



Factory Assessment Report

Sustainable Compliance Initiative (SCI)

Companies that join the Fair Labor Association (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.

FLA member(s)	Reformation - 3508
Country	India
Assessment Date	6/29/2026
Assessment Company	InSync Global - 200003

Workforce Summary

Number of Workers	686
Percentage female	51 %
Primary Languages	

Wage Data information

Monthly minimum wage in country at time of assessment	INR 15,000
GLWC living wage benchmark for the country or relevant region at time of assessment	NA

Assessment Summary

Violations per FLA Code Element	Violated Benchmarks
Nondiscrimination (ND)	0
Health, Safety And Environment (HSE)	29
Employment Relationship (ER)	16
Hours Of Work (HOW)	2
Harassment Or Abuse (HA)	2
Freedom Of Association And Collective Bargaining (FOA)	1
Forced Labor (F)	0
Child Labor (CL)	0
Compensation (C)	3

Violations per Category	Violated Benchmarks
Immediate Action Required	28
Sustainable Improvement Required	25
Uncorroborated Risk of Non-Compliance	0
Notable Feature	0



Assessment Results

Compensation (C)	
Benchmark ID	C.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning the payment of compensation to workers.
Finding Details	a. Two hundred seven employees living in the dormitories are paid an allowance called "Other Allowance" of INR 2000 to 2500 (USD 23.50 to USD 29.41) per month, while nonresidents are paid INR 500 (USD 5.88). The factory does not have a policy for the amount paid. There are no defined criteria (seniority or nature of job) for the amounts paid. Management stated that a higher allowance is paid to the dormitory residents to retain them in the employment, as finding workers in the region is a challenge. b. Written consent is not obtained from workers for the deduction of the cost of meals and tea from the wages of workers, as these deductions are not legally mandated. c. Review of documents for ten sampled workers who left employment revealed that date of resignation was not recorded on resignation letters of three out of ten sampled workers; however, a date of leaving employment for the workers was recorded on the calculation sheet for terminal dues. In the absence of a date of resigning from employment on a resignation letter signed by workers, the date of leaving employment cannot be verified, and hence the calculation of dues cannot be verified. d. The factory considers the last day at work prior to the unauthorized absenteeism of worker from work as the last day of employment of the worker and calculates terminal dues accordingly. This practice of terminating employment does not comply with legal requirements, and the practice impacts length of employment based on which terminal dues of gratuity are calculated.
Recommendations for Immediate Action	a. The factory must have a defined policy and criteria for providing allowances. b. The factory must obtain written consent from workers prior to making any deductions from wages that are not legally mandated. c. The factory must ensure the date of resignation from employment is recorded on resignation letters signed by workers. d. The date of leaving employment should be accurately recorded, and terminal dues should be calculated as legally required based on date of leaving employment.
Recommendations for Sustainable Improvement	



**Compliance
Classifications**

Immediate Action Required

Local Law

Payment of Wages Act, 1936 – Section 7 (or Code on Wages, 2019 – Section 18), Payment of Gratuity Act, 1972, Section 4 – Payment of gratuity on resignation/termination.

Benchmark ID

C.15.1

Benchmark Details

Employers shall provide workers a pay statement in languages understood by workers each pay period and not less frequently than once a month,

Finding Details

Pay slips are provided to workers two to three days post disbursement of wages instead of providing pay slips prior to disbursement of wages as legally required.

**Recommendations
for Immediate Action**

- a. The factory must provide pay slips to workers prior to disbursement of wages.
- b. Pay slips should be provided in a language read and understood by workers.

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Immediate Action Required

Local Law

Minimum Wages Central Rules 1950- Rule 26 (2): A wage slip in Form XI shall be issued by every employer to every person employed by him at least a day prior to the disbursement of wages.

Benchmark ID

C.21.1

Benchmark Details

Employers shall provide all legally mandated benefits, including holidays, leave, bonuses, severance payments and 13th month payments to all eligible workers within legally defined time periods.

Finding Details

- a. Unused earned leave from a calendar year (January to December) for workers from four hundred fifty workers from the garment division is carried over to the following year as legally required; however, for two hundred fifty workers from the hard goods division, wages for unused leave from a calendar year are paid in the following year. The practice of paying wages for unused leave does not comply with legal requirements. The practice discourages workers from using their leave, and also with periodic revisions in wages, the practice impacts the amount of termination dues when they leave employment. Workers would receive higher amounts if paid when they leave employment when compared to the amount they are paid every year.
- b. Review of pay records for payment of terminal dues for 10 sampled workers revealed that wages for days worked prior to leaving employment and wages for unused leave days were not paid until assessment days to 1 worker who left employment in September 2024, and for nine out of ten workers, these payments as part of terminal dues were paid between three months to twenty eight months post leaving employment. Legally, these payments are required to be paid within two working days from leaving employment.

Recommendations for Immediate Action

- a. The factory should comply with legal requirements.
- b. Terminal dues should be paid within legally defined timelines.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

a. Factories Act 1948, Chapter VIII- Annual Leave with wages- Section 79 (5) - If a worker does not in any one calendar year take the whole of the leave allowed to him under sub-section (1) or sub-section (2), as the case may be, any leave not taken by him shall be added to the leave to be allowed to him in the succeeding calendar year: Provided that the total number of days of leave that may be carried forward to a succeeding year shall not exceed thirty in the case of an adult or forty in the case of a child.

b. Item 13(3) of Schedule 1 appended to Industrial Employment (Standing Orders) Rules 1946: Where the employment of any workmen is terminated, the wages earned by him and other dues, if any, shall be paid before the expiry of the second working day from the day on which his employment is terminated.

