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)	Delta Galil Industries Ltd. - 21
Country	India
Assessment Date	7/15/2026
Assessment Company	InSync Global - 200003

Workforce Summary

Number of Workers	1639
Percentage female	90 %
Primary Languages	

Wage Data information

Monthly minimum wage in country at time of assessment	The legal monthly minimum wage in Chitradurga, India in 2025 is 15,702 INR.
GLWC living wage benchmark for the country or relevant region at time of assessment	The GLWC living wage net benchmark for Tamil Nadu, India in 2025 is 18,523 INR. The GLWC living wage gross benchmark for Tamil Nadu, India in 2025 is 19,773 INR.

Assessment Summary

Violations per FLA Code Element	Violated Benchmarks
Nondiscrimination (ND)	0
Health, Safety And Environment (HSE)	33
Employment Relationship (ER)	11
Hours Of Work (HOW)	8
Harassment Or Abuse (HA)	0
Freedom Of Association And Collective Bargaining (FOA)	1
Forced Labor (F)	0
Child Labor (CL)	0
Compensation (C)	7

Violations per Category	Violated Benchmarks
Immediate Action Required	44
Sustainable Improvement Required	16
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	The factory hires workers for a six-month probation period. During this time, they receive the same legally mandated benefits offered to permanent workers. However, payouts for unused leave (which must be paid as part of terminal dues) are withheld if a worker resigns without prior notice. The factory applies this as a penalty for failing to provide notice. This practice does not comply with legal requirements; during the probation period, neither the employer nor the employee is required to provide advance notice prior to termination.
Recommendations for Immediate Action	Ensure that all terminal dues are paid in full to probationary workers without any illegal deductions or penalties.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	The Industrial Employment (Standing Orders) Central Rules, 1946, Rule 13 - Termination of employment-(2) No temporary workman whether monthly-rated, weekly-rated or piece-rated and no probationer or badli shall be entitled to any notice or pay in lieu thereof if his services are terminated.

Benchmark ID	C.12.1
Benchmark Details	All legally mandated deductions for taxes, social insurance, or other purposes shall be deposited each pay period in the legally defined account or transmitted to the legally defined agency. This includes any lawful garnishments for back taxes, etc.
Finding Details	Effective June 2026, the factory implemented the new 2019 wage code and calculated employee's contributions based on earned basic wage instead of earned gross wage towards the legally mandated benefit of the Employees State Insurance Scheme. The Wage code announced by the central government has not been officially notified by the local state governments for implementation as directed by the central government. E.g - Factory calculated at 0.75% of earned basic wage of INR 13970 which equals to INR 105 for a worker instead of calculating at 0.75% of earned gross wage of INR 15067 which equals to INR 113.00.

Recommendations for Immediate Action	The factory must comply with legal requirements on calculation of contributions towards legally mandated benefits as per notification issued by Ministry of labor and employment dated 13th June 2019 {GSR 423(E)}.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	According to Notification issued by Ministry of labor and employment dated 13th June 2019 {GSR 423(E)}- Employer contribution would be 3.25 % of wages earned by employee and employees' contribution would be 0.75% of wages earned with effect from July 1, 2019. Employees State Insurance Act 1948, Section 2(22)- "Wages "means all remuneration paid or payable in cash to an employee, if the terms of the contract of employment, express or implied were fulfilled and includes any payment to an employee in respect of any period of authorized leave, lock-out, strike, which is not illegal or layoff and other additional remuneration, if any, paid at intervals not exceeding two months but does not include—a) any contribution paid by the employer to any pension fund or provident fund or under this Act; b) any traveling allowance or the value of any traveling concession; c) any sum paid to the person employed to defray special expenses entailed on him by the nature of his employment; or d) Any gratuity payable on discharge.

