

Compliance Assessment Report



Newage Apparels Limited

04/06/2024 (dd/mm/yyyy)

Assessment Start date: 28/04/2024 (dd/mm/yyyy)

Assessment End date: 29/04/2024 (dd/mm/yyyy)

Cycle: 6

Modality: HYBRID

Report ID: 2101

Country: Bangladesh

Product type: Sewing or Final Product Assembly, Printing or Dyeing

Supplier Name: Newage Apparels Limited

Supplier Address: Holding – 06/66/01, Road- 11, Block – L, Ward- 06, Nischintapur, Purbo
Norshingpur, Ashulia, Savar, Dhaka - 1341

This compliance report includes information about this factory's compliance performance at the time of the Better Work assessment. The key compliance results are explained in more detail on the following pages.

Copyright Better Work 2022

This publication contains confidential, proprietary and privileged information intended solely for the use, in whole or in part, of those with explicit written permission from Better Work. This report may only be distributed by Better Work. Better Work cannot guarantee the authenticity of the report if received through any other means.

Table of Contents

Factory Visit Information

General information on the factory, on its key strengths and on the assessment process itself.

Management Systems

Management systems information of the factory

Overview of Non-Compliance

Overview of the areas of non-compliance found in the factory during the assessment visit.

Detailed Non-Compliance Findings

The following section presents the non-compliance findings recorded by the Enterprise Advisors during the assessment visit.

Additional Information

The following section presents additional comments provided by the Enterprise Advisor.

Better Work Clusters and Compliance Points

Full list of clusters and compliance points assessed during a Better Work compliance assessment visit.

Factory Visit Information

The following section includes general information on the factory, on its key strengths, and on the assessment process itself.

Key Strengths and Process Integrity

Question	Answer
Was any part of the assessment conducted virtually?	Yes. Some virtual verification activity was conducted.
What is the total number of employee interviews conducted?	41
Provide details about number of employees interviewed	<p>Number of workers interviewed: 41 (male: 15, female: 26)</p> <p>Individual: 23 (male-09, female-14); 04 group interviews: 18 (male: 06, female: 12), (Participation Committee, Safety Committee, New workers, Disable workers)</p> <p>Sections covered: Workers were selected by the assessors from the cutting, sewing, finishing, embroidery, printing, utility, and security sections for the interview.</p> <p>Interview location: Interviews were conducted in a separate area free from management presence such as in the worker's dining hall, inspection room, and corner of the production floor or stairs.</p> <p>Sample selection process: Workers were randomly selected from different committee lists, personnel files, payroll, and factory tours.</p>
Did the Enterprise Advisor(s) conduct an offsite documentation review?	No
1. Cooperativeness of facility	The enterprise was cooperative and showed positive attitude during the assessment.
2. Strengths of management practices	Nothing significant.
3. Any other comments	None

Freedom of Association and Collective Bargaining

Question	Answer
Does the facility have a registered trade union(s) on-site?	No

How many Collective Bargaining Agreements (CBAs) have there been in effect at the facility during the assessment timeframe? (Ref 8979)	0
How many industrial actions/strikes have occurred? (Ref 7647)	0

Contracts and Human Resources

Question	Answer
Facility is the legal owner of the site:	Yes
Total number of workers: (Ref 18130)	3750
Number of male workers: (Ref 18131)	1306
Number of full-time workers:	3750
Number of male full-time workers:	1306
Number of permanent workers: (Ref 9046)	3520
Number of male permanent workers: (Ref 9048)	1196
Number of temporary workers: (Ref 9059, 9070)	0
Number of agency/contract workers:	0
Number of contract workers who are not part of the production process:	0
Number of foreign migrant workers: (Ref 11540)	0
Number of domestic migrant workers:	3160
Number of male domestic migrant workers:	1074
Number of workers paid by unit:	0
Number of workers under probation: (Ref 9049)	230
Number of male workers under probation: (Ref 9051)	110
Number of casual workers: (Ref 9063)	0
How many workers under the age of 18 have worked at the facility during the assessment timeframe?	0
Number of workers who are trainees, apprentices or interns: (Ref 9054)	0
Number of workers who are pregnant/breastfeeding:	32
Number of workers with disabilities: (Ref 18154)	6

Number of male workers with disabilities: (Ref 18279)	2
Number of workers who bring work home or work at home exclusively:	0
Number of supervisors: (Ref 13355)	103
Number of male supervisors: (Ref 11538)	95
Number of foreign migrant supervisors: (Ref 7640)	0
Operating License/Registration #:	9658/ Dhaka
Are subcontractors utilized by the facility to complete all or part of the production process? (Ref 7650)	No
Does the facility offer/ participate in any apprenticeship / trainee / internship programs? (Ref 9054)	No
Does the facility use fixed-term contracts?	No
How many workers became disabled (for whatever reason)?	0
How many members are in the bipartite committee?	22
How many female members are in the bipartite committee?	12
How many employer members are in the bipartite committee?	5
How many worker members are in the bipartite committee?	17

Occupational Safety and Health

Question	Answer
Total number of buildings on-site:	8
Number of production buildings on-site:	2
Number of warehouses on-site:	2
Are warehouses within or separate from production buildings?	Warehouses are within production buildings
Number of on-site dormitories:	0
Do workers stay in off-site housing managed or controlled by the facility? (Ref 9213)	No
Is there an on-site canteen/eating area? (Ref 18252)	Yes
Are there on-site childcare facilities?	Yes

Describe any other types of buildings:	Utility building, Secondary Containment & Wastage Area, Parking area etc.
Total Facility Area (m2) - only built premises:	20884
Facility is in a multi-floor building:	Yes
Number of all floors:	6
Floors have been added since original construction:	No
Building is shared with other facilities/enterprises:	Yes
Residential building has been converted into a facility:	No
Residences are located within any facility buildings:	No
Does the facility use laser or radiation producing equipment?	No
Does the facility perform any type of "hot work" (i.e. welding, soldering etc.)?	Yes
Number of work-related injuries that resulted in at least three days of absence from work: (Ref 11606)	15
Number of work-related injuries that resulted in less than three days of absence from work: (Ref 11606)	59
Number of work-related dangerous occurrences in the last 12 months (e.g. collapse, partial collapse, explosions, electrical fire, etc.):	0
Number of commuting injuries in the last 12 months: (Ref 11606)	0
Number of work-related diseases in the last 12 months: (Ref 11606)	0

Working Time

Question	Answer
Normal Hours of Operation per day:	8
Number of Shifts and Hours of Operation for each (Normal Operations):	1; (8 hours)
Number of Shifts and Hours of Operation for each (Peak Operations):	1; (8 hours)
Peak Operation Months:	January, February, March, April, May, July, August, June, September, October, November, December

Management systems

This section of the report contains information on the management systems of the factory, which create an enabling environment for sustainable compliance. This section is specific to BW factory engagement model, and is not a part of the SLCP tool. This information is not transmitted to the SLCP Gateway and is not included in the SLCP verification report.

