



Member(s) MEC Mountain Equipment Company Ltd
Country Indonesia
Date of Inspection 5/29/2023
Additional CAP Notes

FLA Assessment Corrective Action Plan

Summary of Corrective Actions Taken or Planned

Benchmark ID	Benchmark details	Question(s)	Finding details	Recommendation for Immediate Action	Recommendation for Sustainable Improvement	Company Plan of Action	Company deadline (MM-DD-YYYY)	Action Taken	Company Progress Status
C.1.1	Employers shall comply with all national laws regulations and procedures concerning the payment of compensation to workers.	Applicable to compensation is the factory in compliance with the local legal requirements/ FLA Code in all other areas not previously noted?	(1) The factory does not provide certain benefits and compensation elements equally for all workers leading to a risk of discrimination. - Most workers (cutting QC finishing packing and warehouse) receive an attendance incentive ("Permi kerajinan") but none of workers in sewing department receive this incentive. - The amount of the attendance incentive is solely determined by the head of each department. There are no criteria or scales in place to determine the amount leading to some workers receiving a much higher attendance incentive than others without clear reason. For instance the assessment observed 2 QC workers who have equal years of service were both promoted almost at the same time to become QC leaders and have the same results on their performance review. One of these workers received an attendance incentive of IDR 19300/day (approx USD 1.30) while the other received only IDR 1220/day (approx USD 0.08). (2) Female workers who work the 2nd shift departing at	(1) Provide equal benefits to all workers at the same position unless the differing amount is based on documented criteria such as seniority job title or performance review result. (2) Provide transportation to female workers traveling to/from work between 11:00pm and 05:00am as required by law.		10/6/23: 1. The factory identifies the lack of complete procedures to ensure compliance. The factory will review discuss with internal stakeholders update finalize procedures and train staff upon completion. 2. The factory has adjusted the working hours for the second shift to end at 11:10 pm rather than 11:00pm. The Company will work with the factory to ensure that the corrective actions fully address the finding and that transportation to female workers traveling to/from work between 11:00pm and 05:00am is provided as legally mandated.	03-22-2024		Planned
ER.1.1	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.	Does the factory have policies and procedures governing all aspects of termination and retrenchment?	There are no policies or procedures governing retrenchment.			10/6/23: The factory will create policies and procedures regarding retrenchment. The Company recommends that the factory review best practices (examples to be provided by the Company) draft policies and procedures discuss with internal stakeholders finalize policies and procedures and train staff upon completion.	03-22-2024		Planned

ER.1.2	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.	Does the factory provide any ongoing training to workers on all FLA's Code elements and Employment Functions?	There are no ongoing trainings to workers covering FLA's Code elements and Employment Functions. As of the time of the assessment (a) There were no such trainings on workplace standards conducted in past 12 months. (b) The last such trainings were in March 2022 and were attended by only 184 workers and supervisors out of 1479 employees. The training covered recruitment working hours compensation & benefits leave social insurance (BPJS) freedom of association and grievances. There was no information on the FLA or company code of conduct personnel development or termination & retrenchment.	10/6/23: The factory will create an annual training schedule so related departments are aware of required regular trainings. The factory will include the Company Code of Conduct in these trainings.	10-20-2023		Planned
ER.1.3	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.	Are the factory's policies and procedures on all FLA's Code elements and Employment Functions regularly reviewed?Are workers consulted or integrated in the decision-making process of aspects concerning workplace and working conditions (e.g. creation or revision of policies and procedures changes on production processes hours of work etc.)?	1. The factory does not have policies or procedures for reviewing internal documents. As a result the factory does not conduct a regular review process to make sure that all policies and procedures are updated according to changes in local law regulations/FLA code and internal/external audit results. 2. The factory has not established procedures to request and/or receive workers' input/feedback regarding the creation implementation and updating of its policies and procedures. Workers are neither systematically integrated nor consulted in decision-making processes.	10/6/23: 1. The factory will review their policies and procedures and develop a mechanism to ensure accountability for regular review. 2. The factory will review their current practices for receiving input from workers including through the HR department and labour union on a monthly basis. The factory will establish procedures to integrate worker input/feedback into the creation implementation and updates for its policies and procedures.	10-27-2023	1. The factory has reviewed their current policy on updating internal documents and note the gap in implementation.	In Progress