Benchmark ID	C.15.1.4
Benchmark Details	Employers shall provide workers with a pay statement each pay period, and not less frequently than once a month, which shall include regular and overtime pay and the total number of hours worked.
Finding Details	Pay slip provided to workers does not include complete information on overtime pay and total number of hours worked including work done on rest days.
Recommendations for Immediate Action	Pay slip provided to workers should include complete information on overtime pay and total number of hours worked including work done on rest days.
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. Form XI suggests inclusion of all OT hours worked and OT compensation paid thereof in wage slip.
Benchmark ID	C.17
Benchmark Details	Employers shall ensure that all legally required payroll documents, journals and reports are available, complete, accurate and up-to date.
Finding Details	Official time and pay records did not match with the overtime hours worked and work done on rest days gathered during the assessment process. Specifically, a review of a leave application form gathered by assessors from the HR office noted that the worker was allowed leave on July 16 and 17, 2026 with the comments “Comp off – 23-11-2026 and 30-11-2026”. The year should read 2025 instead of 2026, as November 23 and November 30, 2025, were rest days (Sundays) on which the worker worked and was provided a compensatory off on July 16 & 17, 2026. Management denied working on any rest day, so work done on rest days is not reflected on time cards. Similarly, overtime hours worked beyond 1 hour a day are not reflected on time cards. These additional overtime hours are instead compensated by providing paid days off calculated at 8 hours of overtime = 1 day off. Though the provided time records are incomplete, the risk of all workers being impacted cannot be ruled out. Because these hours are unrecorded on time cards, payroll does not record compensation for the unrecorded work hours. The factory's practice of adjusting additional overtime hours with paid days is a legal violation, as overtime hours must be compensated at twice the daily wage rate. For work done on rest days, a compensatory paid rest day must be provided in addition to compensating the hours worked at overtime rates. The current practice results in the underpayment of workers and makes proper compensation is unable to verify.
Recommendations for Immediate Action	The factory must maintain records with complete information on working hours and compensation.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	THE PAYMENT OF WAGES ACT, 19361 - 13A. Maintenance of registers and records.— (1) Every employer shall maintain such registers and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed. Factories Act, 1948- Section 59 (1): Where a worker works in a factory for more than nine hours in any day or for more than 48 hours in any week, he shall, in respect of overtime work, be entitled to wages at the rate of twice his ordinary rate of wages. Minimum wages Central Rules 1950- Rule 23(4): An employee shall be granted for rest day wages calculated at the rate applicable to the next preceding day and in case he works on the rest day and has been given a substituted rest day, he shall be paid wages for the rest day on which he worked, at the overtime rate and wages for the substituted rest day at the rate applicable to the next preceding day.

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	1) When workers leave employment, irrespective of termination date, wages for days worked prior to leaving are paid in the pay period following their departure instead of being paid within 2 working days from date of leaving employment. 2) Payouts for unused leave are paid 45 days post-employment, instead of within 2 working days from leaving employment. 3) As a systematic practice, bonuses that form part of workers' terminal dues are only paid in November during the festival season. This practice does not ensure that workers who leave employment prior to November receive their bonus. Furthermore, it creates a high risk of non-payment due to workers migrating from the region or closing their bank accounts after leaving employment.
Recommendations for Immediate Action	The factory must comply with legally defined timelines for payment of terminal dues (wages for days worked prior to leaving employment and wages for unused leave). It is recommended that applicable bonus is paid to workers when they leave employment as part of terminal dues to ensure all dues are paid to workers.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	a).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. b).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.

Benchmark ID	C.3.1.3
Benchmark Details	Where probationary employment is legally allowed, no workers shall work more than three months in this employment category.
Finding Details	Probation period defined in clause no. 1 of the appointment letters signed by workers is 6 months and can be extended by an additional 3 months. This clause does not comply with the legal definition of a "probationer".
Recommendations for Immediate Action	The probation period should not exceed 3 months.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Industrial employment (standing orders) rules 1946- Rule 2(C) of schedule 1: A “probationer” is a workman who is provisionally employed to fill a permanent vacancy in a post and has not completed three months’ service therein.

Benchmark ID	C.9.3
Benchmark Details	Employees shall be compensated for overtime hours at such premium rate as is legally required in the producing country

Finding Details	Correct compensation rates for overtime and rest day work cannot be verified due to unrecorded hours. Management shared that workers do not work beyond 1 hour of overtime during week days and workers do not work on rest days at all. Time records shared with assessors for the sample months reviewed, did not reflect overtime beyond 1 hour on few days in a week and any work done on rest days. From review of leave application form gathered by assessors from HR office for 1 worker from quality department, it was noted that the worker was allowed leave on July 16 & 17, 2026 with comments “Comp off – 23-11-2026 and 30-11-2026”. The year should read 2025 instead of 2026. November 23 and November 30, 2025 were rest days (Sundays) on which the worker had worked and was provided a compensatory off on July 16 & 17, 2026. Assessors requested for leave applications of workers from past months for further review however management stated that the applications / records from past months are stored in a separate location outside the factory at the central record storage office and were not available in the factory. While overtime hours worked up to 1 hour a day is paid, additional overtime hours worked beyond 1 hour a day is adjusted with paid day(s) off calculated at 8 hours for each day off. Rest days worked is also adjusted against full paid day off. The practice of adjusting overtime hours worked with regular days off does not comply with legal requirements. Workers are not compensated accurately as overtime hours worked is required to be compensated at twice (200%) the wage rate as legally required while a regular day wage (100%) is paid for the off days. For rest days worked, per legal requirement, a compensatory rest day in addition to compensation at overtime premium for rest
Recommendations for Immediate Action	The factory needs to pay workers for all hours worked as legally required.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	Factories Act, 1948- Section 59 (1): Where a worker works in a factory for more than nine hours in any day or for more than 48 hours in any week, he shall, in respect of overtime work, be entitled to wages at the rate of twice his ordinary rate of wages. Minimum wages Central Rules 1950- Rule 23(4): An employee shall be granted for rest day wages calculated at the rate applicable to the next preceding day and in case he works on the rest day and has been given a substituted rest day, he shall be paid wages for the rest day on which he worked, at the overtime rate and wages for the substituted rest day at the rate applicable to the next preceding day. The Karnataka Minimum Wages Rules, 1958- Rule 24. Weekly day of rest (4) An employee shall be granted for the rest day wages equal to the average daily wages during the preceding week; and in case he works on the rest day and has been given a substituted rest day, the employee shall be paid, in addition to the wages payable for the rest day on which he has worked, wages for the substituted rest day, equal to the average daily wages during the preceding week:

