

CORRECTIVE ACTION PLAN - REAL GARMENTS LTD									
Facility Address	Lot F11/12, SLDG Industrial Park, La Tour Koenig, Pointe aux Sables, Republic of Mauritius								
Assessment Agency	Verite Inc. (USA) and ASK (India)								
Assessment Type	Foreign Contract Worker Assessment								
Assessment Dates	June 14-15, 2023								
CAP Prepared by	Brand Group (PVH, Diesel, Rodd & Gunn, Barbour, Second Clothing)								

1. FOREIGN CONTRACT WORKER PROTECTION / FORCED LABOUR PREVENTION

Section	Finding No.	DESCRIPTION OF FINDING (VERITE REPORT)	EVIDENCE OBSERVED (Verite Report)	ROOT CAUSE IDENTIFIED BY REAL GARMENTS	Brand Recommendations based on Verite's Recommendations	DETAILS OF ACTION TAKEN (AND TO BE TAKEN) BY REAL Garments	Responsible Dept./Person at REAL Garments	Completion date (proposed by REAL)
1A - Forced Labour and Human Trafficking Policy	1	Management does not provide workers with the original copies of their work or resident permits issued by the Mauritius Government.	Management keep these documents in the foreign contract workers' personal files. Management explained that this is due to the "safety of the workers" as "these can be lost or damaged/poorly maintained" if the original document is given to the workers. Retention of the work and resident permit original documents curtails FCW's freedom of movement outside the factory campus and curtails their freedom of employment as well.	Management had the belief is that these documents should be kept safely in employees' personal files with the sole aim to avoid damage or loss which would entail a financial expense in case a new one is requested to the Government. Past experience has demonstrated that these documents when lost or damaged take too much time to be re-issued by the authority. But these files were kept at the Welfare Officers' office where workers had easy access to and can ask anytime they wish to.	1.1 Provide all workers with original work / resident permits without delay. 1.2 Where original documents are required for legal processing by REAL, provide workers with their original copies of documents along with: - clear communication on process & timeline for processing - signing a standardized form to track documents' submission and safe return (management may keep copies for their own record of documentation) 1.3 Provide individual safe, damage-proof and lockable storage for all workers during employment for which they have exclusive (24/7) access to store documents & other valuables.	1.1 Original Work / residence permits are being provided to all workers. Workers will also be requested to sign an acknowledgement sheet confirming receipt of original documents. Workers will be informed that they can have a copy of their permits in case the original document is lost or damaged as factory will keep a copy in their personal file. 1.1.1: However, while providing these documents, we will inform workers of the consequences of losing original documents. Therefore, we will sensitize workers to upkeep these documents properly and safely. 1.2 Normally RGL will not request the original documents again for legal processing. But the worker might need the documents for bank processing where the worker himself will need to attend the concerned office personally and thereby bringing along the original Work and Residence permits. 1.3 All workers are already provided with 2 lockers with keys and padlocks to keep their valuable belongings in the dormitories. In addition to that, new lockers with padlocks of dimension 90X180 cm is being allocated to them within factory premise for keeping of documents or any other belongings. They will easily have access to the lockers 24/7. Factory management will ensure that lockers provide enough privacy and safety and are well maintained by conducting regular checks and/or speaking with workers to ensure they are confident and that they will keep their property safe.	HRM / Ferane	30-Jul-23
	2	Management also does not provide workers with a copy of the Employment Contract Letter.	During the onsite and offsite worker interviews, all 153 workers interviewed (including 13 local workers) confirmed that they do not have a copy of their Employment Contract Appointment letter.	Original Employment Contracts were being provided to workers at the Onboarding stage only. During the contract renewal process, workers who want to have a copy for their reading was referring to the template contract version which is affixed on notice boards in own language.	2.1 Provide all workers with original copy of their Employment Contract Letter. 2.2 Revise procedures on the provision of contracts to ensure that all workers are provided a subsequent copy of their original signed contract for reference, both during the initial hiring process & job vacancy discussion, and in the event that a renewal or amendment contract or addendum is issued. All contracts should be provided in a language workers can understand.	2.1 Original Employment Contracts in own worker native language (that is Bengali, Hindi, Malagasy and Creole) that worker understands are being provided to all current workers and expected date to complete is end of August 2023. Workers will also be requested to sign an acknowledgement sheet confirming receipt of original contracts and workers will be informed that they can have a copy of their Employment Contract letters in case the original document is lost or damaged as factory will keep a copy in their personal file. 2.2 SMS-RE-001 - Recruitment Policy for Expatriate Workers is amended to include the obligation to provide potential and newly hired workers with a copy of Employment Contract. New clause added in the policy is highlighted red below and will be applicable in the next recruitment exercise. * A copy of the Employment Contract letter will be handed to regional offices, employment offices and/or Sub-Agent Offices (if any) with the aim of giving workers a good perspective of employment conditions while advertising job position for R.E.A.L Garments Ltd in source country. * Prior to start of worker interviews with a specific batch of potential candidates, a template of the Employment Contract in own worker language is provided to all potential new recruits. * Worker will be given ample time to review employment contracts or to query on any condition that they are not understanding properly. * Two originals Employment Contracts are signed by the worker after successful interview and understanding of employment conditions. * The First part of the Two originals Employment Contracts is signed in source country and the Second part of the same Two originals Employment Contracts is signed in Mauritius upon arrival. * After signature of the First part, one original copy is given to the worker in home country. The other original copy is brought along with the HR team to Mauritius for work permit and residence permit formalities. * The worker should bring along with him/her the original copy at her disposal while traveling to Mauritius for Second part signature. * Once the Original Employment Contract is signed on the Second part in Mauritius, the original copy of the document remains with worker.	HRM / Ferane	2.1 30/08/2023 2.2 Completed
	3	Workers do not receive copies of company policies, nor do they receive training on the same.	No training is conducted for the workers on the Forced Labor and Human Trafficking Policy. Copies of these policy documents are also not provided to any worker, although signatories in their personnel files state that they have received the relevant policies.	The training frequency on policy awareness is scheduled on a yearly basis and this has not been effective for workers to remember on their rights for a decent work and a decent treatment. It may happen that workers have forgotten on the key policies explained to them last year in September 2022.	3.1 Provide all workers with copies of company policies in workers' languages without delay. 3.2 Conduct training in workers' language to cover terms and conditions of employment, company policies, the working rules, grievance procedures, discipline policies, and workers' rights to freedom of association, among other relevant topics. 3.3 Conduct refresher training, posting in workers' languages, worker handbook written in workers' languages. 3.4 Conduct periodic review of workers' knowledge of policies through questionnaires or interviews of a sample of workers.	3.1 RGL takes the commitment to provide signed company policies which are in own workers' language to all workers. Workers will also be requested to sign an acknowledgement sheet confirming receipt of original documents. The acknowledgement shall be in the language the worker understand. Workers will be informed that they can have a copy of the policies in case the one at their disposal is lost or damaged as factory will keep a copy in their personal file. 3.2 Worker awareness trainings on employment conditions and policies surrounding the hiring, employment and workers council was done in Sept 2022 and the policies found in personal files were signed last year after training together with an attendance sheet. In addition, these policies are posted on Notice Boards in all sections and dormitories in own worker language. 3.3 In addition to that, RGL shall reinforce the awareness training by changing a yearly refresher to a 6 month refresher training. Next refresher training is scheduled on Sept 2023. Employee handbook will be created and shared with all workers. 3.4 Questionnaire template will be devised for periodic review and assessment on understanding of policies will be done prior to refresher course. Further actions / improvements will be taken if it happens that we found additional route cause to effective communication on policies awareness.	HRM / Ferane	3.1 End July 3.2 Completed 3.3 Sept 2023 3.4 Sept 2023