ER.17.5	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.	Is there evidence that management reviews compliants and grievances and takes appropriate action?	The factory's grievance procedures and practices do not meet FLA Code standards and the assessment found that the factory's response to grievances is inadequate. (1) According to the factory's grievance procedure the suggestion box should be opened once a month. Opening the box only once a month poses a risk of waiting too long to respond to sensitive issues. (2) Four grievances were lodged in February 2023 complaining of uncomfortably high temperatures in the free metal room. Grievances lodged in December 2022 mentioned the lack of space in the canteen due to unused sewing machines being stored there. Other grievances in December 2022 requested that the factory provide transportation for female workers on the 2nd shift for safety reasons. There were no responses from factory management for any of those 3 issues.	(1) Check and open the grievance boxes at least on a weekly basis. Maintain records of opening the box. (2) Follow up on all grievances and communicate the resolution of grievances to workers.	10/6/23: 1. The factory will update the grievance procedure to check the suggestion box once per week and assign the HR-GA manager responsibility to maintain this cadence. 2. The factory will address each of these compliants. Solutions for temperature control have been piloted and the factory will continue to find the best solution. The machines which blocked the extra space in the canteen will be removed. The working hours for second shift will be adjusted to ensure workers are able to travel to and from work safely. The Company will work with the factory to review and improve their grievance mechanism including appropriate timelines and documentation for resolution.	12-29-2023	In Progress
ER.17.6	Employers shall have a system in place to prevent retaliation against or discrimination towards workers who are filing grievances including harassment abuse violations of factory procedures compensation or unsafe working conditions	Does the factory have a system in place to prevent retaliation against or discrimination towards workers who are filing grievances regarding harassment abuse violations of factory procedures compensation or unsafe working conditions?	The factory does not have a policy or procedure on anti-retaliation. There is no system in place to prevent retaliation against or discrimination towards workers who are filing grievances including harassment abuse violations of factory procedures compensation unsafe working conditions and raise health safety or environmental concerns.	10/6/23: The factory updated the grievance policy to include anti-retaliation measures. The Company requested additional documentation to verify and requests that the updates undergo worker consultation and upon finalization training to all workers be conducted.	10-27-2023		In Progress

ER.18.4	The disciplinary system shall include a third party witness during imposition and an appeal process.	Do the disciplinary procedures or existing documents include workers' right to appeal the disciplinary action and workers' ability to have a third party witness during the imposition of disciplinary actions?	The factory's disciplinary procedures do not include workers' right to request a witness or their right to file an appeal of disciplinary action.		10/6/23: The factory will update the disciplinary policy to include the workers' right to request a witness or their right to file an appeal. The Company requests that the updates undergo worker consultation and upon finalization training to all workers be conducted.	12-17-2023	Planned
ER.18.6	The workplace shall commit to non-retaliation for all steps of the disciplinary process including for a worker requesting a witness and filing an appeal of disciplinary action.	Does the factory commit to non-retaliation for disciplinary process including if a worker requests a witness and filing an appeal of disciplinary action?	The factory does not have policies or procedures for anti-retaliation. As a result the factory has not established a written factory commitment to non-retaliation during the disciplinary process guaranteeing that workers will not face retaliation should they request a witness or file an appeal of disciplinary action.		10/6/23: The factory will update the the grievance policy to include an anti-retaliation clause. The Company requests that the factory also included anti-retaliation clauses in the the disciplinary procedures. The Company also requests that the policy updates undergo worker consultation and upon finalization training to all workers be conducted.	10-20-2023	Planned