Human Resources Management

hrm-1	Does the employer have a written HR policy?	Yes
-------	---	-----

hrm-1-1	Is the HR policy signed by top management?	Yes
---------	--	-----

hrm-1-2	Does the HR policy include the following? (SELECT all that apply with an "X")	
<i>hrm-1-2-1</i>	<i>Applicability to all production and non-production workers, regardless of contractual status, including on-site subcontracted workers</i>	✗
<i>hrm-1-2-2</i>	<i>Mandatory minimum age requirements</i>	✗
<i>hrm-1-2-3</i>	<i>Appropriate work for young workers (if relevant)</i>	
<i>hrm-1-2-4</i>	<i>Equal treatment and non-discrimination</i>	✗
<i>hrm-1-2-5</i>	<i>Preventing violence and harassment, including gender-based violence and harassment</i>	✗
<i>hrm-1-2-6</i>	<i>Prohibition on forced labour</i>	✗
<i>hrm-1-2-7</i>	<i>Legal requirements in relation to termination</i>	✗
<i>hrm-1-2-8</i>	<i>Freedom of association</i>	✗
<i>hrm-1-2-9</i>	<i>Working hours</i>	✗
<i>hrm-1-2-10</i>	<i>Compensation</i>	✗
<i>hrm-1-2-11</i>	<i>None of the above</i>	

hrm-2	Does the employer have written recruitment procedures?	Yes
-------	--	-----

hrm-2-1	Does the recruitment procedure describe the following? (SELECT all that apply with an "X")	
<i>hrm-2-1-1</i>	<i>Hiring criteria that are applied equally to all job applicants</i>	✗
<i>hrm-2-1-2</i>	<i>Methods for verifying the age of workers prior to hiring</i>	✗

<i>hrm-2-1-3</i>	<i>Methods for ensuring compliance with legal requirements for workers under age 18 (if relevant)</i>	✗
<i>hrm-2-1-4</i>	<i>Methods for ensuring that workers retain all of their original ID documents</i>	✗
<i>hrm-2-1-5</i>	<i>None of the above</i>	

hrm-3	Does the employer have written disciplinary procedures?	Yes
-------	---	-----

hrm-3-1	Do the disciplinary procedures include the following? (SELECT all that apply with an "X")	
<i>hrm-3-1-1</i>	<i>Clear specification of unacceptable behaviours or performance, such as violence and harassment, including gender-based violence and harassment</i>	✗
<i>hrm-3-1-2</i>	<i>A step-by-step warning system</i>	✗
<i>hrm-3-1-3</i>	<i>Right to representation during disciplinary processes</i>	✗
<i>hrm-3-1-4</i>	<i>Time frames for warnings and payment</i>	✗
<i>hrm-3-1-5</i>	<i>None of the above</i>	

hrm-4	Does the employer have written termination procedures?	Yes
-------	--	-----

hrm-4-1	Do the termination procedures include the following? (SELECT all that apply with an "X")	
<i>hrm-4-1-1</i>	<i>Opportunity for workers to defend themselves prior to termination</i>	✗
<i>hrm-4-1-2</i>	<i>Legal notice periods</i>	✗
<i>hrm-4-1-3</i>	<i>Termination payments</i>	✗
<i>hrm-4-1-4</i>	<i>Provisions at least as favourable to workers as the law requires</i>	✗
<i>hrm-4-1-5</i>	<i>None of the above</i>	

hrm-5	Does the employer have written grievance handling procedures?	Yes
-------	---	-----

hrm-5-1	Do the grievance handling procedures ensure the following? (SELECT all that apply with an "X")	
<i>hrm-5-1-1</i>	<i>Clear options for submitting grievances</i>	✗
<i>hrm-5-1-2</i>	<i>Anonymity</i>	✗
<i>hrm-5-1-3</i>	<i>Confidentiality as appropriate</i>	✗

<i>hrm-5-1-4</i>	<i>Non-retaliation</i>	✗
<i>hrm-5-1-5</i>	<i>Fair review and appeal process</i>	✗
<i>hrm-5-1-6</i>	<i>Communication of changes made and/or resolution of grievance as appropriate</i>	✗
<i>hrm-5-1-7</i>	<i>None of the above</i>	

hrm-6	Does the employer have written dispute resolution procedures?	No
-------	---	----

hrm-7	Has the employer assigned responsibility in writing to HR staff for following factory HR policies and procedures?	Yes
-------	---	-----

hrm-8	Has the employer assigned accountability in writing to management for following factory policies and procedures relating to employment practices (i.e. contracts etc.) ?	No
-------	--	----

hrm-9	How does the employer communicate and implement HR policies and procedures? (SELECT all that apply with an "X")	
<i>hrm-9-1</i>	<i>Recruitment postings accurately reflect HR policies and procedures, e.g., on wages and working hours</i>	✗
<i>hrm-9-2</i>	<i>The employer provides workers with signed copies of their contracts that reflect HR policies and procedures</i>	✗
<i>hrm-9-3</i>	<i>The employer provides induction training for workers and staff on HR policies and procedures</i>	✗
<i>hrm-9-4</i>	<i>The employer informs trade union and other worker representatives and/or worker-management committees about HR policies and procedures</i>	✗
<i>hrm-9-5</i>	<i>HR policies and internal regulations are posted / easily accessible in facility</i>	✗
<i>hrm-9-6</i>	<i>The employer trains staff on how to carry out HR policies and procedures</i>	✗
<i>hrm-9-7</i>	<i>None of the above</i>	

hrm-10	Does the employer investigate performance under HR policies and procedures to identify weaknesses and make necessary adjustments?	No
--------	---	----

OSH Management

oshm-1	Does the employer have a written OSH policy?	Yes
--------	--	-----

oshm-1-1	Does the OSH policy include a clear commitment to the following? (SELECT all that apply with an "X")	
----------	--	--