Factories Act 1948, Chapter VIII section 79. Annual leave with wage (3)- If a worker is discharged or dismissed from service or quits his employment or is superannuated or dies while in service, during the course of the calendar year, he or his heir or nominee, as the case may be, shall be entitled to wages in lieu of the quantum of leave to which he was entitled immediately before his discharge, dismissal, quitting of employment, superannuation or death calculated at the rates specified in sub-section (1), even if he had not worked for the entire period specified in sub-section (1) or sub-section (2) making him eligible to avail of such leave, and such payment shall be made-- i) where the worker is discharged or dismissed or quits employment, before the expiry of the second working day from the date of such discharge, dismissal or quitting.

Employment Relationship (ER)

Benchmark ID

ER.17.5

Benchmark Details

Employers shall have in place procedures to track the number, types, and timing and resolution of grievances, and to communicate the resolution of grievances to the workforce.

Finding Details

a. Grievance boxes are opened once every month by the human resources manager. There are no worker representatives present when boxes are opened. The timelines for opening the boxes may discourage workers from using the channel.

b. There is no documentation maintained for grievances reported directly (verbally or in written) to supervisors and management. In absence of documentation, it cannot be verified if all grievances reported are addressed.

Recommendations for Immediate Action



**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Sustainable improvement required

Benchmark ID

ER.18.1

Benchmark Details

Employers shall have written disciplinary rules, procedures and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).

Finding Details

The factory does not have written policy on workplace conduct and discipline. Written procedures do not provide information on steps that will be taken to discipline workers based on type of misconduct/indiscipline. The procedures do not include the need to assign responsibilities and for training employees on the policy and procedures.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Sustainable improvement required

Benchmark ID

ER.3.3

Benchmark Details

Workers should be provided with written documentation that substantiates all the issues covered in orientation briefings.

Finding Details

Workers do not receive written documentation that substantiates all the issues covered in orientation.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Sustainable improvement required

Benchmark ID

ER.4



Benchmark Details	Employers shall inform workers about workplace rules, environmental protection systems, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas.
Finding Details	The FLA affiliate's code of conduct is posted in English, Hindi (language spoken by domestic migrant workers), and Tamil (local language) near male toilets behind the human resources office on the ground floor and does not allow for effective communication because (a) the area is not frequented by all workers (b) Workers from other floors do not visit the ground floor except to the human resources office. (c) The code is posted on A4 size papers and cannot be easily read due to the small fonts.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.8
Benchmark Details	Employers shall have written policies and procedures with regard to promotion, demotion, and job reassignment that outline the criteria, demonstrate linkages to job grading, and prohibit discrimination or use of demotion or job reassignment as a form of penalty or punishment, are provided in writing and seek feedback from employees in writing, and follow all local legal requirements.
Finding Details	The factory does not have policies and procedures on promotion, demotion, and job reassignment. The factory does not promote workers.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.19.1
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Benchmark Details

Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws.

Finding Details

a. Clause one under "Declaration" recorded in the appointment letter signed with the outsourced security guard employed by the service provider states that "Uniform deposit of Rs 2000 shall be deducted from the salary in four equal installments for two sets of uniforms. It will not be returned once the uniform is used". On day two of the assessment, management shared appointment letters for three security guards, and from a review of the letters, it was noted that information on deductions and benefits was not provided at all.

b. Clause four in the appointment letter signed with the outsourced security guards states that "I agree that I will receive my full and final settlement from the company after ninety days of submission of my resignation letter & full and final settlement form". The ninety day timeline for payment of dues does not comply with the legal requirement to pay within two working days of leaving employment.

c. Legally required documentation (nomination forms for wages, gratuity, and legal benefits) is not maintained for outsourced security guards provided by the service provider.

d. The factory does not notify workers prior to terminating their employment for unauthorized absenteeism. Employment is terminated after three months from the date when workers last reported to work prior to going on unauthorized absenteeism.

**Recommendations
for Immediate Action**
**Recommendations
for Sustainable
Improvement**
**Compliance
Classifications**

Sustainable improvement required

Local Law
Benchmark ID

ER.1.1

Benchmark Details

Employers shall have in place written policies and practices and maintain proper and accurate records governing all aspects of employment from recruitment, hiring and probation, including written terms and conditions of employment, job descriptions, administration of compensation, and working hours for all positions, through to retrenchment and termination processes.

Finding Details

- a. The factory does not prepare job descriptions at all.
- b. The factory does not have a written policy on recruitment and hiring. There are some written procedures on recruitment; however, it does not include information on the employment of outsourced security guards, housekeeping, and canteen workers.
- c. The factory does not have written procedures on non-discrimination.
- d. The factory does not have written procedures on forced labor.
- e. The factory does not have written procedures on child labor.
- f. The factory does not have a written policy on termination and retrenchment. Written procedures do not provide complete information on the procedures that will be followed in case of termination and retrenchment. Procedures do not include the need to assign responsibilities and train employees on the policy and procedures.
- g. The factory has written procedures on compensation; however, it does not provide complete information on the calculation of wages and deductions that will be made from wages, overtime calculations, or information on leaves and bonuses. Procedures do not include the need to assign responsibilities and train employees on policy and procedures.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID

ER.6.1

Benchmark Details

Employers shall have written policies and procedures and implement practices that encourage ongoing training of all categories of workers with the goal of raising or broadening skills in order to advance in their careers within the factory or beyond.