ER.2	Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers including migrant juvenile contract/contingent/temporary probationary workers home workers and pregnant or disabled workers are implemented. Where local laws and FLA standards differ the employer is expected to follow the highest applicable standard.	Has the factory complied with all mandated requirements applicable to special categories of workers (including migrant juvenile contract/contingent/temporary home workers or disabled workers)?	There are only 10 workers with disabilities out of a total of 1479 employees at the factory which is not in full compliance with local law. Local law requires that one person with disabilities be hired per 100 employees. Thus for a factory with 1479 employees in total the factory should hire at least 15 workers with disabilities.	Establish a program to provide training and employ more workers with disabilities.	10/6/23: The factory will coordinate with the community labor department and education institutions to address this gap. The factory will provide job training for individuals with disabilities who wish to work in the garment industry.	12-29-2023	
ER.3.1	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.	Does the orientation Training to new workers cover all FLA's Code elements and Employment Functions? (Company Code elements are accepted if FLA Codes are fully covered)	There are no records or other evidence available to indicate that the orientation training for new workers covers all FLA Code elements and Employment Functions.		10/6/23: The factory recognizes that while the records to verify the training were unavailable there are regular trainings for new workers. The factory will establish record-keeping procedure for new employee training and retain records appropriately. The Company will review documents for verification.	12-17-2023	Planned
ER.4	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.	Does the factory provide regular communication to workers on all FLA's Code elements and Employment Functions?Is the FLA Code made available/communicated to the workers?	The factory does not provide regular communication to workers on all FLA Code elements and Employment Functions.		10/6/23: The factory will create an annual training schedule so related departments are aware of required regular trainings rather than its former practice of socializing the Code of Conduct through the workers' union. The factory will include the Company Code of Conduct in these trainings.	12-29-2023	Planned
ER.5.1	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.	Does the factory provide any specific training to the relevant supervisors that includes all FLA's Code elements and Employment Functions?	There is no specific training for supervisors that includes all FLA Code elements and Employment Functions. The last relevant trainings were in March 2022 and attended by 184 workers and supervisors to discuss recruitment working hours compensation & benefit leave social insurance (BPJS) freedom of association and grievance mechanisms. The factory does not have a copy of the FLA Workplace Code of Conduct.		10/6/23: The factory will create an annual training schedule so all supervisors are aware of required regular trainings. The factory will include the Company Code of Conduct in these trainings and establish a control system to ensure the schedule is followed.	12-29-2023	Planned

ER.6.1	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.	Does the factory 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?	There are no 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.		10/6/23: The factory recognizes the gap in personnel development for career paths. The factory will establish trainings. The Company recommends the factory seek worker feedback on trainings to understand effectiveness and improve accordingly.	12-29-2023	Planned
ER.7.1	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.	Does the factory have policies and procedures on performance reviews that include steps and processes linkages to job grading nondiscrimination written feedback and compliance with legal requirement? 12300ntestDoes the factory conduct performance reviews for all workers?	The factory has no policies or procedures on performance reviews to include steps and processes linkages to job grading nondiscrimination written feedback and compliance with legal requirements. In practice the factory conducts performance reviews only for non-sewing workers who will be promoted not for all workers.		10/6/23: The factory will carry out reviews for job performance for all personnel and draft procedures. The factory will seek worker consultation on the procedures. The Company recommends that after consultation is completed and the procedures are finalized the factory train all workers on the new procedure.	12-29-2023	Planned