<i>oshm-1-1-1</i>	<i>continued improvement aimed at elimination of work-related injury and illness</i>	✗
<i>oshm-1-1-2</i>	<i>compliance with legal requirements pertaining to OSH</i>	✗
<i>oshm-1-1-3</i>	<i>establishing measurable objectives and improvement targets</i>	
<i>oshm-1-1-4</i>	<i>None of the above</i>	

oshm-1-2	Is the OSH policy signed by top management?	Yes
----------	---	-----

oshm-1-3	Was the OSH policy developed in consultation with workers' representatives?	No
----------	---	----

oshm-2	Does the employer have written emergency preparedness procedures?	Yes
--------	---	-----

oshm-2-1	Do the emergency preparedness procedures describe methods for the following? (SELECT all that apply with an "X")	
<i>oshm-2-1-1</i>	<i>reporting fires and other emergencies</i>	✗
<i>oshm-2-1-2</i>	<i>alerting all workers to evacuate</i>	✗
<i>oshm-2-1-3</i>	<i>evacuating workers to designated assembly location</i>	✗
<i>oshm-2-1-4</i>	<i>accounting for all workers after an evacuation</i>	✗
<i>oshm-2-1-5</i>	<i>None of the above</i>	

oshm-3	Does the employer have written hazard/risk management and control procedures?	Yes
--------	---	-----

oshm-3-1	Does the factory's hazard/risk management and control procedure describe methods for the following? (SELECT all that apply with an "X")	
<i>oshm-3-1-1</i>	<i>a systematic approach to identifying hazards</i>	✗
<i>oshm-3-1-2</i>	<i>prioritising risks based on potential impact and likelihood (e.g., risk matrix)</i>	✗
<i>oshm-3-1-3</i>	<i>a hierarchy of controls that is used to select effective controls</i>	
<i>oshm-3-1-4</i>	<i>a risk register that drives the implementation of controls (list of risks, steps that must be taken to address the of risks, dates and owners, etc.)</i>	
<i>oshm-3-1-5</i>	<i>None of the above</i>	

oshm-4	Does the employer have written accident investigation procedures?	No
--------	---	----

oshm-5	Has the employer defined accountability and/or responsibility for OSH issues in writing for OSH officer as well as top management he/she reports to?	Yes
oshm-6	Does the factory have an OSH officer with sufficient time, expertise and authority to perform responsibilities?	Yes
oshm-7	Is there an OSH committee or similar worker/management committee with a mandate to consider OSH issues in the workplace?	Yes
oshm-8	How does the employer communicate and implement OSH policies and procedures? (SELECT all that apply with an "X")	
<i>oshm-8-1</i>	<i>the employer trains workers on OSH policies and procedures relevant to assigned tasks, including during induction</i>	X
<i>oshm-8-2</i>	<i>the employer trains OSH committee members on OSH policies and procedures</i>	X
<i>oshm-8-3</i>	<i>the employer posts the names of the OSH committee members in the workplace</i>	X
<i>oshm-8-4</i>	<i>OSH policies and work instructions are posted and easily accessible in the factory</i>	X
<i>oshm-8-5</i>	<i>the employer informs visitors/ contractors/ service providers about OSH policies and procedures</i>	
<i>oshm-8-6</i>	<i>the employer posts evacuation plans in the workplace</i>	X
<i>oshm-8-7</i>	<i>None of the above</i>	
oshm-9	Does the employer do any of the following to investigate, monitor and measure OSH issues to identify root causes and make necessary adjustments to prevent recurrence? (SELECT all that apply with an "X")	
<i>oshm-9-1</i>	<i>investigate, monitor and measure OSH issues</i>	X
<i>oshm-9-2</i>	<i>conduct regular OSH tests, surveys and inspections (e.g. testing quality of drinking water or air testing in footwear factories)</i>	X
<i>oshm-9-3</i>	<i>log violations of OSH procedures</i>	
<i>oshm-9-4</i>	<i>analyse violations of OSH procedures</i>	
<i>oshm-9-5</i>	<i>regularly review the effectiveness of OSH management systems, including performance on measurable objectives and targets</i>	
<i>oshm-9-6</i>	<i>change procedures/ practices where required based on accident investigations</i>	
<i>oshm-9-7</i>	<i>None of the above</i>	

Overview of Non-Compliance

The following is an overview of the areas of non-compliance found in the factory during the assessment visit. It is based on the compliance assessment tool.

Working Conditions

Compensation

Fact-Gathering Questions

Wage slips [subject to public reporting] (Ref 11529)

Paid Leave

Payment for maternity leave [subject to public reporting] (Ref 18382)

Wage Information, Use and Deduction

Payroll records (Ref 12385)

Contracts and Human Resources

Contracting Procedures

Service book for workers (Ref 12985)

Non-compliance with legal requirements for compensation, contracts, OSH, and/or working time pertaining to non-production workers and/or sub-contracted workers (Ref 18339)

Dialogue, Discipline and Disputes

Factory Participation Committee [subject to public reporting] (Ref 18365)

Employment Contracts

Workers' understanding of the terms and conditions of employment. (Ref 11549)

Occupational Safety and Health

Number of first aid boxes/supplies in the workplace (Ref 12420)

Chemicals and Hazardous Substances

Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances (Ref 11536)

Chemical safety data sheets for all chemicals and hazardous substances in the workplace (Ref 12967)

Storage of chemicals and hazardous substances [subject to public reporting] (Ref 12410)

Labelling of chemicals and hazardous substances (Ref 18246)

Training workers who work with chemicals and hazardous substances (Ref 11535)

Noncompliance with legal requirements regarding Chemicals and Hazardous Substances

Emergency Preparedness

Fire fighting equipment (Ref 13301)

Forming teams and/or training workers on fire fighting and rescue (Ref 18255)

Accessible, unobstructed, and/or unlocked emergency exits and escape routes during working hours, including overtime [subject to public reporting] (Ref 9174)

Storage of flammable materials (Ref 11570)

Health Services and First Aid

Medical checks for workers (Ref 11559)

Onsite medical facilities and staff (Ref 12458)

OSH Management Systems

Safety Committee (Ref 18242)

Worker Protection

Providing workers with personal protective clothing and equipment (Ref 9153)

Training and encouragement of workers to use PPE, machines and/or equipment safely (Ref 13289)
--

Ergonomic requirements (Ref 11542)

Grounding machinery and equipment (Ref 13290)

Information and education on HIV/AIDS (Ref 9162)
--

Working Time

Overtime

Limits on daily overtime hours worked (Ref 18280)

Limits on weekly overtime hours worked (Ref 18280)
--

Detailed Non-Compliance Findings

The following section presents the non-compliance findings recorded by the Enterprise Advisors during the assessment visit.