1B - Prevention of Fees and Debt Bondage	4	Bangladeshi workers pay local transport costs incurred during the recruitment process.	Although no recruitment fees are now charged by the Bangladeshi recruitment agency, it was found in interviews with Bangladeshi FCWs that they still incur expenses ranging from BDT 50 to 3,000 for traveling from their native towns to the recruitment agent's office in Dhaka. In REAL's contract with the recruitment agency, there is a provision for USD 50 (as part of the overall contract value) for reimbursement of all local transport costs within the source country incurred by the workers during their recruitment process.	Although RGL policies details that our commitment to pay all recruitment cost, our awareness meeting with potential workers was not effective enough to pass on the message that RGL pays all cost even the minor transportation fees. In addition to that our verification process prior to hiring batch of 2020 have not detected the internal transport cost incurred to and fro agent's office.	4.1 REAL are to reimburse all Bangladeshi workers with for the local travel free as soon as possible.	4.1 RGL undertakes the commitment to refund all workers the maximum amount of BDT 3,000 in the salary payment on 31st August 2023. (P.S. July salary computation is already closed). As soon as payment is effected, RGL shall send proof of payment (workers' pay slips) and transportation refund acknowledgement receipt signed by workers in their own language to our buyers by 2nd September 2023. While we brought changes in our auditing systems start of 2022 to meticulously capture all costs prior to departure, we discovered during our audits that batch of 15, 16, 18 and 19 October 2022 comprising of 28 workers did not received transport fare from their house to airport prior to departure to RGL Mauritius. The agent was instructed to pay all 28 workers and the remaining 96 workers for the October 2022 batch and to avoid the practice of allowing workers to pay so that later they engage in a refund process. Proof of payments were asked by RGL to Agent to close this Non compliance found in labour agent audit.	HRM / Ferane	4.1 End August

	5	Factory management does not have an adequate process to verify fees paid by workers.	Factory management does not have a written or documented mechanism in place by which they verify whether or not a worker paid any kind of recruitment fees or cost during the course of recruitment. Instead, they have an informal and verbal mechanism for obtaining feedback from the FCWs about this topic.	Although we had a No Recruitment Fee policy which is signed by the Agent on 30-Mar-22, that part of verification of fees was the missing mechanism to ensure full control of labour supplier. When labour contractor was audited in October 2022, and the discrepancies were seen in transport refund, we have then derived a Labour monitoring mechanism which is fully documented on Dec 2022. The policy has again been improved/revised on July 2023	5.1 Develop a policy and standard tool or formula to proactively verify fees paid by newly hired workers upon their arrival and to enable prompt reimbursement for any fees workers paid as soon as possible but no later than 30 days. 5.2 Draft and implement a fee verification checklist for all new batches of foreign worker are hired and: • communicate new policy & procedures to relevant staff assigned as well as to all migrant workers who need to be aware of "employer pays all" policy and that all fees are reimbursed. • Communicate and follow up with the labour agent to ensure a full refund of internal transportation costs incurred by the workers during the recruitment process before leaving for the job from their country of origin, requiring agent to supply REAL management grievance email.	5.1 Policy with reference SMS-RE-037 (Labour Supplier Monitoring Policy and Procedure) has already been developed by RGL in December 2022. Verification of the fees incurred in the recruitment process is performed at 03 levels (Awareness and Training in Home Country and Recruitment Fee Verification before pre-departure, Worker Survey and Feedback in R.E.A.L. Garments Ltd and Labour Supplier's Management Systems Auditing). The verification of fees paid will be conducted with all workers prior to departure (post pre-departure training) and will be filled in by workers native language and will be filled in during individual meeting with the worker. 5.2 Recruitment fee verification checklist is already included in the Labour Supplier Monitoring Policy and Procedure. SMS-RE-037. Verification of fees will be conducted in the next recruitment batch planned for end September 2023. 5.3 The LSA with Labour contractor has already a clause to reimburse recruitment fees of any amount to worker before leaving home country and to upkeep reimbursement receipts. However, part of the addendum of the LSA contract will be the obligation of the labour contractor to refund any declared fee to the worker prior to its departure from source country. Contrary to that if any unrefunded fees are found during RGL surveys individually with the worker in Mauritius-RGL shall refund the unrefunded amount within 30 days. If there is any discrepancy this will be captured while conducting the Supplier Monitoring.	HRM / Ferane Completed
1C - Labour Agent Management	6	No documented due diligence exercise was carried out before entering a business relationship with the new Labor Service Provider Agency in Bangladesh, T.M. Overseas.	The Assessment Team did not find any documented or verifiable due diligence carried out by REAL before freezing the relationship with the Bangladesh-based recruitment agency. Both REAL Management and the Head of the Recruitment Agency shared that due diligence was done but in an undocumented and informal manner.	Prior to selecting the agency, we consulted the Ministry of Labour views and opinions on the Labour agent having good reputation and as well as having a registered office in Mauritius and in source country. The agency was also chosen because they have a good track record in providing services to the leaders textile manufacturers in Mauritius and having already a code of conduct that matches our principles. However, this exercise was done informally in Mauritius due to the absence of a written and documented policy on Labour Agent appointment and pre-screening.	6.1 Develop and implement policies and procedures on conducting due diligence before engaging with any new labor agencies. Include pre-screening steps to determine a new recruitment partners' ability to meet supplier, customer and legal standards, such as "employer pays principle". 6.2 Work with existing local agencies to map & record any sub-agents or labor brokers used in the recruitment of migrant workers.	6.1 New Policy and procedures will be drafted for Labour Agent appointment including clear criteria and pre-screening conditions. Policy implementation will be done at the term of the current LSA contract in Bangladesh expiring in 31 Dec 2023. The new policy will be implemented in the event RGL embarked in a new sourcing country. 6.2.1 After discussing with the local agent in Mauritius, it has been confirmed that there are 3 main offices comprising of 14 TM Overseas staffs and 5 sub-agents informally in the recruitment chain. 6.2.2 RGL confirms that an onsite mapping will be performed in Bangladesh in order to have full transparency on factors involved in the recruitment chain. A dedicated team consisting of persons with key knowledge and competencies in supply chain management, ethical practices and migrant labour will be assigned clear roles and responsibilities to conduct this task. RGL shall share the mapping results to its brand and discuss the outcome. The next due diligence and on site mapping shall be documented and improvements reports which requires an action plan will be drawn and asked from labour agents. 6.2.3 RGL also affirm that all policies and expectations related hiring of workers, employer pays principles, pre-departure training, employment contracts, ethical policies related to migrant labour will be communicated to the entire chain of agents and sub-agents down to village level. The communication will include trainings on hiring, ethical, social and migrant labour policies in the native language of the agents and sub-agents with translated copies of policies and contracts handed to all agents and sub-agents.	6.1 End of August HRM / Ferane 6.2 Start of August
	7	The agency has neither records nor any monitoring or control over sub-agents.	As per information gathered from the representatives of T.M. Overseas, there are 14 formal agents across the three (3) offices in Bangladesh who are engaged in the recruitment process of Bangladesh FCWs. They are directly employed by the agency. However, it was also shared that there are many informal sub-agents involved in the recruitment process, who mobilize workers from their respective remote places in Bangladesh. T.M. Overseas does not maintain any records or details about these informal sub-agents and has never monitored their roles, according to agency representative during the online interview. These sub-agents have not been trained on REAL's ethical recruitment policies and procedures or its Code of Conduct.	There is a gap in the current labour service agreement between RGL and TM Overseas which does not enforce the obligation of the agent to disclose all parties (offices and sub-agents) in the recruitment chain. The supplier audits conducted in October 2022 was extended to only the 03 offices of the agents in the village of Bangladesh.	7.1 Add within contract with main recruitment agent that the service provider bears the responsibility to provide full traceability of all its subagents up until village level and ensure that no fees are paid along the chain by workers in case any fees are paid by workers, reimbursement must be paid by the main agency. 7.2 Provide comprehensive training to all agents & sub-agents used by REAL on REAL's ethical recruitment policy and procedures as well as the code of conduct to be adhered to during the recruitment process and document such trainings. 