ER.9.1	Employers shall hire contract/contingent/temporary workers only if such hiring is consistent with the national law of the country of production.	Does the factory use contract/contingent/temporary workers consistently with the law?	Based on employment records approx. 39 out of 1479 workers are employed under a fixed-term contract (PKWT) even though they are working permanent jobs in the warehouse sewing quality control and finishing sections.	Hire all workers whose jobs at the factory are permanent as permanent workers rather than using fixed-term contracts.	10/6/23: The factory will hire employees who are not working seasonally according to Indonesian law. The Company recommends that the factory include all workers whose work is permanent be hired on permanent contracts.	03-22-2024	In Progress
ER.9.2	Employers shall have in place written policies and procedures regulating the recruitment and hiring of contract/contingent/temporary workers.	Does the factory have policies and procedures on recruitment and hiring of contract/contingent/temporary workers?	There are no policies and procedures for the recruitment and hiring of contract/contingent/temporary workers.		10/6/23: The factory will review their policies for hiring and recruitment to include provisions for contract/contingent/temporary workers. The Company also requests that the policy updates undergo worker consultation and upon finalization training to all workers be conducted.	03-22-2024	Planned
HSE.1	Employers shall comply with all national laws regulations and procedures concerning health safety and the environment.	Applicable to Health Safety and Environment is the factory in compliance with the local legal requirements/ FLA Code in all other areas not previously noted?Has the factory taken proper steps to ensure that workers are not exposed to asbestos?	(1) Unused sewing machines are stored in the canteen area occupying approximately 40% of the space. As a result there are insufficient seats and tables for workers to have meals in canteen. (2) The factory has not conducted an asbestos assessment. As a result there are no labels for materials in the factory potentially containing asbestos.	(1) Provide adequate seats and tables for workers to have meals in canteen. Move unused sewing machines out from canteen area. (2) Engage with properly certified experts to conduct an asbestos assessment and put labels on any material in the factory containing asbestos.	10/6/23: 1. The factory will remove the unused or unneeded machines and ensure that the department in charge of removing unused machines stores them elsewhere. The company requested photo verification to confirm the actions are completed. 2. The factory has requested approval from top management to carry our an assessment by certified experts. Following the assessment the factory will label anything containing asbestos as required.	12-29-2023	In Progress
HSE.13	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.	Has management conducted any assessments for determining thermal comfort problem areas?In general does the factory have fans air conditioning ventilation heating or other systems in place to ensure that workers are not feeling overheated or underheated?	(1) There have been no assessments for determining thermal comfort problem areas in the sewing area of building 1 and the cutting building. (2) The temperature in the sewing area of building 1 and the cutting building reached 34 degrees Celsius during the visit at noontime. This was confirmed by checking the daily temperature log. Some sewing operators were observed using their own portable electric fan placed on the sewing table.	(1) Conduct assessments for determining thermal comfort problem areas in the sewing area of building 1 and the cutting building (2) Ensure that the temperature remains comfortable and below 30 degrees Celsius in all working areas. Provide sufficient ventilation and install adequate fans in the sewing area of building 1 and the cutting building.	10/6/23: 1. The factory has assessed options to reduce the heat in these areas given the high local temperatures. The factory plans to improve the existing cooling system to reach its maximum potential. 2. The factory carried out an evaluation to increase air circulation with a water cooling system. The factory will also continue to record and analyze temperatures periodically. The Company recommends that the factory conduct regular monitoring of the temperatures and seek worker feedback on the reduction techniques.	12-23-2023	In Progress

HSE.14.1	All production machinery equipment and tools shall be properly guarded and regularly maintained.	Are traffic lanes and walk paths clearly marked?Has the factory implemented a complete lockout-tagout maintenance safety system for all relevant equipment?	(1) The factory's traffic lanes and walking paths are not marked. (2) The factory does not have procedures for lockout-tagout nor has the factory implemented a complete lockout-tagout maintenance safety system.	(1) Mark the ground to indicate walking paths and traffic lines from the factory's main gate. (2) Establish procedures on lockout/tagout and implement them whenever relevant equipment is being maintained.	10/6/23: 1. The factory will review the existing paths and mark with special lines. The factory will monitor continued maintenance through internal health and safety audits. 2. The factory will equip the lockout/tagout procedure with a padlock. The factory will monitor continued maintenance through internal health and safety audits.	12-29-2023	In Progress