Working Conditions

Compensation

Fact-Gathering Questions

Issue	Wage slips [subject to public reporting] (Ref 11529)
Question	Are workers informed about their individual wages and deductions in line with legal requirements (e.g. through pay slips)?
Finding	<p>Document review and workers and management interviews indicated that the employer-provided wage slips to the workers, which did not reflect the workers' actual monthly earnings. The management provided wage slips did not include earnings of staff holiday allowance for working on the weekends to the eligible workers. For example, an assistant electrician was paid BDT 200 for working on 17 November 2023 (weekend) but the payment was not reflected in the pay slip.</p> <p>Management acknowledged this issue.</p> <p>Document checked: Payrolls and wage slips for the month of April 2023, November 2023 and March 2024.</p>
Legal Reference	ILO Convention 95, Art. 14; Rules 111(3, 6(b)), Form 38, BLR

Paid Leave

Issue	Payment for maternity leave [subject to public reporting] (Ref 18382)
Question	Which of the following types of leave is the facility not correctly paying workers for, as legally required? (SELECT all that apply with a "X") - Maternity leave
Finding	<p>Document review and interviews with the workers and management indicated that the enterprise did not calculate maternity benefit as per law for the eligible workers. The management did not consider payment of earned leave while calculating maternity benefit. For example, a worker was on maternity leave from 26 October 2023 to 14 February 2024. The worker applied for maternity benefits on 25 October 2023, who received payment for unused earned leave of BDT 7,421 (paid in the month of September 2023) was not considered in calculating the total earnings of the worker in the immediate last month (September 2023). Management calculated BDT 11,681 (September wage BDT 11,131 + Attendance bonus BDT 550) as the total earnings of last month instead of BDT 19,102 (September wage BDT 11,131 + Attendance bonus BDT 550 + Earned leave payment BDT 7,421). Thus, the worker received BDT 50,318 in two installments instead of BDT 82,286.</p> <p>However, the enterprise had paid maternity benefits to 106 workers in the last 12 months. During the assessment on 28-29 April 2024, there were 22 workers on maternity leave.</p> <p>Document checked: 05 maternity workers' personnel files and maternity leave register.</p>
Legal Reference	Sections 45-49, BLA; Rules 38, 39, Forms 18, 18A, and 19, BLR

Wage Information, Use and Deduction

Issue	Payroll records (Ref 12385)
Question	Does the facility maintain only one accurate payroll record?
Finding	<p>Document review and management and worker interviews indicated that the enterprise maintained more than one set of payrolls. 02 separate sets of records were identified, which indicated:</p> <ul style="list-style-type: none">- First set of payroll reflected payments of regular wages and overtime hours; and- Second set reflected the payment of holiday allowance for weekend work. <p>However, the first set of payroll records contained required information such as worker ID number, name, designation and date of joining, grade, basic wage, payment of house rent, transportation, medical allowance, food, gross wages, attendance bonus, overtime rate and amount, deduction and worker's signatures.</p> <p>Document checked: Payrolls and time records for the months of April 2023, November 2023, and March 2024.</p>
Legal Reference	Rule 111(1), Form 38, BLR

Contracts and Human Resources

Contracting Procedures

Issue	Service book for workers (Ref 12985)
Question	Bangladesh: Do all workers (other than apprentices, substitute/badli or casual workers) have a service book as legally required?
Finding	<p>Document review and management interview confirmed that the employer had maintained service books for the workers but 03 out of 07 reviewed service books were not updated with the information of wages and allowance for the year of 2023 and all 07 out of 07 service books did not contain any information on annual leave-related records of the workers.</p> <p>Document checked: Personnel files, and service books of 07 workers.</p>
Legal Reference	Sections 6-8, BLA; Rules 20-22, BLR

Issue	Non-compliance with legal requirements for compensation, contracts, OSH, and/or working time pertaining to non-production workers and/or sub-contracted workers (Ref 18339)
Question	Is the facility in non-compliance with any legal requirements for Contracts and Hiring Practices pertaining to non-production workers and/or sub-contracted workers?
Finding	<p>The appointment letter issued to the nurse did not include the following:</p> <ul style="list-style-type: none">- Festival bonus.- Increment rate.- Any clause stating all the conditions of the employment will be administered by the service rules of the company (if any) and existing labour law.

	Document checked: appointment letters of nurses.
Legal Reference	Sections 2(Lxv), 3a, 5, 121, BLA; Rules 7(1), 8, 16, 17, BLR
Issue	Non-compliance with legal requirements for compensation, contracts, OSH, and/or working time pertaining to non-production workers and/or sub-contracted workers (Ref 18339)
Question	Is the facility in non-compliance with any legal requirements for Working Hours pertaining to non-production workers and/or sub-contracted workers?
Finding	<p>Document review and interviews with workers and management indicated that the employer did not comply with limits on overtime hours worked for the non-production workers, such as store section workers. The following overtime hours were noted to be in excess of the legal limit:</p> <p>In April 2023</p> <p>In the store section: maximum 10 OT hours (total 18 hours) in a day, 40 hours (total 88 hours) in a week</p> <p>In November 2023</p> <p>In the store section: maximum 07 OT hours (total 15 hours) in a day, 38 hours (total 86 hours) in a week</p> <p>In March 2024</p> <p>In the store section: maximum 05 OT hours (total 13 hours) in a day, 28 hours (total 76 hours) in a week</p> <p>Document checked: Time records of April 2023, November 2023 and March 2024.</p>
Legal Reference	Sections 2(Lxv), 3a, 5, 121, BLA; Rules 7(1), 8, 16, BLR

Dialogue, Discipline and Disputes

Issue	Factory Participation Committee [subject to public reporting] (Ref 18365)
	Are there any legally required bipartite committee(s) in place at the facility?
Question	Are bipartite committee(s) established and functioning in line with legal requirements?
Finding	<p>Document review and worker and management interviews indicated that the enterprise formed a Participation Committee (PC) on 23 October 2023 through an election held on 19 October 2023. The Committee consists of a total of 22 members, which include 05 management representatives (01 female and 04 male) and 17 workers representatives (11 female and 06 male).</p> <ul style="list-style-type: none"> - Election: The Election Conduction Committee was formed with 05 members (01 from management and 04 from workers). The election was conducted through secret ballots. - Nomination process: Candidates were nominated by their co-workers following the legal framework.

	<p>- Meeting and Minutes: The participation Committee conducted meetings at least once every two months. The last meeting was held on 24 March 2024 and the minute was posted on the notice board. Meeting minutes were sent to the Director of Labour within 7 days of the meeting.</p> <p>However, the Participation Committee did not meet the following requirements:</p> <p>- Roles and responsibilities: Interviewed 03 out of 08 PC worker representatives were not aware of the provisions of law applicable to their job. Management and worker interviews indicated that PC members were provided training on the roles, responsibilities, and limitations of the worker representatives.</p> <p>- Communication: 04 out of 10 of the interviewed workers did not have any knowledge about the activities of the Participation Committee.</p>
Legal Reference	ILO Convention 135; Sections 205-208, BLA; Rules 183-201, BLR

Employment Contracts

Issue	Workers' understanding of the terms and conditions of employment. (Ref 11549)
Question	Do workers understand the terms and conditions included within their written employment contracts?
Finding	<p>The terms and conditions of employment such as paid leave, compensation for leave, maternity benefits, job separation procedures, and termination payments were unclear to approximately 40% (04 out of 10) of the interviewed workers. Management stated that they regularly conducted induction training for newly recruited workers and shared the corresponding training records.</p> <p>Management had posted the approved working hours on the factory notice boards.</p>
Legal Reference	Sections 5, 111 BLA; Rule 19, BLR