Finding Details

The factory does not have written policies and procedures on personnel development that encourage ongoing training with the goal of raising or broadening workers' skills so they can advance in their careers.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement



**Compliance
Classifications**
Local Law

Sustainable improvement required

Benchmark ID

ER.5.1

Benchmark Details

Employers shall ensure that all supervisors are trained in national laws, workplace regulations, and the FLA Code, workplace grievance systems, and the appropriate practices to ensure compliance.

Finding Details

The factory does not provide any specific training to the relevant supervisors that includes all FLA's code elements and employment functions.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**
Local Law

Sustainable improvement required

Benchmark ID

ER.3.1

Benchmark Details

Employers shall provide an orientation to new employees at the time of hiring, which includes explanations of the employers' rules, compensation package and policies for human resources, grievance systems, industrial relations, including respect of the right to freedom of association, workers' rights and responsibilities, FLA Code of Conduct, health and safety, and environmental protection.

Finding Details

Code elements like child labor, forced labor, grievance systems, workplace conduct & discipline and environment are not included in the orientation program conducted for employees.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**
Local Law

Sustainable improvement required

Benchmark ID

ER.7.1

Benchmark Details	Employers shall have written policies and procedures with regard to performance reviews that outline the review steps and process, demonstrate linkages to job grading, prohibit discrimination, are provided in writing and seek feedback and agreement/disagreement from employees in writing, and that follow all local legal requirements.
Finding Details	a. The factory does not have policies and procedures on performance reviews that include steps and processes, linkages to job grading, nondiscrimination, written feedback, and compliance with legal requirement. b. The factory does not review the performance of workers or promote workers. Increments are provided based on verbal feedback from supervisors on performance and management decisions. Information on the amount of increment is communicated to the human resources team which implements the decisions taken by management.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.11.2
Benchmark Details	Employers must ensure the following minimum terms and conditions are met in the employment of contract/contingent/migrant/temporary workers: Contract/contingent/migrant/temporary workers shall be provided an employment agreement in their native language setting out the employment terms and conditions. for migrant workers, a copy of their employment contract in their native language shall be provided prior to departure from their country of origin;
Finding Details	The factory does not provide workers with a copy of their appointment letter. The review of appointment letters revealed that the signature of management (employer) was missing on the letters while the signature of worker was recorded. Legally, the letter should be signed by the employer and the employee to acknowledge acceptance of terms of employment.
Recommendations for Immediate Action	The factory must provide workers with a copy of their appointment letter duly signed by employer and employee.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law

No direct legal reference.

Benchmark ID

ER.17.1

Benchmark Details

Employers shall have a clear and transparent system of worker and management communication that enables workers to consult with and provide input to management. This might include suggestion boxes, worker committees, designated spaces for worker meetings, union representatives, and meetings between management and workers' representatives.

Finding Details

a. The chairman of the grievance committee is not designated and rotated every alternate year as legally required.

b. The factory does not have a written policy on the grievance system.

Written procedures on the grievance systems do not provide complete information on procedures to be followed for reporting grievances and steps for escalation and resolution.

c. The factory has provided four channels for reporting grievances; however, there is no evidence or systems in place to verify if the grievances are being handled effectively. Workers can report grievances using the suggestion box or approach the grievance committee, supervisors, and managers directly.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID

ER.19.2

Benchmark Details

All notices that are legally required to be posted in the workplace work areas shall be posted by employers.

Finding Details

Abstracts of acts and applicable minimum wage notification are not posted in the factory. The factory notice board is located near HR office on ground floor. Workers from other work areas located on upper floors do not visit the area regularly on a daily basis and hence may not be aware of notices posted.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID	ER.1.2
Benchmark Details	Employers shall assign responsibility for the administration of human resources to a clearly defined and adequately qualified staff member or staff members and ensure workers at all levels receive communication and training about existing policies and procedures or any revisions.
Finding Details	a. Workers working in the dormitory do not receive specific health and safety/hygiene training. b. The factory does not conduct specific training on the code of conduct for workers. Awareness is provided by reading the contents of the code of conduct aloud on work floors using a loudspeaker.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.1.3
Benchmark Details	Employers should implement an annual, review process with input from workers of all policies, procedures and their implementation to ensure they meet legal requirements and the FLA Workplace Code.
Finding Details	1. The factory's policies and procedures on all FLA's code elements and employment functions are not reviewed regularly. 2. Workers are not consulted or integrated in the decision-making process of aspects concerning the workplace and working conditions (e.g., creation or revision of policies and procedures, changes in production processes, hours of work, etc.).
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Harassment Or Abuse (H/A)

Benchmark ID	H/A.1.1
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Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment and abuse, including that which is gender-based
Finding Details	a. Penal consequences of harassment at the workplace are not posted in the factory. b. Sensitization programs are not conducted for all workers. In 2025, training was provided for one hundred thirty one (female workers) only out of a total of six hundred eighty six (355 female and 331 male) workers. Male workers were not included in the training programs at all. In 2026, training was not provided at all. c. The factory has designated the welfare officer, who is employed for six months, as presiding officer of the Internal Complaints Committee instead of designating a senior employee from the factory as legally required.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	H/A.8.3
Benchmark Details	Employers, shall develop, implement and monitor policy and procedures for eliminating the risk of violence, harassment, and abuse in the workplace. Policies and procedures shall include a clear statement that violence, harassment, and abuse will not be tolerated, procedures for the investigation of allegations, and measures to protect any complainants, victims, and witnesses.
Finding Details	The factory does not have a written policy on harassment or abuse, including a system to discipline supervisors, managers, and workers who engage in any form of harassment or abuse.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Health, Safety And Environment (HSE)

