including classroom training in the region or through webinars.

### Planned completion date

04/04/18

### Company Action Plan Update

All safety measures have been taken.

## VERIFICATION RESULT

### Finding Status

Partially Remediated

### Remediation Details

1. Remediated: The factory provided the UV filter and regularly checks and maintains the filtering system.
2. Remediated: The drinking water tank is regularly sanitized and records are in place.
3. Remediated: The factory fixed the flushes; toilets properly flush.
4. Remediated: The factory fixed the eyewash station and water pressure was sufficient. Caps were installed on the sprinkler.
5. Remediated: The factory has replaced the metal cups with disposable ones.
6. Not Remediated: The factory still does not keep food samples for 72 hours to ward against potential food poisoning, and there is no procedure in place.

### Local Law or Code Requirement

West Pakistan Factories Canteen Rules, 1959; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.22)

## New Findings and Action Plans

### NEW FINDING NO.1

## IMMEDIATE ACTION REQUIRED

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

### Finding Explanation

1. According to worker interviews, half of the workers do not receive a copy of their employment contract. [ER.1]

2. The factory has 15 disabled workers which is below the legal requirement. The factory needs to hire 39 more workers to meet the legal requirement. [ER.14]

#### Local Law or Code Requirement

Disabled Persons (Employment and Rehabilitation) Ordinance 1981; FLA Workplace Code (Employment Relationship Benchmarks ER.1 and ER.14)

#### Recommendations for Immediate Action

1. Ensure that all workers are provided a copy employment contracts.
2. Hire 39 more disabled workers to reach the legal requirement.

### COMPANY ACTION PLANS

#### Action Plan no 1.

##### Description

1. Now company has ensured the employment contract receiving at the time  
  
of employment and their receiving evidence is being maintained.

##### Company Action Plan Update

2. Company has established the policy for disable persons and trying level  
  
best to recruit the disables as per required skill . As per law company pay  
  
the amount to government in case the disable required skill not found.

### NEW FINDING NO.2

### IMMEDIATE ACTION REQUIRED

#### FINDING TYPE: Industrial Relations

##### Finding Explanation

1. The factory has elected worker representatives, however, most of the workers do not know who the representatives are or their responsibilities. [ER.25.2]

##### Local Law or Code Requirement

Industrial Relations Act, 2012 (Section 25, 26, 27); FLA Workplace Code (Employment Relationship Benchmarks ER.25.2)

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Company has communicated the results and nomination of JWC elected members through display on notice board & evidence of awareness session for their roles and responsibilities also attached. Further more awareness sessions are being conducted for all new inducted workers as per prescribed schedule.

#### Company Action Plan Update

Attachment of awareness session for communication of their roles and responsibilities.

## NEW FINDING NO.3

## SUSTAINABLE IMPROVEMENT REQUIRED

### FINDING TYPE: Policies & Procedures (Macro)

#### Finding Explanation

1. The factory does not have any policies or procedures on retrenchment. However, in the factory's internal monitoring process document, retrenchment procedures were checked and signed as in place and sufficient. [ER.32]
2. The factory policies and procedures are generic and need to be reviewed to align with actual implementation. [ER.1]

#### Local Law or Code Requirement

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

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Retrenchment Policy and procedure has been established. Evidence has been attached.

### Action Plan no 2.

#### Description

2. Company has reviewed the policy procedures and alignment with implementation is being ensured by internal monitoring system.