Occupational Safety and Health

Issue	Number of first aid boxes/supplies in the workplace (Ref 12420)
Question	Does the facility comply with legal requirements for any of the following related to first aid? (SELECT all that apply with a "X") - First-aid kits are sufficient in number
Finding	<p>During the floor visit, assessors noted the following issue regarding first aid boxes in the workplace:</p> <p>- the first aid boxes in cutting, sewing, and finishing sections (throughout the facility) did not include eye ointment, a tourniquet, oral saline, wooden sticks to set broken bones.</p>
Legal Reference	ILO Convention 155; Section 89, BLA; Rule 76, BLR

Chemicals and Hazardous Substances

Issue	Assessing, monitoring, preventing and/or limiting workers' exposure to hazardous substances (Ref 11536)
-------	---

Question	Has all legally required action been taken to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances?
Finding	Floor visits and interviews with the workers and management indicated that the enterprise did not take proper steps to assess, monitor, prevent and limit workers' exposure to chemicals and hazardous substances. For example: chemicals and hazardous substances such as lubricant (Diesel), and solvent cleaner was being used without assessing the risks associated with the chemicals and planning for alternatives for high-risk chemicals.
Legal Reference	ILO Convention 170; Recommendations 97, 177; Sections 53, 78, BLA; Rules 46, 80(b), BLR
Issue	Chemical safety data sheets for all chemicals and hazardous substances in the workplace (Ref 12967)
Question	Are Safety Data Sheets ("SDS", formerly MSDS) available for all chemicals used in the workplace in line with legal requirements?
Finding	Floor visit, interviews with the management and workers indicated that the employer did not post any supplier provided original Safety Data Sheet (SDS) in local language and for chemicals and hazardous substances, such as, a huge quantity (approximately 1800 liters) of lubricant (Diesel), and solvent cleaner (approximately 1000 liters) drums (each drum contains 200 liters) were stored on the road passage under the open sky.
Legal Reference	ILO Convention 170; Rule 68(10), BLR
Issue	Storage of chemicals and hazardous substances [subject to public reporting] (Ref 12410)
Question	Are chemicals and hazardous substances stored in line with legal requirements?
Finding	During the plant tour, interviews with workers and management indicated that there was no secondary containment for the chemical and hazardous substances. For example, a huge quantity (approximately 1800 liters) of lubricant (Diesel), and solvent cleaner (approximately 1000 liters) drums (each drum contains 200 liters) were stored on the road passage under the open sky without secondary containment.
Legal Reference	Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Section 2.8.1; Rule 21, Acid Rules (2004)
Issue	Labelling of chemicals and hazardous substances (Ref 18246)
Question	Are chemicals and hazardous substances labeled in line with legal requirements?
Finding	Floor visits and management and worker interviews indicated that the employer did not provide labels in the local language as per the globally harmonized system (GHS) for the chemicals and hazardous substances used in the enterprise. For example, a huge quantity (approximately 1800 liters) of lubricant (Diesel), and solvent cleaner (approximately 1000 liters) drums (each drum contains 200 liters) were stored on the road passage under the open sky without label including product name or identifiers, signal word, hazard pictograms, hazard statements, precautionary statements, and manufacturer information in the local language.
Legal Reference	ILO Convention 170; Recommendation 177; Rule 33, Acid Rules (2004)

Issue	Training workers who work with chemicals and hazardous substances (Ref 11535)
Question	Are workers trained on chemical hazards and safe work practices particular to their job assignment in line with legal requirements?
Finding	Training records indicated that management had provided training to workers and employees who worked with chemicals and hazardous substances. However, during the floor visits, assessors noted that approximately 80% of the interviewed workers used or handled lubricant (Diesel), and solvent cleaner appeared to have minimal awareness of how to safely handle those chemicals and hazardous substances, following safety precautions and use of appropriate PPE.
Legal Reference	ILO Convention 170; Section 78A(3), BLA; Rules 67(2), 85, Schedule IV, BLR

Issue	Noncompliance with legal requirements regarding Chemicals and Hazardous Substances
Question	Are facility practices out of compliance with any legal requirements not covered elsewhere regarding Chemicals and Hazardous Substances?
Finding	Factory visits, document review, and management interviews indicated that the facility management did not take any storage license for storing over the limit of petroleum (diesel fuel) than allowed (2000 liters in the license) by the concerned government authority. The facility stored approximately 3500 liters in drums (200 liters each) and generator tanks (in-built).
Legal Reference	None

Emergency Preparedness

Issue	Fire fighting equipment (Ref 13301)
Question	Does the facility have legally required fire fighting equipment?
Finding	During the floor visit, it was observed that: <ul style="list-style-type: none"> - at least 02 (two) fire extinguishers in the finished goods warehouse located at the basement floor of the 06 storied production building were blocked by the finished goods cartons; - at least 01 (one) fire alarm switch in the finished goods warehouse located at the basement floor of the 06 storied production building was blocked by the finished goods cartons.
Legal Reference	Section 62(1), BLA; Rule 55(1-7, 15-17), BLR; Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Sections 2.8.1, 3.5

Issue	Forming teams and/or training workers on fire fighting and rescue (Ref 18255)
Question	Has the facility trained workers to use fire-fighting equipment in line with legal requirements?
Finding	Document review and management and worker interviews indicated that only 07% (240 workers) instead of the required 18% (675) of total workers received training from the Fire Service and Civil Défense. However, the facility has provided relevant training to approximately 400 workers through the Bangladesh Garment Manufacturers and Exporters Association (BGMEA).
Legal Reference	Section 62, BLA; Rule 55(10-12), BLR

Issue	Accessible, unobstructed, and/or unlocked emergency exits and escape routes during working hours, including overtime [subject to public reporting] (Ref 9174)
Question	Are all emergency exits accessible, unobstructed and unlocked during working hours (including overtime) and lead to a place of safety?
Finding	<p>During the floor visit, assessors observed that;</p> <ul style="list-style-type: none"> - at least 30% of the visited workers in the sewing section located at 3rd floor to 5th floor of the 06 storied production building and, ground and 1st floor of 02 storied production building were blocked by machines, working tables, co-workers, fabric sacks and goods. At least 10% of the visited workers in the cutting section at basement floor, 3rd floor, and 5th floor of the 06 storied production building were blocked by pillars, tables and fabric sacks. At least 20% of the visited workers in the finishing section and at least 10% of the visited workers in the packing section at the 3rd floor to 5th floor of the 06 storied production building were blocked by pillars, tables, machines, and co-workers. - at least 02 evacuation aisles in the cutting section located at basement floor, 3rd floor, and 5th floor of the 06 storied production building was partially blocked by fabric sacks and working tables. At least 03 evacuation aisles in the sewing section located at the 3rd floor to 5th floor of the 06 storied production building was partially blocked by fabric sacks and goods, machines, working tables, and co-workers; at least 03 evacuation aisles in the lunchroom and canteen located at 5th floor of the 06 storied production building were blocked by finished goods cartons; and - at least 06 emergency exit doors located at 3rd floor to 5th floor of the 06 storied production building was partially blocked by finished goods cartons, idle machines, and empty cartons. <p>Management acknowledged the issue.</p>
Legal Reference	Sections 62(3, 6), 72, BLA; Rules 54, 59, BLR; Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Sections 2.9.2, 2.9.5