Benchmark ID	HSE.14.1
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Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	a. The belt guard is missing on one out of two round belt stitching machines, exposing the operator to risk of injury. b. Though a lightning protection system is installed in the factory, test reports were not available for review to verify if these were functional. c. The factory has not implemented a complete lockout-tag out maintenance safety system for all relevant equipment. d. The factory does not own any vehicles and uses external vehicles (cargo trucks) for its requirements. There is no system in place for verification to determine their ability to be driven safely. e. Traffic lanes and walk paths are not marked inside the factory.
Recommendations for Immediate Action	a. The belt guard must be installed on all round belt-stitching machines. b. Test reports of examination of lightning protection systems must be maintained and made available for review. c. The factory must implement a complete lockout-tagout maintenance safety system for all relevant equipment. d. The factory must have a system in place for periodic inspection and verification of vehicles used in the factory to determine their ability to be driven safely. e. Traffic lanes and walk paths must be marked inside the factory to ensure safety for human traffic.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	a. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances. b. Factories Act, 1948- Section 24 (3)- When a device, which can inadvertently shift from "off" to "on" position, is provided in a factory to cut off power, arrangements shall be provided for locking the device in safe position to prevent accidental starting of the transmission machinery or other machines to which the device is fitted.

Benchmark ID	HSE.18.1
Benchmark Details	Medical facilities shall be established and maintained in factories as required by applicable laws.
Finding Details	The factory has provided a first aid room and not a medical room as legally required. One nurse is available in the first aid room to provide basic first aid. In her absence there is no medically trained person available.

Recommendations for Immediate Action	The factory should provide a medical room as legally required.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 45 (4): In every factory wherein more than five hundred workers are ordinarily employed, there shall be provided and maintained an ambulance room of the prescribed size, containing the prescribed equipment and in the charge of such medical and nursing staff as may be prescribed and those facilities shall always be made readily available during the working hours of the factory.
Benchmark ID	HSE.5.1
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all of the following elements: posting evacuation plans; the installation and maintenance of fire alarms; the installation and maintenance of emergency lighting; ensuring aisles/exits are not blocked and that workers are not blocked within their workstations; employee education and training; and evacuation procedures and fire drills.
Finding Details	a. Fire resistant smoke-sealed doors are not installed at emergency exits. b. Directions for evacuation are marked on main passageways in work areas and not on passages from workstations. Hence, there is no clarity on the route to be followed for evacuation from workstations. c. Direction for evacuation near exit on ground floor points away from the exit.
Recommendations for Immediate Action	a. Fire resistant smoke-sealed doors should be installed at emergency exits. b. Directions for evacuation should be marked on passages from workstations to provide clarity on the route to be followed for workstation evacuation. c. Direction for evacuation near the exit on the ground floor should point towards the exit.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948- Section 38 (1) (a): In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain safe means of escape for all persons in the event of a fire.

Benchmark ID	HSE.28
Benchmark Details	Employers shall create a system to ensure that all necessary Health and Safety protections are provided for external contractors; including protection when working within , confined spaces, maintenance issues, and general Health and Safety Issues.
Finding Details	The factory does not provide safety information to contractors engaged in maintenance work.
Recommendations for Immediate Action	The factory should provide safety information to contractors engaged in maintenance work.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID	HSE.29
Benchmark Details	Employers shall provide all necessary protection for workers when working at heights, confined spaces, and other high-risk areas.
Finding Details	a. The entry points to confined spaces (underground water/sewage tanks) are covered; however, warning signs are not installed near confined spaces, and the confined spaces are not fenced to prevent movement of workers near the area. b. Safety measures (PPEs, safe atmosphere, rescue equipment ready to use, trained observer present) are not ensured when persons enter confined space for cleaning. c. Safety shoes, safety harnesses and helmets are not provided to maintenance workers who work at heights. d. Ladders and maintenance equipment like drilling machines and tools used by maintenance workers are not inspected at periodic intervals to ensure safety to users. Metal ladders are used for electrical maintenance work, which could be a risk of injury to workers.



Recommendations for Immediate Action	a. Warning signs should be posted near confined spaces, and the confined spaces should be fenced to prevent movement of workers near the area. b. Safety measures (PPEs) should be provided and usage should be monitored when persons enter confined space for cleaning. c. Safety shoes, safety harnesses and helmets should be provided to maintenance workers who work at heights. d. Ladders and maintenance equipment like drilling machines and tools used by maintenance workers should be inspected at periodic intervals to ensure safety to users. Metal ladders should not be used for electrical maintenance work, which could be a risk of injury to workers.
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Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

a. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

b. Factories Act, 1948- Section 36 (2) (b): No person shall be required or allowed to enter any confined space as is referred to in sub-section (1), until all practicable measures have been taken to remove any gas, fume, vapour or dust, which may be present so as to bring its level within the permissible limits and to prevent any ingress of such gas, fume, vapour or dust and unless such person is wearing suitable breathing apparatus and a belt securely attached to a rope the free end of which is held by a person outside the confined space.

Benchmark ID

HSE.30.1

Benchmark Details

Employers shall develop, maintain, and regularly review health, safety, and environmental policies to ensure that they comply with all national laws, regulations and the FLA Workplace Code concerning health, safety, and environmental standards, regulations and procedures.