Employment Relationship (ER)	
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	Presiding officer of Internal Complaints Committee is not designated as legally required.
Recommendations for Immediate Action	Presiding officer of Internal Complaints Committee should be designated as legally required and should be a woman employed at a senior level at workplace from amongst the employees.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Sexual Harassment of women at workplace (prevention, prohibition & redressal) act 2013- Section 4(2)(a): Internal Committee shall consist of the following members to be nominated by the employer namely-a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees.

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	1) The factory does not have written policy and procedures demotion and job reassignment. Written procedures on promotions do not include complete information on steps that are followed for promotions. Procedures do not include the requirement of communication of the procedures to all employees. 2) Performance of sewing machine operators is evaluated however, criteria for evaluation of performance is not communicated to workers. Results of evaluations are not shared and discussed with workers. 3) Factory does not provide a written letter to workers to communicate the promotions. Worker gets to know from information provided on wage slips in the pay period following the pay period when performance was evaluated.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	ER.19.1
Benchmark Details	Employers shall maintain on file all documentation needed to demonstrate compliance with the FLA Workplace Code and required laws.

Finding Details	Based on review of employment documents for 5 sampled outsourced security guards: 1) Appointment letter signed with outsourced security guards is in English and not in local language. 2) Information on wages payable is not included in the appointment letters for 2 out of 5 outsourced security guards (hired in July 2024 and May 2025). 3) Information on benefits is not included in the appointment letters. 4) Appointment letter of outsourced security guards hired in July 2024, and May 2025 are signed by the security guards and not signed by the employer (service provider). Based on review of employment documents for 55 sampled workers: 1) The text size in worker appointment letters is too small to be easily readable. 2). Out of 55 sampled files, 32 service cards do not completely track wage increments from past years. 3) For a few files, the revision of dates for past wages are missing , and management signatures are absent. 4) Signature was missing for 10 appointment letters (no employer and employee signature for 1 worker hired in June 2025; and no employer signature for 6 workers hired in June 2026, 2 workers in March 2026, and 1 in November 2025). Based on review of 10 sampled resigned workers: Review of documentation pertaining to sampled workers who left employment revealed that that date of leaving employment recorded on the calculation sheet for terminal dues for 5 out 10 workers, was earlier than date of resignation recorded on
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	Item 13(1) of Schedule 1 appended to Industrial Employment (Standing Orders) Rules 1946: For terminating employment of a permanent workmen, notice in writing shall be given either by the employer or the workmen - one month’s notice in the case of monthly-rated workmen and two weeks’ notice in the case of other workmen: one month’s or two week’s pay, as the case may be, may be paid in lieu of notice.

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	1) The factory's written procedures on recruitment and hiring are generalized and do not provide information on steps that will be followed during recruitment and hiring procedures. Requirement for assigning responsibilities and training for responsible persons is not included in the procedures. Responsible person designated is HR Manager. 2) The factory does not have written procedures on nondiscrimination. 3) The factory does not have written procedures on forced labor. 4) The factory does not have written procedures governing all aspects of termination and retrenchment. Information on types (causes) for termination of employment, benefits and dues associated with each type of termination, calculations, mode and timelines for payment of dues is not provided.
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. Workers are only informed verbally about opportunities.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required

Local Law

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	Training on Code elements was not provided to relevant supervisors, only 30 out of 71 supervisors received the training. Factory plans to conduct training for remaining supervisors by December 2026.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

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	While the new worker orientation covers basic information such as working hours, wages, legally mandated deductions, leaves, and safety procedures (use of PPEs and fire evacuation), elements such as Child Labor, Forced Labor, Grievance Procedures, Freedom of Association, Termination and Retrenchment, Workplace conduct and Discipline and Environmental aspects are not included in the training.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

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	1) The factory does not have written policies and procedures on performance reviews that include steps and processes, linkages to job grading, nondiscrimination, written feedback, and compliance with legal requirement. However, factory has a system for promoting workers. 2) Performance evaluation is not conducted for all workers and is conducted for sewing machine operators only. Per factory's practice, supervisors recommend sewing machine operators for evaluation of their performance. Evaluations are conducted by the Industrial Engineering department and results are shared with supervisors and production managers. Based on the results, production managers recommend sewing machine operators for promotions and the list is shared with HR team who implement the recommendations with change in designations and increments.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

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	1) The grievance committee chairman is not designated and rotated as legally required. 2) Workers' signatures acknowledging satisfactory grievance resolution are not documented. 3) There are only 3 worker representatives (1 male, 2 female) on the grievance committee representing 1,639 workers (161 male, 1,478 female).