Issue	Storage of flammable materials (Ref 11570)
Question	Are flammable/combustible materials safely stored?
Finding	During the factory visit, it was observed that flammable materials such as empty cartons and finished goods cartons were improperly stored beneath the stairwells at 3rd floor to 5th floor located at 06 storied production building.
Legal Reference	Sections 72(c), 78, BLA; ILO, Fire Risk Management (2012)

Health Services and First Aid

Issue	Medical checks for workers (Ref 11559)
Question	Are health checks of workers conducted in line with legal requirements?
Finding	Document review and interviews indicated that the enterprise did not arrange the required annual medical checks for 40 out of 42 printing workers. The last health checkup was done on 02 March 2024 for printing operators, boiler and generator operators, and electricians.
Legal Reference	ILO Convention 148; Recommendations 156, 177; Section 79(c), BLA; Rules 68(1, 4, 5-8), BLR

Issue	Onsite medical facilities and staff (Ref 12458)
Question	Are on-site medical facilities/clinic(s) and staff in line with legal requirements?
Finding	<p>Floor visits, document review, interviews with workers, and management indicated that the enterprise had a medical facility for 3751 workers. However, the medical facility did not meet the following requirements:</p> <ul style="list-style-type: none"> - factory appointed 01 nurse instead of 02. Moreover, the nurse didn't have the required qualifications (diploma in nursing). - factory appointed 01 part-time doctor available from 10:00 am to 01:00 pm instead of 02 full-time doctors. - 01 trained medical assistant was appointed instead of 02. - Insufficient equipment in the medical room, for example: <ul style="list-style-type: none"> (a) arrangement of disinfecting equipment. (b) no supply of serum that is preventive of Tetanus. <p>However, the enterprise had an agreement with a local hospital where it was mentioned that the factory will pay all the service charges (treatment & diagnosis) and medicine costs officially for individual employees after submitting the bills/invoices from the hospital.</p>
Legal Reference	Section 89, BLA; Rules 77, 78, BLR

OSH Management Systems

Issue	Safety Committee (Ref 18242)
Question	Is the OSH Committee formed and functioning in line with legal requirements?
Finding	<p>Document review and interviews with workers and management indicated that the factory had established a Safety Committee on 16 November 2023. The workers' representatives of the safety committee were nominated by the workers' representatives of the participation committee.</p> <p>Total members: 12 (female - 05, male - 07), Management: 06 (female - 01, male - 05), Workers: 06 (female - 04, male - 02).</p> <p>Meeting: Meetings were held at least once every 03 (three) months. The last meeting was held on 15 February 2024. Minutes were preserved after the meetings. The last meeting minute was posted on the notice board.</p> <p>Training: Management arranged internal and external training for the members of the safety committee on safety issues.</p> <p>However, the safety committee didn't meet the below:</p> <ul style="list-style-type: none"> - 03 out of 06 of the interviewed members of the safety committee (workers' representatives) were not adequately aware of their roles and responsibilities. <p>In addition, the workers' representatives of the safety committee were not adequately aware and engaged with the following areas according to the law:</p> <ul style="list-style-type: none"> - support the formation of the firefighting and emergency rescue teams and organize evacuation drills. - make recommendations on compensation for workplace accidents.

	<ul style="list-style-type: none"> - identify OSH risks according to OSH checklist. - organize OSH training for the worker. - organize initiatives for safe workplace day.
Legal Reference	ILO Convention 155 and Recommendation 164; Section 90(a), BLA; Rules 81-85, Schedule IV, BLR

Worker Protection

Issue	Providing workers with personal protective clothing and equipment (Ref 9153)
Question	Are workers provided with Personal Protective Equipment (PPE) in line with legal requirements?
Finding	<p>Floor visit, document review, worker and management interviews indicated that the enterprise did not provide necessary personal protective equipment (PPE) to all workers. For example:</p> <ul style="list-style-type: none"> - appropriate dust masks were not provided to cutter man in the cutting section and overlock machine operators in the sewing section. The mentioned workers were only provided with fabric masks and one-time disposable masks, which were inadequate to protect against dust. <p>However, management provided:</p> <ul style="list-style-type: none"> - metal hand gloves to workers in the cutting section. - ear plugs/muffs to workers in the compression machine/boiler/generator sections. - respiratory masks and hand gloves to workers in the spot removing room. <p>Document checked: PPE register.</p>
Legal Reference	ILO Recommendation 97; Section 78(a) BLA; Rules 46, 67, BLR

Issue	Training and encouragement of workers to use PPE, machines and/or equipment safely (Ref 13289)
Question	Are workers trained and encouraged to use personal protective equipment in line with legal requirements?
Finding	<p>Document review and interviews indicated that workers were provided orientation and awareness training on using PPE and safety equipment after recruitment. However, during the floor visit, assessors observed that the provided training was not effective enough to encourage workers to use the safety equipment properly. For example;</p> <ul style="list-style-type: none"> - approximately 40% of the observed over-lock machine operators in the sewing section were not using provided functional eye guards; - approximately 60% of the observed sewing machine operators were using the provided needle guards at an inappropriate height, which could not protect them from injury/accidents; - approximately 60% of the observed snap button machines did not have finger guards.
Legal Reference	ILO Recommendation 97; Section 78A BLA; Rules 57, 67, BLR

Issue	Ergonomic requirements (Ref 11542)
Question	Are ergonomic measures in line with legal requirements?