Finding Details

The factory does not have written procedures on environmental protection.

Recommendations for Immediate Action

Recommendations for Sustainable Improvement

Compliance Classifications

Sustainable improvement required

Local Law

Benchmark ID	HSE.30.2.6
Benchmark Details	The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system including a HS&E risk assessment within which the following are clear and regularly tested and reviewed:protections to workers who allege health, safety, and environmental violations;
Finding Details	Risk assessment did not consider frequency and possibility when calculating risk. Hence the assessment is not complete.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	
Benchmark ID	HSE.5.1.4
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following: ensuring aisles/exits are not blocked and that workers are not blocked within their workstations
Finding Details	a. Multiple instances noted on production floors where evacuation routes are partially restricted by pillars, garment stands, packing cartons, and workstations. b. Additional leather stored in a container near the entrance to the factory was stored in a haphazard manner with no passages and access to the rear side maintained in between the rows. c. Workstations in the bag section were placed on the evacuation route. d. Workers in the garment inspection section were partially standing on a passage when working.
Recommendations for Immediate Action	a. Evacuation routes should be maintained clear at all times. b. Leather should be stored in a defined manner, maintaining clear passages and access to the rear end of the storage area. c. Workstations in the bag section should be relocated, and evacuation routes should be maintained clear at all times. d. Workstations in the garment inspection section should be realigned to ensure passages are maintained clear at all times.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	Factories Act, 1948- Section 38 (1) (a): In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain safe means of escape for all persons in the event of a fire.
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Benchmark ID	HSE.5.1.6
Benchmark Details	All applicable, legally required or recommended elements of safe evacuation shall be complied with, including all the following elements: evacuation procedures and fire drills
Finding Details	The factory does not conduct an assessment after the drill to learn how to improve the evacuation process.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	HSE.26
Benchmark Details	All dormitory facilities must be structurally sound, in good repair, and located separately from production, warehouse and hazardous chemical storage areas.
Finding Details	One shipping metal container is used as a dormitory for managers, and two such containers are used as dormitories for workers. The areas inside the containers are congested and do not allow adequate space for free and quick movement. This could be a risk for injuries during an emergency evacuation.
Recommendations for Immediate Action	Adequate living space should be provided in dormitories.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID	HSE.25.1
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Benchmark Details	Dormitory facilities, including those provided by employment agencies or intermediaries associated with the employer, shall meet all applicable laws and regulations related to health, safety, and environment, including fire safety, sanitation, risk protection and electrical, mechanical, and structural safety.
Finding Details	Toilets in the dormitories are poorly maintained with stain marks from spit stains of chewing tobacco. Four out of eight flushes checked at random were not functional.
Recommendations for Immediate Action	Toilets in the dormitories should be maintained clean at all times.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 19(1) (a) : In every factory, sufficient latrine and urinal accommodation of prescribed types shall be provided conveniently situated and accessible to workers at all times while they at the factory. Factories Act, 1948-Section 19(1) (d): All such accommodation shall be maintained in a clean and sanitary condition at all times.

Benchmark ID	HSE.25.1.1
Benchmark Details	All dormitories shall be kept secure, clean, and have safety provisions (e.g. fire extinguishers, first aid kits, unobstructed emergency exits, emergency lighting).

Finding Details

- a. Only one exit is provided in two out of the five rooms housing over twenty workers in each of the rooms in dormitory one (RCC building).
- b. Access to the fire hose at the entrance to rooms on the first and second floors is blocked by doors.
- c. Fire alarms, fire extinguishers and emergency lights are not provided in the staff dormitory housing managers and in the two rooms on first and second floors of worker dormitory one (RCC Building).
- d. Though a separate kitchen is provided for dormitory workers if they need to cook themselves, electric cooking stoves were seen the near beds of a few workers with cooked food stored. This could be a risk for fire.
- e. Waste leather/fabric storage area and liquified petroleum gas cylinders are stored adjacent to each other and against the wall of the container housing fifteen workers. This is a high risk to the lives of residents.
- f. Dormitories are not maintained clean. Food waste and other waste were seen left on open bins. Packets of chewing tobacco and burnt cigar ends were seen on the staircase and on floors in the rooms.
- g. One shipping metal container is used as a dormitory for managers, and two such containers are used as dormitories for workers. The areas inside are congested and do not allow adequate space for free and quick movement. This could be a risk in case of an emergency evacuation.

Recommendations for Immediate Action

- a. A second exit should be provided in two out of five rooms housing over twenty workers in each of the rooms in dormitory one (RCC building).
- b. The fire hose at the entrance to rooms on the first and second floors should be accessible at all times.
- c. Fire alarms, fire extinguishers, and emergency lights should be provided in the staff dormitory housing managers and in two rooms on the first and second floors of worker dormitory one (RCC Building).
- d. Cooking in living areas should be prohibited.
- e. Safe storage practices should be implemented for storage of waste leather/fabric in the storage area and liquified petroleum gas cylinders away from residential areas.
- f. Dormitories should be maintained clean at all times.
- e. Adequate living and movement space should be provided in dormitories.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID	HSE.23.1
Benchmark Details	Safe and clean drinking water shall be freely available at all times, within reasonable distance of the workplace. Drinking water shall be of a reasonable temperature. The means to drink water (e.g. cups) must be safe and sanitary and available in an appropriate number.
Finding Details	The drinking water station on ground floor is located outside and close to the male toilets. Foul odor from toilets could be sensed at the drinking water station.
Recommendations for Immediate Action	The drinking water stations should be located away from toilets.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 18 (1): In every factory effective arrangement shall be made to provide and maintain at suitable points conveniently situated for all workers employed therein a sufficient supply of wholesome drinking water. Factories Act, 1948-Section 18 (2): No such point shall be situated within six meters of any washing place, urinal, latrine, spittoon, open drain carrying sullage or effluent or any other source of contamination.