Recommendations for Immediate Action	1) Chairman of grievance committee should be designated and rotated as legally required. 2) Signature of workers who report grievances should be documented to acknowledge satisfactory resolution. 3) Factory must ensure adequate representation from workers in the grievance committee.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	a. Industrial Disputes Act 1947- Section 9C (3) : Setting up of Grievance Redressal Machinery- The chairperson of the Grievance Redressal Committee shall be selected from the employer and from among the workmen alternatively on rotation basis every year. b. Industrial Disputes Act 1947- Section 9C (2) : Setting up of Grievance Redressal Machinery- The Grievance Redressal Committee shall consist of equal number of members from the employer and the workmen.

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	The factory only provided training on Code elements to 270 instead of all workers (1,639). The factory plans to provide training to the remaining workers by December 2026.
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	Workers are not 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.).

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
Benchmark Details	All production machinery, equipment and tools shall be properly guarded and regularly maintained.
Finding Details	1) The factory uses 2 cargo lifts with capacities 1000 kg and 750 kgs. Inspection report provided by external inspector on 19 January 2026 does not specify the name and type of lift inspected. Hence it cannot be verified if the lift was inspected. 2) The factory has not implemented a complete lockout-tagout maintenance safety system for all relevant equipment. 3) Traffic lane is marked on only one walkway from factory entrance at main gate along one side of production building leading to the rear end of the building and is not marked on walkways in front of other buildings. The traffic lane marked, is faded and are not prominently visible. Walkways are not marked at all. Convex mirrors are not installed at blind turns except for one mirror installed at blind turn at rear end of production building. 4) Ladders are not provided for use by maintenance workers. Management stated that ladders provided earlier were damaged and are yet to be replaced. Currently platform ladders used in fabric storage area are used. These platform ladders have wheels with locking arrangement. However, when tested, the wheel locking arrangement was not functional, and ladder could be moved easily post locking the wheels. This could be a risk of injuries from accidental fall.
Recommendations for Immediate Action	1) Ensure complete and accurate information is recorded on inspection reports for lifts. 2) Implement a lockout- tagout maintenance safety system. 3) Mark the traffic lanes inside the factory to ensure safety to human traffic and install convex mirrors at all blind turns. 4) Provide appropriate ladders with safety arrangements for use by maintenance workers.
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. 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. d).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.18.1
Benchmark Details	Medical facilities shall be established and maintained in factories as required by applicable laws.
Finding Details	1) Medical facility provided in the factory does not comply with legal requirements. Full-time medical practitioner and equipment are not provided as legally required. 2) Ambulance driver is not specifically designated. Available drivers in the factory are used in case of need. This could be a risk in an emergency situation.
Recommendations for Immediate Action	1) Comply with legal requirements for medical facility. 2) Ensure a driver is specifically assigned for ambulance.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	a). Karnataka Factories Rules 1969 - Chapter V- Welfare - 92. (1) Every ambulance room shall be under the charge of at least one whole-time qualified medical practitioner (hereinafter referred to as Medical Officer) assisted by at least one qualified nurse or dresser-cum-compounder and one nursing attendant in each shift: (4) The ambulance room shall be separate from the rest of the factory and shall be used only for the purpose of first-aid treatment and rest. An adequate supply of wholesome drinking water shall be laid on and the room shall contain at least as listed items (i) to (xliii). b). Karnataka Factories Rules 1969 - Chapter V- Welfare - 92.(5) The occupier of every factory to which these rules apply shall for the purpose of removing serious cases of accident or sickness, provide in the premises and maintain in good condition an Ambulance Van.
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	1) Childcare workers employed are not qualified and trained as per legally provide guidelines. Workers employed possess senior school certificates. 2) Clean clothes are not provided to childcare workers as legally required. 3) Assembly area is designated at the entrance to factory building and is inadequate with an ambulance parked. Other available area is the driveway which has cars parked and the area cannot accommodate 100% of employees in case of an evacuation. Pictures filed with logs of evacuation drills conducted between May 2025 and May 2026 indicate that some workers were inside the factory building due to lack of space outside the building and the entire driveway was used and was congested with no space available for movement. Assembly of workers outside the factory building was not organized in a defined manner. Adequate space is not available between factory building and assembly areas to ensure safe distance is maintained. 4) Evacuation directions and aisle markings on the floors are faded in all work areas. There is no system in place for period review and maintenance to ensure that markings are visible at all times.