Finding	<p>During the floor tour, assessors observed that the employer did not comply with ergonomic requirements, as follows:</p> <ul style="list-style-type: none"> - at least 04 workers on the 3rd floor packing area were working sitting on the floor. - chairs provided to seated workers (all sewing operators) in the sewing section located in production building-02 (steel structured) did not have backrests. However, chairs with backrest support provided to the machine operators in others production buildings. - long standing workers in the cutting, finishing, quality, and packing section were not provided chairs or seating arrangements nearby to sit down at regular intervals. As a result, cutting operators were working sitting on the cutting table.
Legal Reference	ILO Recommendation 102; Section 74 BLA; Rule 63, BLR; Ergonomic Checkpoints: Practical and easy-to-implement solutions for improving safety, health and working conditions. 2d ed. ILO 2010, Checkpoints 6, 9, 54, 58, 59

Issue	Grounding machinery and equipment (Ref 13290)
Question	Is all of the machinery equipment grounded in line with legal requirements (including production equipment, compressors, transformer, generator, etc.)?
Finding	Assessors noted through document review and management interview that the electrical systems, including grounding and wiring were not inspected and certified by a licensed wiring inspector or institute once every 24 months.
Legal Reference	Rule 58 (1, 3, 7, 8), BLR; Chapters V & VI, Rule 57, Electricity Rules, 1937; Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh 4.9.1; Ergonomic Checkpoints: Practical and easy-to-implement solutions for improving safety, health and working conditions. 2d ed. ILO 2010, Checkpoint 90

Issue	Information and education on HIV/AIDS (Ref 9162)
Question	Does the facility comply with occupational safety and health-related legal requirements on HIV/AIDS?
Finding	Training records and management interviews indicated that the enterprise had trained approximately 21% of workers (772 workers) on HIV/AIDS instead of 100%. However, approximately 50% of the interviewed workers were unaware of information about HIV/AIDS-related risk reduction in their personal lives.
Legal Reference	National Policy on HIV/AIDS and STD Related Issues, Section 11

Working Time

Overtime

Issue	Limits on daily overtime hours worked (Ref 18280)
Question	Which legal overtime limits are not being complied with? (SELECT all that apply with a "X") - Daily limits on overtime hours worked

Finding	<p>Document review, and interview with workers and management indicated that the employer did not comply with daily limits on overtime hours. The following overtime hours were noted to be more than the legal limit of daily 12 hours (08 regular hours and 04 OT hours) as mentioned in circular nos. 40.00.0000.016.30.008.17.111, 40.00.0000.016.30.008.17.118 and 40.00.0000.016.30.008.17.198 issued by the Wage Board Branch, Ministry of Labour and Employment on 6 November 2022, 17 May 2023 and 8 October 2023 respectively:</p> <p>In March 2024</p> <p>In the Cutting section: maximum 05 OT hours (total 13 hours) in a day. In the Sewing section: maximum 05 OT hours (total 13 hours) in a day. In the Finishing section: maximum of 05 OT hours (total 13 hours) in a day. In the Printing section: maximum 07 OT hours (total 15 hours) in a day. In the Embroidery section: maximum 06 OT hours (total 14 hours) in a day.</p> <p>In November 2023</p> <p>In the Cutting section: maximum 05 OT hours (total 13 hours) in a day. In the Sewing section: maximum 13 OT hours (total 21 hours) in a day. In the Finishing section: maximum of 05 OT hours (total 13 hours) in a day. In the Printing section: maximum 05 OT hours (total 13 hours) in a day. In the Embroidery section: maximum 05 OT hours (total 13 hours) in a day.</p> <p>In April 2023</p> <p>In the Cutting section: maximum 04 OT hours (total 12 hours) in a day. In the Sewing section: maximum 04 OT hours (total 12 hours) in a day. In the Finishing section: maximum of 07 OT hours (total 15 hours) in a day. In the Printing section: maximum 04 OT hours (total 12 hours) in a day. In the Embroidery section: maximum 04 OT hours (total 12 hours) in a day.</p> <p>Document checked: Payrolls and job cards for April 2023, November 2023, and March 2024.</p>
Legal Reference	Sections 2(66), 100, 102, BLA; Rule 99(1), BLR
Issue	Limits on weekly overtime hours worked (Ref 18280)
Question	Which legal overtime limits are not being complied with? (SELECT all that apply with a "X") - Weekly limits on overtime hours worked
Finding	<p>Document review, and interview with workers and management indicated that the employer did not comply with weekly limits on overtime hours. The following overtime hours were noted to be more than the legal limit of weekly 72 hours as mentioned in circular nos. 40.00.0000.016.30.008.17.111, 40.00.0000.016.30.008.17.118 and 40.00.0000.016.30.008.17.198 issued by the Wage Board Branch, Ministry of Labour and Employment on 6 November 2022, 17 May 2023 and 8 October 2023 respectively:</p> <p>In March 2024</p> <p>In the Cutting section: maximum 28 OT hours (total 76 hours) in a week. In the Sewing section: maximum 26 OT hours (total 74 hours) in a week. In the Finishing section: maximum of 30 OT hours (total 78 hours) in a week.</p>

In the Printing section: maximum 30 OT hours (total 78 hours) in a week.

In the Embroidery section: maximum 29 OT hours (total 77 hours) in a week.

In November 2023

In the Cutting section: maximum 35 OT hours (total 83 hours) in a week.

In the Sewing section: maximum 36 OT hours (total 84 hours) in a week.

In the Finishing section: maximum of 36 OT hours (total 84 hours) in a week.

In the Printing section: maximum 20 OT hours (total 68 hours) in a week.

In the Embroidery section: maximum 18 OT hours (total 66 hours) in a week.

In April 2023

In the Cutting section: maximum 24 OT hours (total 72 hours) in a week.

In the Sewing section: maximum 24 OT hours (total 72 hours) in a week.

In the Finishing section: maximum of 29 OT hours (total 77 hours) in a week.

In the Printing section: maximum 16 OT hours (total 64 hours) in a week.

In the Embroidery section: maximum 24 OT hours (total 72 hours) in a week.

Document checked: Payrolls and job cards for April 2023, November 2023, and March 2024.

Legal Reference

Sections 2(66), 100, 102, BLA; Rule 99(1), BLR

Additional Information

This section of the report contains additional information provided by the Enterprise Advisors on areas NOT found to be in non-compliance, including on certain issues that require findings in all assessments regardless of their compliance status.