## NEW FINDING NO.4

## IMMEDIATE ACTION REQUIRED

### FINDING TYPE: Health & Safety



### Finding Explanation

1. One emergency exit in Building 1 was obstructed with plastic bags. [HSE.5]
2. The smoke detector was missing from the packing area of the third floor of Building 2. [HSE.1]
3. Workers were not using PPE while working with chemicals in the stain removal section. [HSE.8]
4. The factory did not provide secondary containment for chemicals in the chemical storage area. [HSE.9]
5. The MSDS binder is not in the local language. [HSE.10]
6. According to worker interviews, the firefighting and emergency teams do not have sufficient information or training on their responsibilities in case of emergency. [HSE.6.2]
7. The childcare facility is not properly equipped. It is a small room without a smoke detector or fire extinguisher and the door opens inside. No equipment is provided for the children, including toilets or beds, and there is no certified personnel assigned to take care of the children. The responsible childcare personnel is actually security personnel. [HSE.27]
8. The medical room is in Building 2. This area is not a separate room ensuring privacy, and there is only a doctor table, a portable bed, and a cupboard for medicine. [HSE.18]
9. There are balconies without handrails in the stain removing sections in each floor in Building 2. [HSE.14]
10. The ladder in the warehouse in Building 2 does not have handrails. [HSE.14]
11. The workplace accident records log was empty; the factory does not have an efficient system to track workplace accidents. [HSE.3]

### Local Law or Code Requirement

Factories Act, 1934 (Sections 25, 33G, 33D, 33N); Punjab Occupational Health and Safety Law 2016 (Chapter II); Hazardous Substances Rules 2003; Punjab Environmental Protection Act, 2012; FLA Workplace Code (Health, Safety & Environment Benchmark HSE.1, HSE.3, HSE.5, HSE.6.2, HSE.8, HSE.10, HSE.14, HSE.18, HSE.27)

### Recommendations for Immediate Action

1. Remove all obstructions from the emergency exit and train workers on emergency safety.
2. Provide fire detector in the packing area.
3. Train the workers on PPE usage and make check regularly.
4. Provide secondary containment for chemicals in the chemical storage area.
5. Ensure all chemicals have MSDS in the local language and post forms in related areas.
6. Provide a childcare area in accordance with local laws and FLA benchmarks, including proper firefighting and detection equipment, proper childcare equipment, and hire a certified childcare provider. Communicate to all workers about the availability of the childcare facility in the factory.
7. Ensure that medical room is a separate area ensuring patient privacy and all legally-required equipment.
8. Provide handrails to balconies in the new building.
9. Provide ladders with handrails in the warehouses.

## COMPANY ACTION PLANS

### Action Plan no 1.

#### Description

1. Company has removed the obstructions from all emergency exits of the building# 1 and also ensured the effectiveness by increasing the monitoring

frequency.

## Action Plan no 2.

### Description

2. Smoke detector has been installed to the packing area of 3rd floor in

Building# 2.

## Action Plan no 3.

### Description

Company has ensured the usage of PPE' in stain removing area and also ensured the effectiveness by providing the awareness to the related workers & increased the monitoring frequency.

### Company Action Plan Update

Awareness to Stain removing workers.

## Action Plan no 4.

### Description

Company has provided secondary containment for the chemical storage area. Effectiveness is being ensured by increasing the monitoring frequency at floor level.

### Company Action Plan Update

Awareness session for secondary containment.

## Action Plan no 5.

### Description

MSDS for binder has been translated in native language and also displayed at the area of usage.

## Action Plan no 6.

### Description

6 Internal & External Training has been given to workers on Fire Fighter & Emergency team roles and responsibilities.

### Company Action Plan Update

External Training.

## Action Plan no 7.

Description

7..In child care room all requirements have been fulfilled like;

1. opening of door out side
2. Bed facility
3. Toilet & Fire Extinguisher
4. Toys in child care room
5. Change the room

As there is no trend in Pakistan to keep the child at working facility but company has established the child care facility as per law requirement.

In case any female come with her baby in the facility then company has full time lady child care female attendant who is also perform as a lady searcher.

Action Plan no 8.

Description

8 .Medical room provided in the building #2 which has the privacy with  
  
separate room.

Action Plan no 9.

Description

9. Balconies handrail have been install in Building# 2 at stain removing side.

Action Plan no 10.

Description

10 Handrail has been installed stairs toward Ware house.

Action Plan no 11.

Description

11. Workplace accident record log is being ensured and ensured the tracking  
  
of this accident record.