Recommendations for Immediate Action	1) Employ qualified childcare workers. 2) Provide clean clothes to childcare workers as legally required. 3) Provide adequate space in assembly areas to accommodate workers. 4) Mark and maintain evacuation directions and aisle marking on the floors in all work areas.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	a. Karnataka Factories Rules, 1969. Chapter V- Welfare- 104. Creche Staff- (2) Except as in sub-section (2) of Section 48, no woman shall be appointed under sub-rule (1) as a woman-in-charge unless she possesses a Nurse's qualifications or produces a certificate that she has undergone training for a period of not less than 18 months in childcare in a hospital, maternity home, or nursing home approved in this behalf by the Chief Inspector. b. Karnataka Factories Rules, 1969. Chapter V- Welfare- 104. Creche Staff-(4) The creche staff shall be provided with suitable clean clothes for use while on duty in the creche. c. 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.
Recommendations for Immediate Action	Provide safety information to contractors.
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	1) The factory does not monitor safety requirements to ensure safety to persons entering confined spaces and work permits are not used at all. 2) Safety helmets, safety ropes, safety shoes are not provided for maintenance persons. 3) Maintenance tools (drill machines, electric testers, pliers, hammers, etc.) used by maintenance persons are not inspected periodically to ensure safe usage.
Recommendations for Immediate Action	1) Monitor safety requirements to ensure safety to persons entering confined spaces and ensure to use work permits. 2) Provide safety helmets, safety ropes, safety shoes should be provided for maintenance persons. 3) Ensure all maintenance tools (drill machines, electric testers, pliers, hammers etc.) used by maintenance persons are inspected periodically to ensure safe usage.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	a).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. 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.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	1) The factory does not have written procedures regarding environmental protection. 2) The factory does not have written procedures on health and safety. 3) The factory does not have written procedures including environmental emergencies, wastewater, air emissions, solid and hazardous waste. 4) The factory does not have written procedures for emergency/evacuation, fire safety, first aid, machine guards, PPE, etc. However, there are systems in place.
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	The factory has conducted a risk assessment on 6th of May 2026. However, it lacks risk frequency evaluation, data on number of persons potentially impacted, and detailed information on administrative controls to reduce risk.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	HSE.30.2.5
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: procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) and environmental emergencies

Finding Details	The factory maintains records for illness and legally required records for accidents and injuries. However, the factory does not have written procedures for reporting death, injury, illness and other health and safety incidents and environmental emergencies.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	HSE.5.1.2
Benchmark Details	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;
Finding Details	The smoke detector installed in the kitchen, near the gas usage areas and cooking area, were found to be non-functional.
Recommendations for Immediate Action	Ensure all smoke detectors installed in the kitchen are fully operational and maintained in accordance with fire safety regulations.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	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.

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	Workers in checking stations at the end of sewing lines located on 1st floor, were standing on evacuation passages and working restricting free movement and access towards exits. Few workstations in sewing lines on first floor, were seen placed on evacuation passages. Passage is not provided for movement of workers working on sewing machines located towards rear side of training room on first floor. Work stations on sewing floors are placed adjacent to each other and sewing machine operators face each other with passages towards their backs. In case of an evacuation, workers push back their chairs which could restrict free movement of workers along the passages and could be a risk for accidents and injuries.
Recommendations for Immediate Action	Ensure that evacuation routes, passages and walkways are available and 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.

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	Conduct an assessment after the drill to learn how to improve the evacuation process
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.9.1

Benchmark Details	All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws and international standards.
Finding Details	1) Apart from paints, waste material like cooking utensils, damaged chairs, printers, cardboard boxes etc. are stored with chemicals in the chemical storage room. One extinguisher is provided near the room which may not be adequate in case of a fire. 2) Waste storage area located towards rear side of the factory is disorganized. All types of waste are stored together and in access quantities which could be a risk to environment and workers. Hazardous electrical waste is stored compressors that were operational.
Recommendations for Immediate Action	1) Ensure chemical storage area is segregated and maintained. 2) Ensure waste material is stored in an organized manner.
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	Two common-use glasses are provided at drinking water station. While workers frequently use their own bottles, the availability of shared glassware presents a cross-contamination risk.
Recommendations for Immediate Action	Factory should ensure hygienic drinking water arrangement is provided.
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.

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	1) Anti- fatigue mats are not provided to approximately 40% of workers with standing jobs in checking and packing sections. 2) Sitting areas are not provided for workers with standing jobs. 3) Workstations are not adjustable in height.
Recommendations for Immediate Action	1) Provide anti- fatigue mats to all workers with standing jobs in checking and packing sections. 2) Provide sitting areas for workers with standing jobs. 3) Ensure workstations are adjustable in height.
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 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. 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.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	1) Food handlers are not provided with hand gloves. Nose mask provided was not being used effectively and were pulled down under the chin. Additionally, closed shoes and water-resistant aprons are not provided to cooks in the kitchen to prevent from burn injuries due to accidental spill of hit oil or water when cooking. 2) Fly catchers are not installed in kitchen and dining areas. 3) Cooked food is not kept covered near the service counter.
Recommendations for Immediate Action	1) Food handlers should be provided with hand gloves. Nose mask provided should be effectively used. Closed shoes and water-resistant aprons should be provided to cooks in the kitchen to prevent from burn injuries due to accidental spill of hit oil or water when cooking. 2) Fly catchers should be installed in kitchen and dining areas. 3) Cooked food should be kept covered.