7.3 Conduct regular, ongoing monitoring of any and all agents used during recruitment to verify agents' compliance to ethical recruitment requirements. 7.4 Ensure labor agents provide migrant workers with REAL's recruitment policies as well as copy of their employment contract in a language they understand.	7.1 An addendum to the current LSA will be made to clear responsibility of T.M Overseas to provide full traceability of all its subagents up until village level. The main labour agency shall ensure reimbursement of fees to workers for transport, documentation or photocopies along the recruitment chain that starts from the sub-agent in Village. RGL shall include in its due-diligence, on site verification in source country the monitoring and audits of its sub agent and shall ensure that this process is documented with improvement action plan and updated as needed. 7.2 Training will be schedule in next onsite visit in source country in the 2nd week of August 2023. Please refer to attachment 7.2 for the current content materials. 7.3 RGL Labour Supplier's Management Systems Auditing Process (SMS-RE-037) has been done twice last year 2022 and same exercise will be extended to Sub-Agents if any during next on-site visit in Bangladesh on the 2nd week of August. 7.4 All RGL policies on recruitment will be communicated with RGL representative prior to hiring and selection process. Employment contract is already address in point 2.2.	7.1 End July 7.2 Start of August HRM / Ferane 7.3 Start of August 7.4 Next recruitment batch
1D - Foreign Worker Contracts & Communication of Employment Terms	8	The Work Permits of 207 out of 676 FCWs have expired, with expiry time period ranging from January 2022 to July 2023.	Factory management has applied for the renewal of the 206 expired work permits; one Malagasy worker's passport has also expired and needs to be renewed (which is in process). Factory management has documented records of the work permit applications for all the 206 directly and indirectly employed FCWs, as well as a special appeal letter for workers exceeding 10 years of service in the country. None of the Malagasy workers currently employed at REAL have an extended or valid work permit, even though their permits expired in the year 2020. Factory management applied to renew these outdated permits in June 2022, after the Mauritius Government began issuing new work permits again after not having done so for two (2) years due to the COVID-19 pandemic.	The ministry of labour has 2.5 years of backlogs in work permit processing due to the COVID 19 pandemic. Different representations have been made to the MEVA (Mauritius Export Association) and directed to the Ministry of labour. (Email copies attached for your reference).	8.1 Follow up with Mauritian government to ensure renewal of 206 foreign contract workers' work permits. 8.2 Ensure the Malagasy worker receives a new passport without delay and REAL apply for a new work permit without delay. 8.3 Establish a written policy and procedure to ensure that work permits are always renewed in a timely manner.	8.1 Strict follow up being done with the Ministry to have the work permit available for the 206 FCW. A meeting request has been initiated with the Ministry of Labour by our Administrative and Finance Director. RGL undertakes the responsibility to update our buyers on the work permit progress on a monthly basis for transparency. 8.2 New passport of the Malagasy worker will be received end of month. Follow up email has been addressed to the Malagasy embassy in Mauritius. Copy of this communication provided as evidence. For this specific case, we shall communicate the progress to our buyers. 8.3 Internal policy of RGL states that Application for renewal of work permit is done four month in advance and prior to the expiry of the current permit. The delay is beyond the control of the company and is pending at the Governmental level.	HRM / Ferane 8.1 End Sept 8.2 End July
	-	A copy of the Employment Contract letter is not provided to the workers. See also Section 1A (finding no. 2) on Forced Labor and Human Trafficking Policy.		Refer to CA 2.1 & CA 2.2 of section 1A			
Pre-departure orientation	9	There is no "pre-departure orientation" conducted for migrant workers before they leave their home country.	All interviewed Bangladeshi workers stated that they were verbally informed by the recruitment agent of the basic terms and conditions, including salary, but they could not remember any proper pre-departure orientation in Bangladesh with the presence of any REAL Garments representative. Management shared that they do conduct pre-departure orientation in Bangladesh with PowerPoint presentation that they use, but none of the interviewed workers remembered a PowerPoint or other orientation materials.	Workers seem to be confused and lost in all the trainings sessions conducted in home country prior to departure. We believed that emphasis should be laid specific to the content of pre-departure training with new workers signature. Training effectiveness and feedback has not been tested for the home country trainings.	9.1 Prior to migrant workers' departure from their country of origin, REAL Garments and recruitment agency partners or any sub-agents utilized for the recruitment of workers should clearly communicate, the terms and conditions of employment, legal rights and obligations. 9.2 Assign designated "HR person" for migrant workers relevant population (e.g. Bangladesh HR referent) who's native from the sending country and travels there during recruitment and pre-departure orientation as Real representative and to guarantee transparency and clear understanding of contract terms, company policies etc for new employees (e.g. deduction to food and accommodations allowed by law, no fees to be paid for recruitment etc.)	9.1 It is already the policy of RGL to conduct pre-departure training by HR Rep with a translator. Photos of pre-departure training, attendance sheet and content slides are kept on records for each re-departure batch. Auditors did <u>not</u> ask for content of presentation during management interviews to see the communication that is addressed to workers. The HR Manager even showed to the auditor pictures of pre-departure training that has been done for the two recent recruitment batch last year. 9.2 RGL independently appoints a translator in home country, who is remunerated by the company for all communication on policies, contract of employment explanation, pre-departure training, etc. Moving ahead, RGL shall assess the effectiveness of pre-departure training through surveys in worker language and undertake root cause analysis with actionable steps to improve communication and test workers' understanding of policies and training carried out in home country. In addition to verbal communication, RGL commits to providing hard copy of employment handbook to all workers during pre-departure training, which workers can retain for reference.	HRM / Ferane Completed

1E - Freedom of Movement	10	One (1) of two (2) exit gates at the factory compound, which also contains two (2) of the dormitories, was found to be closed during working hours, except during break times.	It was noted that one (1) of the two (2) exit gates to leave the factory and dormitory compound is kept locked during the factory's operational hours and is opened only during workers' break periods. The second exit is at the main gate where security is posted, and workers can only exit through this gate with written approval (gate pass) from the HR Manager and by entering their details into the register maintained by the security guards.	Head of security has been following the CTPAT Guidelines for the factory and given that our dormitories are on the same compound of factory, the same protocol has been applied to the dormitory side which has two dedicated gates.	10.1 All exit gates to be kept open and unobstructed at all times during the time the factory is operational. Training shall be provided to the watchman to ensure that freedom of movement is not impacted.	10.1 The factory premise including dormitories has 03 main exit gates. The Gates were kept closed as the factory is a certified CTPAT premise. However, following this assessment, management has agreed to keep all dormitory gates opened but under the supervision of a watch man.	HRM / Ferane	Completed
	11	The notice regarding movement from the production floors displayed at the workplace was not comprehensively descriptive.	The notice displayed at the workplace (main factory) states that "no worker is allowed to leave their workplace and/or the factory floor until the time of their break and/or the end of shift." It does not mention any provision for exceptional and emergency situations (e.g. health problems, urgent phone calls, any other emergency). Such exceptions are provided in practice, but the existing notice does not include that.	Departmental managers not seeking HR/Management approval for communication / content being affixed in their production departments therefore communication which is against our policies are posted.	11.1 Review the language in the notice on the main factory's display and ensure it clarifies that workers may leave the factory under reasonable circumstances (in an emergency or as a matter of personal urgency of illness).	11.1 The content of this communication has been removed as it is against our policy on freedom of movement. This was posted by departmental managers. Policy awareness meeting will be conducted with managers on freedom of movement policy of RGL. All posters that will be affixed in production departments shall henceforth go through an internal approval process by the HR Manager and General Manager.	HRM / Ferane	11.1 End July
	-	Management does not provide workers with the original copies of their work or resident permits issued by the Mauritius Government. See also Section 1A (finding no. 1) on Forced Labor and Human Trafficking Policy.			Refer to CA's 1.1, 1.2 & 1.3 of section 1A.			