Benchmark ID	HSE.17.1
Benchmark Details	Workstations, including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains.
Finding Details	a. Rest areas are not provided for workers with standing jobs. b. Anti – fatigue mats are not provided to 70 % of workers with standing jobs. Some workers were seen standing and working bare-feet and few were using high heeled footwear. c. Workstations are not adjustable in height
Recommendations for Immediate Action	a. Rest areas should be provided for workers with standing jobs. b. Anti – fatigue mats should be provided all workers with standing jobs. c. Workstations should be adjustable in height
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	a. Factories Act 1948- Section 44 (1): In every factory suitable arrangements for sitting shall be provided and maintained for all workers obliged to work in a standing position, in order that they may take advantage of any opportunities for rest which may occur in the course of their work. b. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
Benchmark ID	HSE.22.1
Benchmark Details	All food made available to workers shall be prepared, stored, and served in a safe and sanitary manner in accordance with all applicable laws and international standards.
Finding Details	a. Workers handling food in the kitchen and when serving were not using hand gloves, hair caps, and nose masks, increasing the risk of contamination of food. b. Insect repellents are not installed in the kitchen and dining areas.
Recommendations for Immediate Action	a. Workers handling food in the kitchen and when serving should be provided with hand gloves, hair caps, and nose masks, and use should be monitored to reduce risk of contamination of food. b. Insect repellents should be installed in the kitchen and dining areas.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	a. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances. b. Tamil Nadu Factories Rules 1950 - CHAPTER V - 65 - Canteens- 7-The doors and windows of a canteen building shall be of fly-proof construction and shall allow adequate ventilation.
Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

Finding Details

- a. Sanitary pads are not provided for use by female workers, though it is legally required to provide pads in the female toilets.
- b. Internal inspection (hydrostatic test) of one compressor (pressure vessel) was conducted in 2023 and was due in 2025 (after two years), which was not conducted. This could be a risk for accidents.
- c. PPEs (safety shoes, hand gloves, aprons, and nose masks) are not provided to kitchen workers. Workers were seen using firewood as fuel to cook food. The firewood was emitting smoke with strong fumes, and workers were directly exposed to the smoke.
- d. The belt guard is missing on one out of two round belt stitching machines, exposing the operator to risk of injury.
- e. Needle guards are pushed upwards on approximately 50% of sewing machines in the garment division, rendering them ineffective in preventing injury to the fingers of sewing machine operators.
- f. Finger guards are not installed on snap buttoning machines and skiving machines.
- g. Information on lift capacity and warning signs restricting the use of the lift in case of fire is not posted in front of lifts.
- h. The factory does not provide training to health & safety committee members.

Recommendations for Immediate Action

- a. Sanitary pads should be provided for use by female workers.
- b. Internal inspection (hydrostatic test) of one compressor (pressure vessel) should be conducted within legally defined timelines.
- c. PPEs (safety shoes, hand gloves, aprons, and nose masks) should be provided to kitchen workers.
- d. A belt guard should be installed on the round belt stitching machine that is missing the belt guard.
- e. Needle guards should be maintained in place to prevent injury to the fingers of sewing machine operators.
- f. Finger guards should be installed on snap buttoning machines and skiving machines.
- g. Information on lift capacity and warning signs restricting use of the lift in case of fire should be posted in front of the lifts.
- h. The factory should provide training to health & safety committee members.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

a. Model Factories Rules, section 19 (3) and section 112 of Factories Act 1948 – Rule 44c- Sanitary napkins of adequate quantity conforming to Indian standards shall be provided and maintained in women’s toilet for their use and the same replenished on daily basis. (d) – Disposable bins with lids shall be provided within the women’s toilets for collection of used napkins. Used napkins shall be disposed off as per procedure approved by inspector.

b. 56 Pressure Plant - 7 Inservice test and examinations- Every pressure vessel or plant in service shall be thoroughly examined by a notified person (a) Externally, once in every six months;(b) internally, once in every twelve months. If by reason of the construction of a pressure vessel or plant, a thorough internal examination is not possible this examination may be replaced by a hydrostatic test which shall be carried out once in every two years.

c. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID

HSE.4.1

Benchmark Details

Employers shall at all times be in possession of all legally required and valid permits and certificates related to health, safety, and environmental issues, such as: Purchase and storage of chemicals; Fire safety inspections; Machinery inspections; Waste disposal; Environmental licenses/permits; Sanitation permits, including those required for canteens; and Vehicle inspection and driver permits for all employer provided transportation.

Finding Details

a. The factory obtained a license to accommodate two hundred fifty workers in a hostel. The accommodation referred to in the license states one “building”. While one hundred seventy workers are accommodated in the building comprising two floors for the residential area, an additional twenty two managers and fifteen workers are accommodated in two metal cargo containers. The factory has not obtained approval from local government authorities for this arrangement. The factory’s approved building plan does not include the two containers used as hostels for accommodating employees, and the factory has not obtained a building stability certificate for the two containers for use as hostels for accommodating employees.

b. Internal inspection (hydrostatic test) of one compressor (pressure vessel) was conducted in 2023 and was due in 2025 (after two years), which was not conducted. This could be a risk for accidents.