HSE.14.2	Workers shall receive training in the proper use and safe operation of machinery equipment and tools they use.	Does the factory provide safety training to designated workers with special/high-risk responsibilities (working with laser radiation or electrical issues confined space lockout/tagout work at heights)?	Workers with special/high-risk responsibilities such as work in confined space or work requiring lockout/tagout are not provided with safety training.	Provide safety training for designated workers with special/high-risk responsibilities including confined space and lockout/tagout.	10/6/23: The factory has scheduled the training for workers with special/high-risk responsibilities. The factory will carry out the training at regular intervals and include it in the annual training calendar.	12-29-2023	In Progress
HSE.16	Workers shall not suffer any negative consequences for refusing to work with machinery equipment or tools that are not properly guarded or reasonably considered unsafe.	Have workers been communicated their right to refuse to perform work under unsafe conditions?Are workers able to refuse to work under unsafe conditions?	The factory does not have procedures for workers to refuse to perform work under unsafe conditions. As a result workers have not been communicated their right to refuse to perform work under unsafe conditions.		10/6/23: The factory will create procedures for workers to refuse to work in unsafe conditions. The Company also requests that the policy updates undergo worker consultation and upon finalization training to all workers be conducted.	12-29-2023	Planned
HSE.18.1	Medical facilities shall be established and maintained in factories as required by applicable laws.	Are there clinic or medical facilities at the factory as legally required?	The factory's lactation room is accessed through the clinic room in building 1 which exposes those using the lactation room to potential contamination from sanitary hazards in the clinic.	Ensure that the lactation room is not within the clinic room and at a minimum includes: (a) minimum size of 3x4 m2 potentially to be increased according to number of women who are using it; (b) a door that can be locked which is easily opened/closed; (c) floor tile/cement/carpet; (d) ventilation and sufficient air circulation; (e) free of potential hazards in the workplace including pollution; (f) fairly quiet environment away from noise; (g) indoor lighting that is not overly bright; (h) humidity ranged between 30-50% maximum 60% and (i) available sink with running water for hand washing and washing equipment.	10/6/23: The factory will evaluate alternative spaces for the lactation room to ensure legal compliance. The company requests an update on the factory's action plan to identify a space and move the lactation room.	02-22-2024	In Progress
HSE.29	Employers shall provide all necessary protection for workers when working at heights confined spaces and other high-risk areas.	Does each confined space have appropriate protections to ensure that there is no unauthorized entry including signs?Do high work areas (higher than 18 meter) have fall protection (walls fences or other barriers) and are they properly marked?Is the factory making efforts to protect maintenance workers from the risks related to their jobs including special/dangerous tasks?	(1) The factory has not officially determined which areas of the premises are considered to be confined spaces. Furthermore the confined spaces are not marked with a ""do not enter without permit"" sign to ensure that there is no unauthorized entry. The assessor observed that the water tanks and manhole water sewer should be considered confined spaces. (2) Elevated work areas (such as the water storage area and the boiler chimney) are not properly marked with signs to warn of hazards and require PPE. (3) There is no safety rod present at the electrical panels to help push or pull someone away from electrocution.	(1) Identify confined spaces and mark all confined spaces with warning signs prohibiting unauthorized entry. (2) Post hazard signs and signs requiring PPE on all elevated work areas including water storage and the boiler chimney. (3) Provide a safety rod at every electrical panel.	10/6/23: 1. The factory has identified confined spaces but recognizes there was not signage stating ""do not enter without permit"". The factory will mark each area with these signs and monitor for continued maintenance through Internal Health and Safety audits. 2. The factory recognizes that there was not a sign to warn of the hazards for these areas only chains to restrict access. The factory will install hazard signs accordingly and monitor for continued maintenance through Internal Health and Safety audits. 3.The factory will install the safety rod at electrical panels accordingly and continue practices to always use PPE.	02-22-2024	In Progress