Child Labour

Child Labourers

Question	Are any workers under the legal minimum age for employment? (Ref 18388)
Finding	Based on observations, interviews with workers, and employment records review, assessors found no indication that management employed workers under the age of 14. Management stated that the hired workers were at least 18 years old. Document checked: HR records for 10 workers.
Legal Reference	ILO Convention 138; Sections 2(Lxiii), 34(1), BLA

Documentation and Protection of Young Workers

Question	Does the facility verify minimum age requirements prior to hiring workers? (Ref 9003)
Legal Reference	ILO Convention 138; Recommendation 146; Section 36, BLA; Rule 34 and Form 15, BLR
<p>If yes, please describe what legal documentation or other proof of age are reviewed to verify minimum age requirements and whether copies are maintained: Document review, interviews with workers, and management indicated that management required workers to provide the following original document to verify their age prior to hiring: a national identification card, birth registration certificate, school certificate, or certificate from a registered physician certifying the age of the person concerned. The in-house doctor examines workers' physical appearance, teeth for female workers, and facial hair for male workers to confirm their age and fitness for the job. These practices were confirmed through document, and management and worker interviews.</p> <p>Document checked: HR records for 10 workers.</p>	

Freedom of Association and Collective Bargaining

Freedom to Associate

Question	Are workers free to form a trade union of their choosing? (Ref 18371)
Finding	Worker interviews indicated that workers were not aware of the role of unions and their activities. Workers had not taken any initiative to associate or form a union. Assessors did not find evidence during the assessment to indicate that factory management was opposed to workers exercising their Freedom of Association (FoA) rights. The enterprise had a FoA policy, and the policy was posted on the notice board.
Legal Reference	ILO Convention 87; Sections 176(a), 179, 183, 190, 193, BLA; Rules 167, 176, and Forms 55(A), 61(A), BLR

Question	Are workers free to join a trade union of their choosing? (Ref 18371)
Finding	Worker interviews indicated that workers were not aware of the role of unions and their activities. Workers had not taken any initiative to associate or form a union. Assessors did not find evidence during the assessment to indicate that factory management was opposed to workers exercising their Freedom of Association (FoA) rights. The enterprise had a FoA policy, and the policy was posted on the notice board.
Legal Reference	ILO Convention 87; Sections 176(a), 179, 183, 190, 193, BLA; Rules 167, 176, and Forms 55(A), 61(A), BLR

Compensation

Minimum Wages/Piece Rate Wages

Question	Do full-time production workers receive AT LEAST the legal minimum wage (and/or wage required by contract, CBA, or other agreement) for all regular hours worked? (Ref 18207)
Finding	Document review and interviews with workers and management indicated that the management paid regular permanent workers in accordance with the Minimum Wage Gazette 2023 considering the worker's designation and grade (for ordinary hours of work). Management paid regular permanent workers in accordance with the individually negotiated amount based on the appointment letter and not less than the minimum wage circular. Workers confirmed that they received the amounts shown in the payroll. Document checked: Payrolls for April 2023, November 2023, and March 2023.
Legal Reference	Sections 148, 149, BLA; Rule 133(1), BLR; Minimum Wage Gazette for RMG Sector, December 2018; Minimum Wage Gazette for Cotton Textile Sector. May 2018.

Contracts and Human Resources

Employment Contracts

Question	Do all persons who perform work for the facility, both on the premises and offsite, have a contract? (Ref 9062)
Finding	All workers who worked for the factory had a letter of appointment. Workers were hired on a probationary basis for 03 months at the start of their undetermined duration letter of appointment. Regular workers were employed under an undetermined duration letter of appointment. All worker's employment contracts were written. Management provided all workers with a copy of their letter of appointment. Interviewed 07 workers confirmed they received an appointment letter on the day of joining. Document checked: HR records for 10 workers. Interviewed 07 workers.
Legal Reference	Section 5, BLA; Rule 19, BLR

Occupational Safety and Health

Emergency Preparedness

Question	Does the facility conduct regular emergency drills for all workers in line with legal requirements? (Ref 18256)
Finding	Management conducted periodic emergency drills for all workers at least once every six months and the last three emergency drills were held on 25 March 2024, 25 December 2023 and 23 April 2024 (night drill). Workers also confirmed that they knew how to react in case of an emergency. Document checked: Emergency drill records of 2023 and 2024.
Legal Reference	Section 62(7, 8), BLA; Rule 55(14), BLR; Guidelines for Assessment of Fire and Electrical Safety of Existing RMG Factory Buildings in Bangladesh, Section 3.8

OSH Management Systems

Question	Does the facility have an occupational safety and health (OSH) committee? (Ref 18242)
Legal Reference	ILO Convention 155 and Recommendation 164; Section 90(a), BLA; Rules 81-85, Schedule IV, BLR
How many union representatives are in the OSH committee?	0
How many employer members are in the OSH committee?	6
How many female members are in the OSH committee?	5
How many worker members are in the OSH committee?	6
How many members are in the OSH committee?	12

Working Time

Regular Hours

Question	Do regular working hours exceed legal requirements? (Ref 9001)
Finding	Document review and interviews with workers and management indicated that regular working hours did not exceed 8 hours per day, 6 days per week (48 hours). Regular working hours for the Cutting, Sewing, and Finishing section were 8:00 am to 5:00 pm, and for the Embroidery and Printing section 08:00 am to 05:00 pm and 08:00 pm to 05:00 am with a one-hour break. The factory had three shifts of work for the security department (06:00 am to 02:00 pm, 02:00 am to 10:00 pm, and 10:00 pm to 6:00 am). Regular working days are from Saturday to Thursday. Friday is the weekend. Document checked: Working hour approval, job card records for April 2023, November 2023, and March 2024.
Legal Reference	Sections 100, 102, BLA; Rule 99(1), BLR

Number of regular weekly hours worked at the facility: **48**

Number of regular daily hours worked at the facility: **8**

Question	Are the weekly rest days provided by the facility in line with legal requirements? (Ref 9013)
----------	---

Legal Reference	Section 103, BLA; Rule 100, BLR
-----------------	---------------------------------

Number of weekly rest days provided by the facility: **1**

Are weekly rest days at least 24 consecutive hours long? (Ref 9013) **Yes**

Better Work Clusters and Compliance Points

Better Work carries out factory assessments to monitor compliance with international core labour standards and national labour law, and where national law either fails to address or lacks clarity around a relevant issue regarding conditions at work, according to benchmarks established by Better Work based on international labour standards and good practices. Better Work organizes reporting into eight areas of labour standards, also known as clusters. Four of the clusters are international core labour standards, based on fundamental rights at work and four are based on national labour law relating to working conditions. As such, factory assessments aim to monitor compliance with these areas.

Core labour standards: Adopted in 1998, the ILO Declaration on Fundamental Principles and Rights at Work commits Member States to respect and promote principles and rights in four categories, whether or not they have ratified the relevant Conventions. These categories are: freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation. The relevant ILO Conventions from which the 1998 Declaration derives—29, 87, 98, 105, 100, 111, 138, and 182—provide the framework for assessing non-compliance in the core labour standards clusters across all Better Work country programmes.

National labour law: The four other clusters monitor compliance with standards primarily set by national law, so they vary from country to country. This set consists of compensation, contracts and human resources, occupational safety and health, and working time.

Each of the eight clusters is divided into its key components, known as "compliance points". Each of these compliance points contains specific questions that may vary from country to country. Better Work's Global Compliance Assessment Tool (CAT) is available at <https://betterwork.org/blog/portfolio/better-works-global-compliance-assessment-tool/>