Recommendations for Immediate Action

- a. The factory should obtain approval and a stability certificate from local government authorities for the use of containers as a hostel to accommodate managers and workers.
- b. Internal examination of pressure vessels should be conducted at legally defined intervals.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

- a. Tamil Nadu Factories Rules, 1950 - CHAPTER I - 12B (3)
After the date of the commencement of the Act, no manufacturing process shall be carried on in any factory constructed, extended or taken in to use as a factory or part of a factory until a certificate of stability in respect of the buildings in the form below has been sent by the occupier or management of the factory to the Inspector.
- b. Tamil Nadu Factories Rules, 1950- 56. Pressure Plant- 7. In service test and examinations -Every pressure vessel or plant in service shall be thoroughly examined by a notified person (a) Externally, once in every six months; (b) internally, once in every twelve months. If by reason of the construction of a pressure vessel or plant, a thorough internal examination is not possible this examination may be replaced by a hydrostatic test which shall be carried out once in every two years.

Benchmark ID

HSE.7

Benchmark Details

Workers shall be provided at no cost with all the appropriate and necessary personal protective equipment (e.g. gloves, eye protection, hearing protection, respiratory protection) to effectively prevent unsafe exposure (e.g. inhalation or contact with solvent vapors, noise, dust) to health and safety hazards, including medical waste.

Finding Details

- a. Eye shields, safety shoes, hand gloves, and nose masks are not provided to carpenters.
- b Safety shoes and helmets are not provided to maintenance workers.
- c. Hand gloves were not provided to workers applying ink on products.
- d. Finger protection guards are not provided to workers operating snap button machines and logo embossing machines.
- e. Fall protection equipment is not provided to maintenance workers.

Recommendations for Immediate Action	a. Eye shields, safety shoes, hand gloves, and nose masks should be provided to carpenters. b. Safety shoes and helmets should be provided to maintenance workers. c. Hand gloves should be provided to workers applying ink on products. d. Finger protection guards should be provided to workers operating snap button machines and logo embossing machines. e. Fall protection equipment should be provided to maintenance workers.
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Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID

HSE.6.1

Benchmark Details

All safety and medical equipment (e.g. fire fighting equipment, first aid kits) shall be available in sufficient numbers throughout the workplace, maintained and stocked as prescribed, and easily accessible to workers.

Finding Details

- a. The people trained in handling firefighting equipment do not have the appropriate equipment to fight fires (correct PPE, breathing apparatus).
- b. The water hose pipe attached to the fire hydrant near the dormitory building was damaged, and the main nozzle was rusted.
- c. The contact information for medical response is posted on the notice board near the HR office on the ground floor and not throughout the factory.

Recommendations for Immediate Action

- a. The people trained in handling firefighting equipment should be provided with the appropriate equipment to fight fires (correct PPE and breathing apparatus).
- b. The water hose pipe attached to the fire hydrant near the dormitory building should be inspected periodically and maintained in operational condition at all times.
- c. The contact information for medical response should be posted throughout the factory.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

- a. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
 - b. Factories Act, 1948- Section 38 (1) (b): In every factory, all practicable measures shall be taken to prevent outbreak of fire and its spread, both internally and externally, and to provide and maintain the necessary equipment and facilities for extinguishing fire.
 - b. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
 - c. Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.
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Benchmark ID

HSE.19

Benchmark Details

All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical, and safety and health regulations.

Finding Details

- a. Soap and hand-drying facilities are not provided in the toilets.
- b. The kitchen is not kept clean. Dirt was noted on the walls, and the floors were not kept clean.
- c. The factory does not keep food samples at all to prevent food born illness.
- d. Medical tests have not been conducted for one out of three cooks working in the canteen to rule out contagious diseases.

Recommendations for Immediate Action

- a. Soap and hand-drying facilities should be provided in toilets.
- b. The kitchen should be maintained clean at all times.
- c. The factory should keep food samples to prevent food born illness.
- d. Medical tests should be conducted for cooks to rule out contagious diseases.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

- a. Factories Act, 1948-Section 19(1) (a) : In every factory, sufficient latrine and urinal accommodation of prescribed types shall be provided conveniently situated and accessible to workers at all times while they at the factory.
- b. Factories Act, 1948- Section 46(1): The state government may make rules requiring that in any specified factory wherein more than two hundred and fifty workers are ordinarily employed, a canteen or canteens shall be provided and maintained by the occupier for the use of the workers.
- c. The Tamil Nadu Factories Rules 1950 =- CHAPTER V- 67 A - Medical examination of Canteen Staff-Every member of the canteen staff who handles food stuffs shall be medically examined by the Factory Medical Officer or the Certifying Surgeon.

Benchmark ID

HSE.13

Benchmark Details

All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.

Finding Details

- a. Excessive lint was noted on the exhaust fans in the kitchen.
- b. Management has not conducted any assessments for determining thermal comfort problem areas.

Recommendations for Immediate Action

- a. The factory should ensure that all electrical installations are maintained clean at all times.
- b. Management should conduct assessments for determining thermal comfort problem areas.

Recommendations for Sustainable Improvement

Compliance Classifications

Immediate Action Required

Local Law

Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID

HSE.9.2

Benchmark Details

Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.

Finding Details

The factory does not provide training to workers working with chemicals; however some awareness is provided.

Recommendations for Immediate Action

The factory should provide training to workers who work with chemicals.