2. LABOR

Section	Finding No.	DESCRIPTION OF FINDING (VERITE REPORT)	EVIDENCE OBSERVED (Verite Report)	ROOT CAUSE IDENTIFIED BY REAL GARMENTS	Brand Recommendations based on Verite's Recommendations	DETAILS OF ACTION TAKEN (AND TO BE TAKEN) BY REAL Garments	Responsible Dept./Person at REAL Garments	Completion date (proposed by REAL)
2B - Working Time	12	Workers' weekly working hours exceeded 60 hours at the time of the assessment.	At the time of the assessment, workers were found to work from 7:30am to 8:30pm, for a total of 13 daily hours including a break of one (1) hour. Actual working hours per day are 12 hours (which is legally valid per the Mauritius Workers' Rights Act Section 20) from Monday to Friday, as well as a half-day (6 hours) on Saturday. Total weekly working hours come out to 66 hours. Mauritius Laws allows a maximum of 46 hours of regular working hours per week and there are no legal limitations on overtime hours per week, so the above is not a legal violation in terms of country law. However, hours in excess of 60 per week, including both regular and overtime hours, is a violation of Verite, industry, buyer codes and other international standards.	As per local law, break time is not included in working hours calculation. Therefore, during the assessment, the factory worked for 12 hours for 5 days which sums up to 60 hours per week. This is within Verite, industry, buyer codes and other international standards. Saturdays and Sundays are normally off if the factory reaches 60 hours during week days.	12.1 Ensure that the total working hour per week, including both regular and overtime hours for any employee does not exceed 60 hours.	12.1 RGL has an internal daily monitoring of working hours to ensure there is no excess over 60 hours per week. Every Thursday, an email alert is sent to Production department to inform actual hours performed against the standard overtime hours per week. Adding to that for any overtime conducted on a daily basis, workers are being kept aware one day in advance and all overtime is voluntary. On a regular basis, most of our department are working within 60 hours per week.	HRM / Ferane	Completed
2E - Freedom of Association	13	All workers interviewed had low levels of awareness regarding the worker's council.	All interviewed workers had low levels of awareness regarding the selection and election process for members of the worker's council. Worker council members also had limited knowledge of roles and responsibilities of the member workers.	The training awareness conducted on September 2022 (prior to the election of WC Committee members) was through the traditional means of posters in workers native language. We acknowledged it has not been effective enough to pass on the key and important message of the importance and roles and responsibilities of workers committee members.	15.1 Improve workers' awareness level regarding the purpose and objective of the worker's council through periodic law trainings. 15.2 Provide refresher training on the roles and responsibilities and functioning of the council. 15.3 Management should inform migrant workers of their rights to freedom of association and collective bargaining and provide relevant information to migrant workers in a language and format understood by them on how to join a trade union or approach trade union representatives.	15.1 A video interactive training awareness will be designed in Bengali, Hindi, Malagasy and Creole language to improve the awareness on purpose and objective of WC committees. This training will be documented and shared with our buyers by 30 Sept 2023. 15.2 Two full days training were done with works council members on December 2022 and a training manual that contains the detailed functioning of WC Committees in Bengali language was provided to all workers committee members. Nevertheless, refresher training will be planned before 30 Sept 2023 on roles and responsibilities of Works Council in the own worker language. Given the importance of social dialogue between Management and workers, the effectiveness of all awareness trainings with workers on Workers Council and with the members of WC Committees will be assessed and improved systematically. 15.3 RGL will request the Ministry of labour to conduct awareness training on workers rights to freedom of association and collective bargaining. The benefits of joining unions and how to join or form unions will be explained and signed by workers.	HRM / Ferane	15.1 End of Sept 15.2 End of Sept 15.3 End of Sept
	16	There were issues with the workers' council.	It was reported by worker members of the council that at present the HR manager takes care of the proceedings of the worker's council meetings. They have no information regarding any recording or documentation of the meeting proceedings, agenda, or resolution made therein. The worker members also pointed out that there is a significant delay in raising any issue due to the frequency of the council meetings, which is once every two (2) months. This delays the redressal of any issues on a real-time basis.	Besides the two days training dedicated to works council members, that englobes all their roles and responsibilities, and explanatory sessions on how to conduct pre-meetings, there has been no further training on capacity building such as basic listening, writing and meeting ethics for them to freely conduct their pre-meeting.	16.1 Invest in building the capacity of the worker members of the council so that they can document the proceedings of the meeting and actualize their roles and responsibilities as members of the council. 16.2 The worker councils should be stand-alone entities that operate autonomously, not linked to HR / factory management. 16.3 Review the frequency of the meetings of the council to allow for more regular redressal of grievances raised by the workers and/or the council members.	16.1 The present Works council set up holds a pre-meeting among themselves 2 weeks before their meeting with Management. They have their own chairperson, secretary and members. They derived their own agenda and minutes of meetings. They use the voting method to finalise on which items they will discuss in priority during their meeting with Management. Training / role play / illustration on active listening, notes taking, how to conduct meetings have already been used to make them at ease in their roles. A training needs analysis will be conducted with the members to see what further complexities they will require during the exercise of their duties. 16.2 Workers Council is already a stand alone mechanism body that function on its own, this is already highlighted in our grievance protocol. The link to the HR factory management is only when there is a need for information or when the information is not solved at bottom level. To make workers well versed on grievance protocol, RGL will include this aspect of grievance mechanism in our refresher training plan. 16.3 Frequency of meeting has already been reviewed to once per month	HRM / Ferane	16.1 End of Sept 16.2 Completed 16.3 Completed
2F - Grievances	14	Grievances are not documented in the grievance records	Grievances received verbally by supervisors and HR as well as grievances received through the suggestion box are not documented in the grievance records.	The grievance mechanism records only grievances which are shared to the Welfare officers (Grievance log book) and Workers Committee meeting (Minutes of meeting). Workers did not have recourse to address issues via suggestion box as Management practice open door policy.	17.1 Update the procedure for handling grievances, in a language workers understand, to ensure consistent documentation of the entire grievance process, including the initial grievance, investigation, actions taken, and any appeals and ensure the resolution is communicated to workers. Maintain all grievance documentation on file.	17.1 RGL shall undertake the necessary steps towards revising the current grievance mechanism by making it simple and user friendly for the workers without adding levels and complexity to solve grievances. With the participation of Workers Committee members, the grievance policy and procedure shall be revised to outline clear procedure for grievance recording, investigation, actions taken, remedial action for non recurrence. A factory wide awareness training will be conducted in workers' native language.	HRM / Ferane	End August