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 substance.

Benchmark ID	HSE.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
Finding Details	1) Eye shields on 98% of overlock lock machines are pushed upwards and not used by machine operators. 2) Sanitary pads are kept with nurse and not made available in female toilets as legally required. Workers need to walk down from the work stations and request for pads. 3) Load capacity is not marked on fabric, trims and finished goods storage racks. 4) Training is not provided to all health and safety committee members.
Recommendations for Immediate Action	1) Eye shields on overlock lock machines should be maintained in place. 2) Sanitary pads should be made available in female toilets as legally required. 3) Load capacity should be marked on fabric, trims and finished goods storage racks. 4) Training should be provided to all health and safety committee members.
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).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.

Benchmark ID	HSE.10.1

Benchmark Details	Material Safety Data Sheets (MSDS) for all chemicals and hazardous substances used in the workplace must be available at the usage and storage sites of the chemicals and hazardous substances, in the local language and the language spoken by workers, if different from the local language.
Finding Details	MSDS or SDS for paints stored in the factory is available, however it was not displayed
Recommendations for Immediate Action	Display MSDS or SDS for paints stored in the factory.
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.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	1) Building stability certificate dated 1-6-2024 issued by external inspector covers production building only (building 1) and not all buildings included in approved factory plan 2) Inspection report no. C.No. 76/FSR/RFO/DR/2026 dated 9 July 2026 from Regional fire officer of the region had recommended (a) Installation of 1 Fire Hose Reel near staircase of extended mezzanine floor current housing unused sewing machines (b) Provision of Wet Riser system near the staircase of extended portion of mezzanine floor (c) Provision of Automatic detection and fire alarm system in the extended portion of mezzanine floor (d) connecting smoke and fire detectors in extended mezzanine floor with alternative source of power and (e) providing transparent fire retardant coating on electrical cables on termination points in the electrical panels and distribution Factory has not implemented and complied with the recommendations. 3) Internal inspection report for steam generator was last conducted on 6 March 2024 and was due inspection after 2 years i.e March 2026 however the inspection was not conducted. Inspection report of pressure vessels for 3 air compressors, 3 air receivers and 2 air dryers conducted by 3rd party external inspector reflects that internal examinations (hydrostatic test and ultrasonic test) were conducted on 19 January 2026 and are valid until 18 July 2026 (6 months). Legally internal examinations (Hydrostatic test and Ultrasonic tests) are valid for 2 and 4 years while external examination reports are valid for 6 months. From the reports, nature of test conducted could not be verified, as the validity period recorded indicates an external examination of the pressure vessels while description of examination conducted indicates internal examination
Recommendations for Immediate Action	1) Ensure all buildings are inspected and building stability certificate are obtained for all buildings. 2) Ensure the recommendations for fire officer are implemented. 3) Ensure all pressure vessels are examined within legally defined timelines and reports with accurate information are maintained.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required

Local Law	a). Karnataka Factories Rules, 1969. -3.- Approval of site, construction or extension of a factory (8) After the date of commencement of the Karnataka Factories (Amendment) Rules, 1993, no manufacturing process shall be carried on in any factory constructed, extended or taken into use as a factory or part of a factory unless a certificate of stability in Form No. 1-A in respect of the building is issued by a person possessing a degree in Structural or Civil Engineering. 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). Karnataka Factories Rules, 1969. - Chapter IV - safety - [65. Pressure vessels or plant: -7(a) Every pressure vessel or plant in service shall be thoroughly examined by a competent person:(i) externally, once in every period of six months; (ii) internally, once in every period of twelve months: Provided that, 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 period of two years: Provided further that in case of a pressure vessel or plant which is in continuous process and cannot be frequently opened the period of internal examination may be extended to four years; (iii) hydrostatically tested once in every period of four 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	Hand gloves provided to electricians were damaged and were not being used.
Recommendations for Immediate Action	Ensure all hand gloves provided to electricians are inspected periodically and replaced when damaged.
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	1) Fire Fighting team does not have the appropriate equipment to fight fires (correct PPE, breathing apparatus). 2) The factory does not have sufficient and adequate firefighting equipment (fire extinguishers, hoses, sprinkler system in waste material storage area. Large quantity of paper waste, wooden waste, metal waste are all stored together in a haphazard manner towards rear side of the factory. 3) Contact information for medical response is displayed at security cabin near main gate and in the HR department office and is not displayed throughout the factory.
Recommendations for Immediate Action	1) Provide fire fighting team with appropriate equipment to fight fire, such as proper PPE and breathing apparatus. 2) Provide adequate firefighting arrangements in the waste material storage areas. 3) Display contact information for medical response 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. 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.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	1) Hand drying facility is not provided in toilets 2) Kitchen floors and walls are not maintained clean 3) The factory does not keep food samples for the necessary length of time to prevent food born illness.