Recommendations for Sustainable Improvement

**Compliance
Classifications**

Immediate Action Required

Local Law

Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID

HSE.17.2

Benchmark Details

Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided.

Finding Details

The factory does not provide training to workers on ergonomics, including lifting techniques.

**Recommendations
for Immediate Action**

The factory should provide training to workers on ergonomics, including lifting techniques.

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Immediate Action Required

Local Law

Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances.

Benchmark ID

HSE.22.2

Benchmark Details

All workers handling food must be trained and/or certified to work in the facility preparing or serving food.

Finding Details

Workers working in the canteen do not receive specific health and safety/hygiene training.

**Recommendations
for Immediate Action**

Workers working in the canteen should receive specific health and safety/hygiene training.

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Immediate Action Required

Local Law

Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances

Benchmark ID

HSE.14.2

Benchmark Details

Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use.

Finding Details	a. The factory does not provide training to workers operating machinery; however, some awareness is provided. b. The factory does not provide safety training to designated workers with special/high-risk responsibilities (working with electrical issues, confined space, lockout/tagout, and working at heights).
Recommendations for Immediate Action	a. The factory must provide training to workers who operate machinery. b. The factory must provide safety training to designated workers with special/high-risk responsibilities (working with electrical issues, confined spaces, lockout/tag out, and work at heights).
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act, 1948-Section 7A (2b): Every occupier should have arrangement in the factory for ensuring safety and absence of risk to health in connection with the use, handling, storage and transport of articles and substances

Benchmark ID	HSE.6.2
Benchmark Details	A sufficient number of workers shall be trained in first aid and firefighting techniques. Training shall be upon hire and with periodic refresher training.
Finding Details	Responsibilities are not assigned to the factory's firefighting team. Instructions on the use of equipment are provided, but specific responsibilities are not assigned, like monitoring the evacuation process, informing local administration (government fire department, police, hospital, and top management).
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	HSE.5.3
Benchmark Details	Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually.

Finding Details	a. Review of logs of evacuation drills conducted in July 2025, September 2025, November 2025, January 2026 and March 2026 revealed that pictures from drills conducted in July 2025 and September 2025 are similar and pictures from drills conducted in November 2025, January 2026, and March 2026 are similar. It appears drills are not conducted as reported in the logs; however, documentation is maintained to comply with legal requirements on intervals for conducting drills. b. Evacuation drills are not conducted at all in the dormitories.
Recommendations for Immediate Action	a. The factory should ensure evacuation drills are conducted at intervals legally defined and logs maintained with accurate information. b. Evacuation drills should be conducted in the dormitories.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	The Tamil Nadu Factories Rules 1950- Rule 67 -Fire protection -12 c-Personnel in-charge of equipment and for firefighting, fire drills, etc - Firefighting drills shall be held as often as necessary and at least once in every period of two months.

Benchmark ID	HSE.14.3
Benchmark Details	Employers shall ensure safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers.
Finding Details	Safety instructions are not displayed or posted near machinery at all.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	HSE.5.4
Benchmark Details	The emergency evacuation plan (EEP) includes procedures for notifying local community authorities in case of accidental discharge or release of chemical/waste products or any other environmental emergency.
Finding Details	The factory does not have an emergency preparedness plan in place to deal with environmental emergencies like the accidental discharge of gas.
Recommendations for Immediate Action	

**Recommendations
for Sustainable
Improvement**
**Compliance
Classifications**
Local Law

Sustainable improvement required

Hours Of Work (HOW)

Benchmark ID HOW.11.1

Benchmark Details Employers shall provide workers with paid annual leave as required under national laws, regulations and procedures.

Finding Details Unused earned leave from a calendar year (January to December) for four hundred fifty workers from the garment division is carried over to the following year as legally required; however for two hundred fifty workers from the hard goods division, wages for unused leave from a calendar year are paid in the following year. The practice of paying wages for unused leave does not comply with legal requirements. The practice discourages workers from using their leave, and also with periodic revisions in wages, the practice impacts the amount of termination dues when they leave employment. Workers would receive higher amounts if paid upon leaving their employment, compared to the amount they are paid annually.

**Recommendations
for Immediate Action** The factory must comply with legally provided guidelines on earned leave.

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications** Immediate Action Required

Local Law Factories Act 1948, Chapter VIII- Annual Leave with wages- Section 79 (5) - If a worker does not in any one calendar year take the whole of the leave allowed to him under sub-section (1) or sub-section (2), as the case may be, any leave not taken by him shall be added to the leave to be allowed to him in the succeeding calendar year: Provided that the total number of days of leave that may be carried forward to a succeeding year shall not exceed thirty in the case of an adult or forty in the case of a child.

Benchmark ID HOW.22.1

Benchmark Details Employers shall have in place policies for managing all working hour, overtime, and leave records in normal and exceptional circumstances.

Finding Details The factory does not have written procedures on hours of work.



**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Sustainable improvement required

Freedom Of Association And Collective Bargaining (FOA)

Benchmark ID

FOA.1.1

Benchmark Details

Employers shall comply with all national laws, regulations and procedures concerning freedom of association and collective bargaining. national laws, rules, and procedures protecting the rights of workers to organize and bargain collectively. Where local laws and FLA standards differ, the employer is expected to follow the highest applicable standard.

Finding Details

The factory does not have written procedures on freedom of association.

**Recommendations
for Immediate Action**

**Recommendations
for Sustainable
Improvement**

**Compliance
Classifications**

Local Law

Sustainable improvement required