	15	Issues pertaining to safe working and living conditions are recurrent in nature.	As per the review of grievance records, issues pertaining to safe working and living conditions are recurrent, even after resolutions are made by the councils. In every council meeting, the same issues were raised of unclear toilets, broken and damaged equipment, ceiling leaks, etc. It was observed that management is taking a "spot fixing" approach rather than proactively finding the root causes and adopting systematic, comprehensive, sustainable solutions.	All issues identified related to Safety and Health questioned the effectiveness of our monitoring with regards to the living conditions of all dormitories and our immediate actions plans. The reason why we have implemented the daily dormitory Safety and health & housekeeping checklist.	18.1 Undertake root-cause analysis of recurring issues in relation to working and living conditions and prepare a risk-mitigation plan with responsibilities assigned to designated persons. 18.2 Establish an internal risk assessment mechanism to proactively identify and assess all the health and safety related risks in both the factories and all dormitories on a regular basis.	18.1 RGL is engaging to review its full fledged health and safety mechanism system involving problem identification, root cause analysis, preventive maintenance and finally risk mitigation.	HRM / SHO	End July
3. WORKING & LIVING CONDITIONS								
Section	Finding No.	DESCRIPTION OF FINDING	EVIDENCE OBSERVED	PROPOSED CORRECTIVE ACTIONS	DETAILS OF ACTION TAKEN (AND TO BE TAKEN)	Responsible Dept./Person	Proposed Completion date	
3A - Worker Accommodation	16	The assessment revealed that the worker accommodations were in a state of poor cleanliness, safety, hygiene, and maintenance. Workers living conditions were unsatisfactory, with a number of issues identified during the visits.	LTK1 & LTK2 Dormitories, Peurbux & Sham Hostels: -low levels of cleanliness -unsanitary and dirty kitchen area / gas stove / food handling not in compliance with hygiene standards -cobwebs, cracks in floors, leaks in ceilings	Daily Dormitories checklist for Safety and Health and Housekeeping inspection has been developed to discipline the welfare officers and changing their mindset to keep all dormitories in a acceptable living standard and in a consistency manner.	19.1 Facility management to undertake visual inspection in each dormitory & carry out thorough cleaning & repairs as required to provide a clean, sanitary and safe environment for all workers. 19.2 Facility management to undertake 3rd party structural assessment in all dormitories to adequately address building integrity and safety. 19.3 Establish a full-time team to oversee ALL corrective actions required to bring dormitories standards up to acceptable levels and maintain them over time.	19.1 A daily Dormitory & Messroom Safety & Health Inspection checklist was already implemented for each dormitory including Kitchen, Messroom, Sanitary Conveniences and Accommodation room. However, the welfare officers were sensitized to strictly conduct daily inspection of the dormitories facility. Each non conformity will be reported to Compliance Manager and SHO. Issues raised will be then attended by the Maintenance Dept. 19.2 Building structural report is available for both factory and in house dormitories. Building stability report for Off site dormitories shall be made available by mid August 2023 19.3 The Compliance Manager, HR Manager, Safety and Health Officer, Maintenance Manager and Welfare Officer shall be accountable to oversee all corrective actions.	SHOWwelfare Officer/Compliance Manager/ Maintenance Manager	19.1 End July 2023

<p>Ventilation & Lighting:</p> <ul style="list-style-type: none"> • LTK 1/2 very hot, strong stench = lack of ventilation or fans • LTK 1/2 crowded rooms / no windows / dark & cramped inadequate lighting • no ceiling fans in any of the 6 hostels • smaller table fans purchased by workers, attached to beds (unsafe) 	<p>We needed to identify a proper and standard way of fixing individual fans next to each bunk bed which will also provide safety to the lodgers.</p>	<p>19.3 Improve the ventilation and lighting of the dormitory rooms to ensure adequate air quality and natural light for the workers. For example, installing windows, fans, other devices to regulate temperature & humidity (esp. in LTK1 and LTK2).</p> <p>19.4 Ceiling fans along with wall mounted fans shall be installed in the dormitories rooms for maintaining a comfortable temperature for all the workers in the room.</p> <p>19.5 The lighting inside each room in the dormitory should also be sufficient for the workers to read, study, or perform other activities in their sleeping space.</p>	<p>19.4 Ceiling fans already in place in many areas of all dormitories. However, to improve further ventilation, structural provisions have been made to provide individual fan support for each lodgers fixed at the bunk beds. Please see attached a model of one sleeping room equipped with individual fan and the fan support.</p> <p>19.5 We have conducted a thorough visit in all dormitory rooms and have added lighting where needed.</p>	<p>Compliance Manager / Maintenance Manager</p>	<p>19.4 End of July 23</p>
<p>Hygiene:</p> <ul style="list-style-type: none"> • bedbugs / cockroach infestation / poor quality bedding • toilet areas wet & slippery • Sham hostel: ceiling leak, broken toilets, inadequate lighting at emergency exit. 	<p>For the past years, the designated Pest Control services was contracted to provide services every three months which has contributed to the infestation of bedbugs and cockroach. New Pest Control contractor is now on board effective June 2023 and with a monthly contract agreement and monitoring.</p>	<p>19.6 Facility management to undertake more frequent pest control and elimination in all dormitories</p> <p>19.7 Peerbux Hostel:</p> <ul style="list-style-type: none"> • repair all leaks • install additional water tanks or pumps for adequate water supply. • repair loose water tap and water leakage in bathroom • clean and disinfect bathroom and notice board of pests <p>19.8 Sham Hostel:</p> <ul style="list-style-type: none"> • repair leaks in roof ceiling of room no. 6 • repair/replace broken toilet flush, water tank handler, toilet cover, toilet seats • maintain all equipment and fixtures by cleaning, repairing or replacing as needed <p>19.9 Provide soap for hand washing in all hostels and replenish as needed per the monitoring of usage</p> <p>19.10 Keep records of all equipment, their condition and maintenance.</p>	<p>19.6 Facility has appointed new Pest Control Services and thus Pest Control is being done on a monthly basis for all dormitories. Moreover, pest control services is available for any spraying services outside the monthly contractual agreement to be done in dormitories.</p> <p>19.7. Peerbux Hostel</p> <ul style="list-style-type: none"> • An assessment has been made by the maintenance team in Peerbux Dormitory to identify the source of leaks. Repairs has been completed. • It is good to take note from Jan to April we had a drought season in Mauritius which impacted on the water supply including Peerbux. Consequently, lodgers were storing water in containers for their own use. As from May to now, the situation has improved with the arrival of rains and the water supply is regulated and distributed normally. Consequently all water containers have been removed. • Cleaning is done on a daily basis ensuring they are kept clean and tidy. Refer 19.1 <p>19.8. Sham Hostel</p> <ul style="list-style-type: none"> • An assessment was conducted by the maintenance team to assess the root cause of the leakage. Repairs in progress. • Dormitories preventative checklist have been reviewed to verify and ensure that all equipments including fire safety items are being monitored by the maintenance team in an effective manner on a weekly and monthly basis. <p>19.9. Soap hand wash has been replenished in all hostels wherever required.</p>	<p>19.6 Compliance Manager / HSO</p> <p>19.7 Maintenance Manager / HSO</p> <p>19.8 Maintenance Manager / HSO / Compliance Manager</p> <p>19.9 Welfare Officers</p> <p>19.10 SHO</p>	<p>19.8 End of July 23</p>
<p>Storage:</p> <ul style="list-style-type: none"> • insufficient storage capacity per number of workers leading to cluttered spaces in all dormitories • lack of drying spaces for clothing 	<p>Issue was already noted few months back and it was in our plan to provide all lodgers with additional lockers. Please see pic attached</p>	<p>19.11 Provide adequate lockable accessible storage spaces for the workers' belongings to avoid clutter and ensure orderliness and hygiene in the rooms.</p>	<p>19.11</p> <ul style="list-style-type: none"> • Each lodger is provided with 2 lockers in each dormitories. Additionally, a new locker area will be provided to all lodgers within the facility premises. • A designated drying clothes area has been identified for lodgers staying in LTK 1 & LTK 2 and appropriate structure is being done. 	<p>19.11 Welfare Officers/HR/HSO/Compliance Manager</p>	<p>19.11 End of August 23</p>