HSE.30.2.6	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;	Do the procedures include protection against retaliation for workers who raise health safety or environment concerns?	The factory does not have a policy or procedure to protect workers who file health safety or environmental concerns. Please review ER.17.6 for further details.		10/6/23: The factory recognizes the suggestion box labor union or other means of compliants are available for workers. The Company recommends that the factory include specific provision in the greivance policy that workers will not face retaliation for placing a compliant and include in the health safety and environment policy that workers may use the regular grievance channels to files complaints and will not be retailated against. The Company also requests that the policy updates undergo worker consultation and upon finalization training to all workers be conducted.	12-15-2023	In Progress
HSE.5.1	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.	Does the factory prohibit smoking within 15 meters (~50 ft.) of all closed areas?Are emergency exit/aisles sufficiently available?	(1) The factory does not have procedures to prohibit smoking or post signs to prohibit smoking within 15 meters (~50 ft.) of all closed areas. (2) Two aisles in the finished goods warehouse of building 2 were obstructed by boxes during the assessment.	(1) Establish policies/procedures prohibiting smoking within 15 meters (~50 ft.) of all closed areas and post signs to this effect in the appropriate language/s. (2) Ensure all aisles are clear of any obstructions.	10/6/23: 1. The factory will install signage to delineate what areas are ""smoking areas"" and ""no smoking areas"". The factory acknowledges that the current smoking areas were agreed to in a meeting between the labor union and the management. The Company recommends the factory review the legal requirements to ensure their health and safety procedures are compliant and the areas designated for smoking meet these requirements. The Company recommends that the factory management and labor union discuss the legal requirements and ensure that their agreement is compliant. 2. The factory will move the goods remind the supervisor to ensure trainings are sufficient and the implementation of health and safety requirements and ensure workers are all trained on the proper procedure.	10-27-2023	In Progress
HSE.5.1.2	All applicable legally required or recommended elements of safe evacuation shall be complied with including all the following elements: installation and maintenance of fire alarms;	Is the emergency alarm automatic and centralized?	The centralized fire alarm at the factory is not functioning properly (a) When a fire alarm button is pulled the control panel indicator that should identify the location of the pulled alarm is not functioning; (b) The fire alarm in the cutting building of factory 1 is not integrated into the factory's centralized fire alarm system; (c) There is no record of the factory testing the fire alarm the backup battery or the control panel to ensure that they are functioning.	Ensure that centralized fire alarms cover all buildings and that the location indicator in control panel is properly functioning. Ensure an adequate backup battery.	10/6/23: The factory will install the centralized fire alarm covering the entire building which includes location indicators on the control panel and has adequate battery backup. The Company requests these actions be done immediately as this could result in severe harm to workers if not corrected. The Company also requests that the factory include the centralized fire alarm in their regular health and safety monitoring and maintain documentation to verify.	12-29-2023	In Progress
HSE.5.1.3	All applicable legally required or recommended elements of safe evacuation shall be complied with including all the following elements: installation and maintenance of emergency lighting	Are exit signs lighted when the power goes out?	The factory does not regularly check and service the emergency lights above the exits. Three out of five randomly-selected emergency lights were not working when they were tested. These non-functioning emergency lights are located at the exits from the sewing section to the canteen from the sewing section to the cutting building and the cutting building's exit.	Ensure that all emergency lights above the exits are regularly checked and serviced and replace immediately if not functioning.	10/6/23: The factory will repair the emergency lights and ensure weekly monitoring for battery levels and proper function.	10-27-2023	In Progress