Recommendations for Immediate Action	1) Provide hand drying facility in toilets 2) Ensure kitchen floors and walls are maintained clean. 3) Keep food samples for the necessary length of time to prevent food born illness.
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.20
Benchmark Details	Employers shall establish the number of toilets required under applicable laws within reasonable distance of the workplace. In addition, the following should also be considered: number of toilets based on number of workers, privacy for each individual and gender, accessibility and hygiene.
Finding Details	The factory only provides 53 toilets for use by 1,478 female workers, instead of 60 toilets as required by law.
Recommendations for Immediate Action	Ensure adequate number of toilets are available for workers.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Karnataka Factories Rules 1969- Chapter III - Health- 44. Latrine Accommodation (1) Latrine accommodation shall be provided in every factory on the following scale: — (a). where women are employed, there shall be at least one latrine for every 25 women.

Benchmark ID	HSE.8
Benchmark Details	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.

Finding Details	1) PPE training was only provided to 1,490 workers, instead of all workers (1,639). 2) Except for 1 machine maintenance person, safety shoes are not provided to maintenance workers including electricians and maintenance head. 3) Safety helmets are not provided to maintenance workers. 4) Band knife cutting machine operator was using mesh gloves on one hand instead of using on both hands. 5) Overlock machine operators are not provided with nose masks to prevent machine operators from breathing in floating fabric dust.
Recommendations for Immediate Action	1) Provide training in PPE to all workers. 2) Provide safety shoes to maintenance workers including electricians and maintenance head. 3) Provide safety helmets to maintenance workers. 4) Ensure that band knife cutting machine operator uses mesh gloves on both hands. 5) Provide overlock machine operators with nose masks to prevent from breathing in floating fabric dust.
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.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	Management has not conducted any assessments for determining thermal comfort problem areas.
Recommendations for Immediate Action	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	Chemical handling training was provided to only to 40 out 65 workers working with chemicals.
Recommendations for Immediate Action	Ensure all workers handling chemicals are trained.
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	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	The factory does not conduct training for workers working in canteen on specific health and safety/hygiene training.
Recommendations for Immediate Action	Conduct training for workers working in canteen on 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 substance.

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	The factory does not provide training to workers operating machinery. Only basic operational awareness is provided.
Recommendations for Immediate Action	Provide training to workers operating machinery.
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 workers with specific, additional firefighting, emergency and first aid responsibilities.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Benchmark ID	HSE.27.3
Benchmark Details	Children must not visit parents in workplace areas.
Finding Details	The factory does not provide specific health, safety, and hygiene training for childcare workers.
Recommendations for Immediate Action	Provide specific health, safety, and hygiene training for childcare workers.
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.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 during assessment period revealed that few pictures were similar from last drills conducted in May 2025, September 2025 and May 2026. Specifically, similarity was noted from drills conducted in May 2025, July 2025, November 2025 and January 2026. Management confirmed that the factory's safety officer left employment in September 2025 and evacuation drills were not conducted since September 2025. However, logs are maintained to comply with legal requirements.
Recommendations for Immediate Action	Ensure evacuation drills are conducted within legally defines timelines and accurate and complete information is maintained.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Karnataka Factories Rules, 1969 - Chapter IV- Safety - 71. Fire protection: -12 (c) 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	Safety instructions should be displayed or posted near machinery.
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.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 appropriate system to respond to any unexpected environmental emergency such as chemical spills or gas leak.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

Hours Of Work (HOW)

Benchmark ID	HOW.1.1
Benchmark Details	Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.
Finding Details	A review of time records for five sampled security guards revealed that at least three guards worked double shifts (16 hours) continuously on multiple occasions over the past three months.
Recommendations for Immediate Action	The factory should ensure that security guards do not work continuously.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 54 : Daily hours. Subject to the provisions of section 51, no adult worker shall be required or allowed to work in a factory for more than nine hours in any day.

Benchmark ID	HOW.21
Benchmark Details	Other than in exceptional circumstances, the total weekly work hours (regular work hours plus overtime including any alternative shifts such as 4x4 or 3x3) shall not exceed 60 hours per week.

Finding Details	Management stated that workers do not work overtime more than one hour per day, and official timecards showed a maximum of 54 hours in a week. However, leave records confirmed that workers worked extra time and on the rest days based on production needs. Instead of paying correct overtime wages, management compensates workers with informal days off. Because management does not record these extra hours in the timecards and payroll, the actual weekly working hours could not be verified.
Recommendations for Immediate Action	The factory must share complete information on working hours and ensure workers do not work beyond 60 hours a week.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 64 (4)(iii): In making rules under this section, the State Government shall not exceed, except in respect of exemption under clause (a) of sub-section (2), the following limits of work inclusive of overtime - the total number of hours of work in a week, including overtime, shall not exceed sixty.