<p>Emergency Equipment:</p> <ul style="list-style-type: none"> • Access to fire extinguishers was blocked. • The fire extinguishers on the ground floor of the LTK1 hostel and on the second floor of the LTK2 hostel were not charged. • The first aid box in the first-floor dining hall at the Peerbux hostel was obstructed by a chair and a table. • The fire extinguisher on the second floor of the Peerbux hostel was inaccessible and blocked. No fire alarm, posing serious risk of fire hazard and danger the lives of residents. • Equipment and fixtures in the SHAM hostel were not well maintained. 	<p>Missing the Dormitories Daily Inspection checklist which would discipline the welfare officers to understand and abide to the standard.</p>	<p>19.12 Remove all obstructions from fire extinguishers and first aid boxes in all dormitories. For example, paint "don't block" stripes around these key spaces to remind all to "keep free".</p> <p>19.13 Recharge fire extinguishers in LTK1 & LTK2 hostels via a qualified service provider.</p> <p>19.14 Designate responsible person in charge for checking expiry date and pressure gauges of all fire extinguishers regularly in each dormitory/ hostel and ensure records are kept.</p> <p>19.15 Check & adequately maintain equipment and fixtures at Sham hostel</p> <p>19.16 Install adequate light outside the area of washing that is also used as an emergency exit at the Sham hostel.</p>	<p>19.12 Don't block stripes was renewed. Obstructions causing to fire extinguisher and first aid boxes in LTK 1 & LTK 2 dormitories were removed. Yellow marking have been repainted in all dormitories to show aisles and exit and to ensure that all fire safety items including first aid boxes are kept free from obstruction.</p> <p>19.13 - Low pressure fire extinguisher was replaced in LTK 1 and LTK 2. Dormitories preventative checklist have been reviewed to verify and ensure that all equipments including fire safety items are being monitored by the maintenance team in an effective manner on a weekly and monthly basis.</p> <ul style="list-style-type: none"> • As per Occupational Safety and Health (Employees' Lodging Accommodation) regulations 2011, section 19 subsection (4) states that "where more than 60 employees is lodged in a lodging accommodation, the employer shall provide a fire warning system". The max lodging capacity of Peerbux hostel is 60 and the total number of lodgers is 52. Thus, the fire warning system is not applicable. <p>19.14 Dormitories preventative checklist have been reviewed to verify and ensure that all equipments including fire safety items are being monitored by the maintenance team in an effective manner on a weekly and monthly basis.</p> <p>19.15 A daily Dormitory & Messroom Safety & Health inspection checklist has already been implemented for monitoring & maintaining equipments & fixtures. However, the welfare officers were sensitized to strictly conduct daily inspection of the dormitories facility. Each non conformity will be reported to Compliance Manager and SHO. Issues raised will be then attended by the Maintenance Dept.</p> <p>19.16 Adequate fog light will be installed at the Washing Area.</p>	<p>19.12 Maintenance Manager</p> <p>19.13 HSO</p> <p>19.14 Welfare Officers/SHO/Compliance Manager</p> <p>19.15 Welfare Officers/SHO/Compliance Manager/Maintenance Manager</p> <p>19.16 Maintenance Manager</p>	<p>19.16 End of July 2023</p>
<p>Potable Water:</p> <ul style="list-style-type: none"> • lack of potable water on all floors except ground floor (LTK 1/2), insufficient supply at Peerbux 	<p>It did not come up to us</p>	<p>19.17 Adequate number of drinking water point shall be made available on each floor the dormitory building(s) for the workers. Annual test of potability of water are to be posted next to each drinking water station.</p> <p>19.18 Provide potable water on each floor of the Sham hostel by installing additional taps or dispensers, or connecting to a reliable/tested source of water.</p>	<p>19.17. Additional drinking water stations shall be installed in each floor of LTK1 and LTK 2 and SHAM Dormitory. The test report shall be posted next to each drinking water station in both factories and dormitories.</p>	<p>Compliance Manager / HSO / Maintenance Manager</p>	<p>End of Aug 2023</p>

			<p>Training: - Lack of training of workers on importance of clean, hygienic, health and safe accommodation</p> <p>Records: No certificates or inspection from governmental health authorities or kitchens and canteens displayed at LTK1 and LTK2 dorms. Safety & Health Policy posted on 2nd floor of Peerbux hostel was displayed in Hindi, which was not understandable by Bangla-speaking residents. No records / documentation kept for dorm cleaning.</p>	<p>Missing the required training on Hygiene and food and waste management.</p> <p>All documents /certificates were displayed before and at the time of audit</p>	<p>19.19 The factory management shall provide training and awareness-raising activities for the workers on the importance of maintaining clean, hygienic, healthy, and safe accommodations and cover topics such as personal hygiene, waste management, food management, pest control, fire prevention, electrical safety, and emergency procedures.</p> <p>19.20 The management shall enforce a clear and consistent set of rules and regulations for the workers regarding their accommodation. The rules and regulations should specify the dos and don'ts for the workers in terms of their behavior, activities, and belongings in the dormitories.</p> <p>19.21 Display the Safety and Health Policy in Bangla language in the Peerbux hostel in a legible format.</p> <p>19.22 Update the names of the emergency services personnel in the Peerbux hostel, as well as in any other hostel where they are displayed.</p>	<p>19.19. A training calendar from Compliance and Safety and Health dept is already available and updated since Jan 2023 till Dec 2023 However and as mentioned training shall be conducted to all concern on Personal Hygiene and Waste Mgt that have been created as per recommended.</p> <p>19.20. Rules and Regulations for dos and don'ts will be implemented taking into consideration local law as per Employees' Lodging Accommodation.</p> <p>19.21. The Safety and Health Policy in Bangla Language has been posted in Peerbux Dormitory.</p> <p>19.22. Emergency Services Personnel & numbers posted in all dormitories.</p>	<p>HSO / Compliance Manager</p> <p>HSO</p>	<p>19.19 - 15 Aug 2023</p> <p>19.20 - End of July</p> <p>21.07.2023</p>
3B - Working Conditions	17	<p>The factories had various health and safety concerns, such as improper installation and functioning of emergency lights and fire extinguishers, unclear and obstructed aisles and exits, unlocked and uncovered electrical panels and wires, removed safety guards of machinery and equipment, excessive temperature and noise in some sections, inadequate provision and usage of personal protective equipment, and poor handling and labelling of chemicals.</p> <p>Emergency Preparedness The installation of emergency fog lights was inadequate and defective in the embroidery section. There was an absence of illumination above the stairwells in an emergency exit at the mezzanine and on the first floor at the embroidery section. It was observed in several sections that the emergency lighting was not functioning (e.g., embroidery section back exit, hand stripping section, first-floor finishing section). One extinguisher was missing. Access to fire extinguishers was not maintained clear at all times. e.g., a fire extinguisher was obstructed in the embroidery section. Access to fire extinguishers was observed to be slippery in the embroidery section. Aisles, hallways, and evacuation paths and exits are not distinctly marked and were impeded in some of the production sections. Yellow lines are confusing, with multiple demarcated lines. An emergency exit was locked at the back door of the main gate exit from the embroidery section, and an exit assembly point was not indicated in this area. Aisles are constantly blocked in this section especially. In the washing section, an emergency push button was obstructed by a sewing machine. First aid rooms are not available within the work section or departments or in the dormitories located within the factory premises. Workers come directly to the part-time doctor if he is available onsite, which is only for approximately 1.5 hours per day, as per the information gathered from workers. In case the doctor is not available, the injured are treated in the production area itself. Aisles are less than 0.90 m and were observed to be only 0.54 cm in a storage area on the second floor. Workers have insufficient space between their work stations that</p> <p>Electrical Safety It was noted that electrical panels with circuit breakers are labelled and covered but not secured, and non-authorized persons can access these at any time. No rubber mats were placed beneath electrical panels for safety insulation. Electrical wires are not adequately covered, and electrical cords were covered with dust and lint.