HSE.5.1.6	All applicable legally required or recommended elements of safe evacuation shall be complied with including all the following elements: evacuation procedures and fire drills	Is there an assessment after the drill to learn how to improve the evacuation process?	There is no assessment after fire/evacuation drills to learn how to improve the evacuation process.	Conduct assessments after drills to learn how to improve the evacuation process.	10/6/23: The factory has updated the agenda and training report to include training evaluation and will implement in future trainings. The Company will verify the remediation through document and photo review after implementation.	10-27-2023	In Progress

HSE.6.1	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.	Does the fire brigade have the appropriate equipment to fight fires (correct PPE breathing apparatus)?Does the factory have sufficient and adequate fire fighting equipment (fire extinguishers hoses sprinkler system fire pump)?	(1) The firefighting team is not provided with appropriate equipment to fight fires such as breathing apparatuses fire blankets helmets hoods & face protection goggles & safety glasses and gloves. (2) There is no fire hydrant installed at the factory. (3) The sprinkler/fire suppression system is insufficient. There is no adequate sprinkler system nor a substitute such as a thermatic fire extinguisher installed at important areas such as the warehouse finished goods warehouse chemical warehouse or temporary hazardous waste storage. Furthermore there is only one thermatic fire extinguisher installed in the fabric and finished goods warehouse which is insufficient for the size of the area (250 square meters).	(1) Provide the firefighting team with appropriate equipment to fight fires such as breathing apparatuses fire blankets helmets hoods & face protection goggles & safety glasses and gloves. (2) Install a fire hydrant at factory. (3) Install sprinkler systems or adequate thermatic fire extinguishers in all buildings. Adequate equipment should be determined through a fire risk assessment conducted by a qualified expert.	10/6/23: 1. The factory will acquire all required equipment for the firefighting team and store it in the production area. The Company recommends that the factory develop a regular procedure to monitor that all equipment remains in its proper location and in good condition so it will be prepared in event of a fire. 2. The factory management is discussing this issue. The Company requests that the factory review the legal requirements and ensure alignment. The Company also requests that the factory share the management decision with the Company. 3. The factory has installed additional thermatic fire extinguishers in the warehouse. The Company requests the factory also consider undergoing a fire risk assessment conducted by a qualified expert.	02-29-2024	In Progress
HSE.7	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.	Is PPE in good condition and replaced when needed?Is PPE stored appropriately?	(1) At least four mechanics do not have adequate safety shoes as the provided safety shoes are broken. There are 14 mechanics and 1 general worker required to wear safety shoes. (2) The assessment found holes in two randomly-checked mesh metal cutting glove used by cutters. (3) The respirator available in the hazardous and toxic waste (B3 materials) storage room is not kept in a plastic zip-lock to prevent dust.	(1) Provide new safety shoes when they are damaged. (2) Provide new mesh metal cutting gloves to cutting operators that have defects/broken gloves. (3) Store respirators in a plastic zip-lock bag to prevent dust. Record each usage of the respirators to ensure they are replaced on time.	10/6/23: 1. The factory has directed the purchasing department to procure better quality safety shoes as the previously used safety shoes were damaged easily. The factory will monitor for compliance through regular personal protective equipment inventory. 2. The factory recognizes that the operators did not report the holes in the gloves. The factory will replace with new metal gloves and monitor the suitability of PPE daily. The Company also recommends that the factory train personnel to monitor their own equipment and how to report to supervisors or management when equipment is damaged or needs to be replaced. 3. The factory has installed additional thermatic fire extinguishers in the warehouse. The Company requests the factory also consider undergoing a fire risk assessment conducted by a qualified expert.	12-29-2023	In Progress
HSE.8	Workers shall be provided with training on the use and maintenance of personal protective equipment. Training shall be upon hire with periodic refresher training offered to all workers. Management will ensure use of PPE as necessary.	Does the factory provide training to all workers regarding PPE usage and maintenance?	There have been no trainings on PPE usage and maintenance in 2023. The last such trainings were held June 30 2022 for 20 workers and August 15 2022 for 14 workers. As a result few workers have received this training.	Provide ongoing training on PPE usage and maintenance to all workers.	10/6/23: The factory will continue the regular PPE trainings and develop a mechanism to increase the number of participants. The factory will also monitor the number of participants to ensure all workers receive training.	10-27-2023	In Progress