Benchmark ID	HOW.22.2
Benchmark Details	Accurate time records shall be maintained by employers, including overtime, breaks, and leave.
Finding Details	Management stated that workers do not work on rest days at all. Time records shared with assessors for the sample months reviewed, did not show any work done on the rest days. However, a review of leave record showed that time records maintained by the factory are not authentic and accurate. Official timecards did not match internal tracking, as a leave record from the quality department showed a worker was given paid leave on July 16 and 17, 2026 to compensate for unrecorded work done on November 23 and 30, 2025 (rest days). Because these hours were not included in the timecards and payroll, actual working hours were unable to verify. Notes: Assessors requested for leave applications of workers from past months for further review, however, management stated that the records are stored in a separate location outside the factory (at the central record storage office) and were not available in the factory.
Recommendations for Immediate Action	The factory must ensure that records are maintained with complete and accurate information on working hours.
Recommendations for Sustainable Improvement	

Compliance Classifications	Immediate Action Required
Local Law	THE PAYMENT OF WAGES ACT, 19361 - 13A. Maintenance of registers and records. — (1) Every employer shall maintain such registers and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed.

Benchmark ID	HOW.22.4
Benchmark Details	Employers shall not maintain multiple time-keeping systems and/or records.
Finding Details	A reviewed of leave record showed that the factory does not maintain a single timekeeping system, as official timecards do not match internal tracking records for rest days and overtime hours. Due this practice, actual working hours are unable to verify.
Recommendations for Immediate Action	The factory must maintain a single system for timekeeping.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	THE PAYMENT OF WAGES ACT, 19361 - 13A. Maintenance of registers and records. — (1) Every employer shall maintain such registers and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed.

Benchmark ID	HOW.22.5
Benchmark Details	Time records maintained shall be authentic and accurate.
Finding Details	A review of leave record showed that time records maintained by the factory are not authentic and accurate. Official timecards did not match internal tracking, as a leave record from the quality department showed a worker was given paid leave on July 16 and 17, 2026 to compensate for unrecorded work done on November 23 and 30, 2025 (rest days). Because these hours were not included in the timecards and payroll, actual working hours were unable to verify.
Recommendations for Immediate Action	The factory must ensure that information on time records is complete and accurate.
Recommendations for Sustainable Improvement	

Compliance Classifications	Immediate Action Required
Local Law	THE PAYMENT OF WAGES ACT, 19361 - 13A. Maintenance of registers and records. — (1) Every employer shall maintain such registers and records giving such particulars of persons employed by him, the work performed by them, the wages paid to them, the deductions made from their wages, the receipts given by them and such other particulars and in such form as may be prescribed.

Benchmark ID	HOW.3
Benchmark Details	Employers shall provide reasonable meal and rest breaks, which, at a minimum, must comply with national laws.
Finding Details	Based on production requirements, when overtime is needed, workers work until 6.30 PM after their lunch break ends at 1:00 PM. This results in workers working 5.5 hours continuously (including overtime) without a break.
Recommendations for Immediate Action	The factory must ensure the legally defined breaks are provided to workers, especially when overtime is required.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 55: The periods of work of adult workers in a factory each day shall be so fixed that no period shall exceed five hours and that no worker shall work for more than five hours before he has had an interval for rest of at least half an hour.

Benchmark ID	HOW.2
Benchmark Details	Workers shall be entitled to at least 24 consecutive hours of rest in every seven- day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following.

Finding Details	Management stated that workers do not work on rest days at all. Time records shared with assessors for the sample months reviewed, did not show any work done on rest days. However, a review of leave record showed a worker was given paid leave on July 16 and 17, 2026 to compensate for unrecorded work done on November 23 and 30, 2025 (rest days). Because these hours were not included in the timecards and payroll, it could not be verified whether all workers received a day off in seven-day period. Notes: Assessors requested for leave applications of workers from past months for further review, however, management stated that the records are stored in a separate location outside the factory (at the central record storage office) and were not available in the factory.
Recommendations for Immediate Action	The factory must ensure that workers are provided a day off in every seven-day period.
Recommendations for Sustainable Improvement	
Compliance Classifications	Immediate Action Required
Local Law	Factories Act 1948- Section 52 (1) (a): No adult worker shall be required or allowed to work in a factory on the first day of the week (hereinafter referred to as the said day), unless he has or will have a holiday for a whole day on one of the three days immediately before or after the said day.

Benchmark ID	HOW.9.2
Benchmark Details	Employers shall take reasonable steps to inform workers about the nature and expected duration of the circumstances sufficiently in advance to allow workers to make alternative plans.
Finding Details	Overtime requests are communicated to workers an hour prior to end of regular shift instead of the beginning of their working shift.
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	

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 and collective bargaining
Recommendations for Immediate Action	
Recommendations for Sustainable Improvement	
Compliance Classifications	Sustainable improvement required
Local Law	