</p> <p>Machine Safety Machinery and equipment do not have operational instructions written in languages comprehensible to operators. Workers regularly removed machine safety guards, and the factory management did not replace them. It was noted that the elevator remains open after use and without safety guard.</p> <p>PPE Factory provides personal protective equipment (PPE) such as ear plugs but does not ensure that all workers are wearing the PPE provided (e.g., a worker in the noisy embroidery section was observed to not be wearing ear plugs). Three (3) workers were not wearing safety shoes in the washing section. Four (4) workers did not have mats in pressing section, and some workers were not wearing closed-toe shoes on the production floor. The Factory could not demonstrate that they have trained workers to understand why PPE is necessary and how to use it effectively (e.g., finger guards, eye guards, ear plugs, safety shoes not, etc.)</p>	<p>Preventative maintenance has been found not working effectively</p> <p>Preventative maintenance is not working effectively</p> <p>Missing a Safe Machines Instruction program for all machines and lift</p> <p>Refreshener training on PPE need to be conducted as a continuous improvement as per training calendar</p>	<p>20.1 Install adequate and functional emergency fog lights above the exit signs in the production areas, especially in the embroidery sections.</p> <p>20.2 Install illumination above the stairwells in the emergency exit at the mezzanine and to the first floor from the embroidery section.</p> <p>20.3 Repair or replace the non-functioning emergency light in the embroidery section back exit, hand stripping section, and first floor finishing section near storage of boxes.</p> <p>20.4 Maintain clear access to the fire extinguisher in the embroidery section by removing any obstruction or clutter and placing signs or markings to indicate its location. Make sure that all fire extinguishers are placed in the designated spaces and are readily accessible at all times.</p> <p>20.5 Mark and clear the aisles, hallways, evacuation paths, and exits in the factory by using yellow lines, signs, or markings, and removing any obstruction or clutter.</p> <p>20.6 Keep the emergency exit in the back door main gate exit from the embroidery section unlocked at all times during the time the factory is operational and indicate the exit assembly point in this area by using signs or markings. Remove locking devices during working hours.</p> <p>20.7 Relocate the sewing machine from the washing section that obstructs the emergency push button.</p> <p>20.8 Provide first aid rooms within the work-sections or departments by allocating adequate space, equipment, and staff for each room.</p> <p>20.9 Ensure aisles are at least 0.9 meters wide. Provide sufficient space between the work stations in the factory by rearranging or relocating the machines, equipment, or furniture which should allow free body movement and prevent any contact with moving parts or hot surfaces.</p> <p>20.10 The factory management shall fix or replace the cover of the electric light in the middle of the corridor in the cutting unit. Undertake regular inspection of all the electrical installations.</p> <p>20.20 Secure and insulate all electrical panels in the factory by locking them with a key or a code and placing rubber mats underneath them. Cover all electrical wires in the factory by using appropriate conduits, cables, or ducts.</p> <p>20.21 Factory management to make available operational instructions in workers' language</p> <p>20.22 Replace missing machinery / elevator safety guards and train factory staff & workers on the importance of maintaining machine safety</p> <p>20.23 Ensure that all the workers in each work-section are appropriately using the PPE provided to them as per the nature of work.</p> <p>20.24 The facility shall designate one person in each work-section to monitor the proper usage of PPEs by all the workers and provide refresh training to all the workers on risk associated with non-usage of PPEs and appropriate usage of the same.</p>	<p>Preventative maintenance checklists were reviewed by SHO to identify any shortcoming in the verification process and any remarks for identify by concerned by maintenance dept on all fire safety items in factory and dormitories.</p> <p>20.1. Additional lights have been installed in the embroidery illuminating the entire section.</p> <p>20.2. Foglight has been installed above stairwells in the exit pathway at the Mezzanine.</p> <p>20.3. Emergency lights in embroidery back section, HandScraping and Finishing (Packing Store) have been replaced.</p> <p>20.4. Fire Extinguisher in embroidery section is now kept free from obstruction and is easily accessible.</p> <p>20.5. Yellow markings with directional arrow along aisles and evacuation pathways have been renewed in several sections including washing, embroidery and Finishing dept. Maintenance dept/ SHO will conduct close monitoring ensuring the yellow markings are done as and when required mainly in production sections.</p> <p>20.6 Emergency exit at the back door is kept open at all times and directional arrow indicating assembly points renewed.</p> <p>20.7. Manual call points located in R & D dept is kept free from any obstruction and HoD has been brainstormed to ensure all fire safety items are not obstructed at all times. Require root cause analysis & defined steps to prevent recurrence.</p> <p>20.8. 26 First aiders have been trained by third party accredited trainer following which internal training were provided to each first aider on their roles and responsibilities towards First Aid Assistance.</p> <p>On each production floor, we have atleast 4 first aiders who are trained to provide first aid assistance to minor injury or sick. Their pictures are affixed to the first aid boxes which are located in areas which are free of obstruction and movement.</p> <p>A medical room is made available within the factory compound where all injured or sick employees are being treated by a company doctor. Following his recommendation, injured or sick workers may be treated on site or depending on the doctor's advice, injured or sick employee are sent to the nearest hospital accompanied by the welfare officer.</p> <p>20.9. The aisles in the Mezzanine Section and Ironing Section shall be redefined and re painted to ensure the width of the aisles is not less than 0.9m.</p> <p>Preventative maintenance checklists including electrical safety were reviewed by SHO to identify any shortcoming in the verification process and any remarks for identify by concerned by maintenance dept.</p> <p>20.10. The electric light fixtures in the middle of the corridor of cutting section has been replaced.</p> <p>20.20. Rubber mats have been placed below electrical panels. Maintenance Manager was instructed to conduct training awareness with concerned electrician on importance of keeping all electrical panels closed after verification and to cover in a safe manner all electrical wires inside trunking.</p> <p>20.21. Procedure on Safe use of all machines shall be made in collaboration with all HoD, Maintenance Manager and Compliance/ Safety and Health Officer.</p> <p>20.22. All sewing machines are now equipped with finger guard, eye guard and pulley guard. Moreover sewing manager and supervisors have been brainstormed to ensure all safety guards are in place at all times. As per our training calendar, a refresh training on importance of safety guard shall be conducted in Aug 2023.</p> <p>The facility has taken positive steps to provide appropriate PPEs items to all operators depending on the nature of work with signature acknowledgement. Close monitoring is done by HoD / Compliance / SHO to ensure employees are strictly adhering to personal protective equipments protocol.</p> <p>20.23. Daily checklist for HoD do includes the use and wearing of PPEs. Moreover, during the facility tours, the Compliance (SHO) do mentioned effectiveness of PPE wearing. Training on PPEs is a continuous process as per the training calendar and refresh training on use of PPE are planned as and when required.</p>	<p>20.1 Maintenance Manager</p> <p>20.2 Maintenance Manager</p> <p>20.3 Maintenance Manager</p> <p>20.4 Maintenance Manager/ HoD</p> <p>20.5 Maintenance Manager</p> <p>20.6 Maintenance Manager / HSO</p> <p>20.7 HoD/ HSO</p> <p>20.9 Maintenance Manager</p> <p>20.10 Maintenance Manager</p> <p>20.20 Maintenance manager</p> <p>20.21 - HoD/Maintenance Manager / Compliance/ HSO</p> <p>HSO / Compliance Manager</p>	<p>28.06.2023</p> <p>Closed</p> <p>20.21 - End of Aug</p> <p>20.22 - End of Aug</p> <p>20.24 End of July</p>	

		<p>Chemical Safety Chemicals are stored in a designated area but are not labelled in workers' native languages. Awareness on handling of chemicals is poor among workers. Uncovered and unlabeled chemicals were found in the washing area and at the store. Workers have access to many empty containers previously filled with unknown liquid that were observed in the washing area and store; there was no proper procedure of washing the container before use. Chemical workers underwent medical surveillance on May 17, 2023, but the report does not show whether the doctor concluded workers are still capable of handling chemical products. The chemical storage area is not maintained in a clean and proper manner. The emergency shower was noted to be dirty and assessed as unsafe for an injured person.□</p>	<p>Refresher training on Chemicals need to be conducted as a continuous improvement as per training calendar</p>	<p>20.25 Label all chemicals in multiple languages spoken by all the workers handling chemicals & provide regular refresher training for all workers on the safe use & handling.</p> <p>20.26 Cover all chemicals in the factory by using appropriate containers, lids, or caps.</p> <p>20.27 Wash and dispose of empty containers properly by following the instructions on the label or the safety data sheet for each chemical. The empty containers should not be reused or recycled for other purposes, unless they are thoroughly cleaned and decontaminated.</p> <p>20.28 Clean and maintain the chemical storage area by using appropriate cleaning products and methods, and keep a record and documentation of their cleaning.</p> <p>20.29 Immediately undertake a medical surveillance report for chemical workers by conducting a medical examination for each worker who handles chemicals regularly or occasionally. The medical examination should be done by a qualified doctor who can assess the worker's health status and fitness for work.</p>	<p>20.25. All chemicals containers are labelled in native languages for workers and appropriate SDS are posted in the chemical stores. Last training on chemical mgmt procedure & safe handling conducted on Dec 22. Refresher training on chemical handling and use will be conducted on August 23.</p> <p>20.26. All chemical operators, supervisors and Manager have been brainstormed to ensure that all chemical containers are properly store with appropriate lids covers after use including the empty chemical containers stored in designated area to be returned to chemical supplier.</p> <p>20.27. As per our Environmental Management Plan, all empty chemical containers are stored in a specifically designated area. These containers are subsequently collected by the supplier. No empty chemical containers are given to any other party for their own use.</p> <p>20.28. Chemical store keepers were strictly recommended to clean all chemical stores as and when required during their working shift. HoD and SHO will conduct daily check including the monitoring of cleanliness and tidiness in the chemical stores and the laundry.</p> <p>20.29. Medical surveillance is conducted every 6 months for operatives handling chemicals. Last Health Surveillance conducted on 28/06/23. The Health Surveillance Checklist has been amended to include "Fit to Work" (YES/NO) as would recommended by the company doctor.</p>	<p>HoD/SHO/Compliance Manager</p>	<p>20.28- End July 2023</p>
		<p>Potable Water The factory has provisioned for potable water for all workers in the non-production area. Access to the water station is not restricted, but workers have to stoop down to drink, as the faucet is too low. The area where the water station is located is not hygienic, and there are no adequate safeguards to prevent any form of contamination from entering the water. Workers also do not have access to individual or disposable drinking vessels.</p>		<p>20.30 Raise the faucet at the water station so that it is easily accessible for the workers, and maintain the hygiene of the area where the water station is located by using appropriate cleaning products and methods. Keep a record and documentation of cleaning.</p> <p>20.31 Provide individual named or disposable drinking vessels for the workers by replenishing them daily or as needed and monitor their usage.</p> <p>20.32 Display certificates or inspections from governmental health authorities for kitchens and canteens in the factory.</p>	<p>20.30 All drinking water station including drinking water at the Chemical Store are positioned in a safe and accessible manner.</p> <p>20.31 Each worker has been provided with a drinking water pouch, specifically designed to accommodate their water bottles. The pouch is labelled "Drinking Water" for identification and is easily hangable or can be placed aside when not in use. This system ensures that each worker's water bottle is readily accessible and can be securely stored, minimizing the risk of mixups or contamination. Each floor consists of a drinking water station which is easily accessible to workers.</p> <p>20.32 All Health Clearance Certificates are already posted in all existing dormitories including the factory's kitchen.</p>	<p>20.31 HoD 20.32 Compliance Manager</p>	<p>28.06.2023</p>
		<p>Other The factory exhibits water leaks and waste outside the premises. Hazardous materials are not stored appropriately, creating potential hazards. The factory also does not maintain any waste records.</p> <p>Although the factory implemented a ventilation system, it was inefficient and sporadically cleaned. The temperature was excessively high in the ironing section.</p> <p>The toilets in the factory were found to be filthy and smelled and were not cleaned on regular basis.</p> <p>In the other factory (cutting process only) located 2 kilometers from the main factory, the cover of an electric light was found hanging in the middle of the corridor. Also, one of the factory's three (3) exits was found closed.</p>	<p>Missing a Daily Safety and Health and Compliance checklist addressed to each of dept head to be filled and counter check by Compliance /SHO .</p>	<p>20.33 Clean the floors in the kitchens and canteens regularly by using appropriate cleaning products and methods, and keeping a record and documentation of their cleaning. Cover the dust bin near the kitchen by using a lid, a bag, or a reel. The dust bin near the kitchen should not be left open or exposed to air, light, or heat. The dust bin near the kitchen should also be emptied regularly and disposed of in a designated area that is secure and hygienic.</p> <p>20.34 Improve the ventilation system in the factory by cleaning, repairing, or replacing it as needed, and keeping a record of its condition and maintenance. Reduce the temperature in the ironing section by installing fans, air conditioners, or other cooling devices, or by relocating the ironing machines to a more ventilated area.</p> <p>20.35 Clean the toilets in the factory regularly by using appropriate cleaning products and methods, and keeping a record and documentation of their cleaning.</p>	<p>20.33. A daily Safety & Health inspection checklist has already been implemented for monitoring & maintaining equipments & fixtures. However, the welfare officers were sensitized to strictly conduct daily inspection of the dormitories facility. Each non conformity will be reported to Compliance Manager and SHO. Issues raised will be then attended by the Maintenance Dept. Moreover all waste bins in the kitchen are properly covered and identified.</p> <p>20.34. 2 additional fans have been installed in the ironing dept. for proper ventilation.</p> <p>20.35 A Cleaning log book will be implemented where the cleaning schedule of all toilet will be noted .</p>	<p>20.33 Welfare Officers 20.34 Maintenance Manager / Compliance Manager</p>	<p>20.33- 18.07.2023 20.34- 28.06.2023</p>