

CAMBODIA Annual Report

An Industry and Compliance Overview for 2022-2023



International Labour Organization



Creating Markets, Creating Opportunities

Acknowledgements

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¹ For the reporting period 2022-2023.

² Ibid.

ANNUAL REPORT: AN INDUSTRY AND COMPLIANCE OVERVIEW FOR 2022-2023 - BETTER FACTORIES CAMBODIA

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List of abbreviations

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BFC	Better Factories Cambodia
CAT	Compliance Assessment Tool
CBA	Collective Bargaining Agreement
GBVH	Gender-based violence and harassment
GEAR	Gender Equality and Returns
GFT	Garment, Footwear and Travel Goods
HRDD	Human Rights Due Diligence
IFC	International Finance Corporation
ILO	International Labour Organization
LDC	Least Developed Country
MLVT	Ministry of Labour and Vocational Training
OSH	Occupational Safety and Health
PPE	Personal Protective Equipment
TAFTAC	Textile, Apparel, Footwear and Travel Goods Association in Cambodia



Summary Findings

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This report presents findings and observations from Better Factories Cambodia's engagement with the garment, footwear and travel goods (GFT) sector. The Annual Report 2022-23 provides a compliance overview of garment sector, which holds significant importance to the country's economy and employment. The report primarily draws from enterprise assessment findings from unannounced compliance visits to 316 factories in 2022 and 364 factories in 2023. It presents a snapshot of non-compliance rates related to fundamental rights at work and working conditions in the garment industry. The following are highlights from each compliance cluster.

Core Labour Standards

Child Labour: Child labour is one of the zero tolerance issues that BFC monitors in its enrolled factories. BFC found one factory employing two workers under the age of 15 in 2023. The case was immediately investigated and reported. The two underage workers were rehabilitated into school with cooperation from the employer. According to the data, there were no reported cases of non-compliance relating to child labour in the factories that were assessed in 2022.

Discrimination: Overall, documented non-compliance under this cluster is low. Similar to previous years, the majority of non-compliance cases under this cluster related to discrimination on the grounds of gender.

Forced Labour: BFC found one factory where workers in a factory could not terminate their employment or leave their jobs even with a reasonable notice period in 2022. This factory was not enrolled in BFC's advisory services, and the programme later found that it had closed operations. There were no reported non-compliance cases relating to forced labour in 2023.

Freedom of Association & Collective Bargaining: The non-compliance rates under the cluster are relatively low, all under 10 per cent. However, it is important to recognise that just because no evidence of non-compliance was found during an assessment, this does not mean that there were no issues. The actual number of issues may be higher than those officially documented during annual enterprise assessments.

Occupational Safety and Health: In June 2022, the ILO added "A safe and healthy working environment" as the fifth Fundamental Principle and Right at Work. Occupational Safety and Health (OSH) is the largest cluster and covers the greatest number of questions in BFC's assessment tool. Consistent with findings from previous



years, OSH continued to see some of the highest non-compliance rates among factories. However, there are some areas with notable improvements between 2022 and 2023, including compliance with labelling chemicals and hazardous substances, conducting periodic emergency drills, and having a factory OSH policy.

Working Conditions

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Compensation: BFC monitors various aspects of compensation, including overtime, payment methods and social security and other benefits. Non-compliance with paying workers correctly for annual leave and special leave continued to be a common issue in 2022 and 2023, with some small improvements over the two years. Some factories were also regressing with the requirement to pay workers on time twice per month.

Contracts & Human Resources: Many factories were found not complying with the legal requirements regarding shop stewards and some common issues included elections not being held on time and inability to meet election procedure requirements. BFC also found evidence of bullying and harassment in 27 factories in 2023 and 21 factories in 2022. Supervisors or managers yelling, shouting or using inappropriate language with production workers were some of the common issues, and high production targets and incentive-based pay were cited as potential reasons behind such behaviour among supervisors. A notable number of factories were also found not complying with the specified terms and conditions in employment contracts and not compensating workers for unused paid annual leave when they resign or are terminated fully in accordance with the law. On the positive side, factories have made improvements around establishing systems to ensure workers understand the terms and conditions of employment.

Working Time: Most non-compliance under this cluster was related to issues related to overtime. Around 48 per cent of the assessed factories were documented for excessive overtime as they were operating beyond the two-hour per day legal limit. Many factories highlighted production pressures and sourcing practices, including rush orders and last-minute changes, as the reason behind their lack of production planning and reliance on overtime. Some factories were also documented for not giving workers the legally mandated time off for breastfeeding during work hours.



1. Introduction

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Better Factories Cambodia (BFC) is part of the Better Work programme that is a partnership between the International Labour Organization (ILO) and the International Finance Corporation (IFC). The ILO flagship programme brings together stakeholders from all levels of the global garment manufacturing industry to improve working conditions, enhance respect for labour rights, and boost competitiveness. BFC was established in 2001 at the request of the Royal Government of Cambodia and the United States government and is longest running Better Work programme in a country. BFC regularly prepares public reports synthesizing industry updates and highlighting non-compliance findings and trends in Cambodia's garment industry.

This BFC Annual Report 2022-23 covers the period January 2022 – December 2023. The analysis focuses on compliance trends of garment factories of 2022 and 2023 and provides an overview of the working conditions. This report covers assessment findings from 316 factories in 2022 and 364 factories in 2023. To provide some context, this report starts with a brief overview of the programme and the industry context. The second section presents the analysis of assessment findings. The concluding section presents some recommendations and key areas for work for BFC.

Industry Context

The garment, footwear and travel goods (GFT) sector remains at the heart of the Cambodian economy. In 2022, the Royal Government of Cambodia launched its "GFT Sector Development Strategy 2022–2027," which underlined the sector's vital role as a significant economic growth pillar with exports averaging over 70 per cent of Cambodia's total merchandise exports over the past decade. The strategy emphasizes the sector's direct and indirect contributions to support the "livelihood of at least 2.5 to 3 million Cambodian people." It also outlines the sector's challenges related to its competitiveness and long-term sustainability. As the sector's current exports primarily rely on preferential market access granted by the United States and the European Union, it remains highly vulnerable to the withdrawal of such agreements or to other severe external shocks (e.g., recessions). The GFT strategy also identifies the need for a roadmap and vision to upgrade the sector into an industry with high value-added production, more robust sustainability, and high competitiveness and to help support Cambodia's economic diversification by 2027.

In 2023, a global market slowdown led to a decline in sourcing from Cambodia, resulting in temporary production suspensions and facility closures in many factories.



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According to a General Department of Customs and Excise report, around US\$ 11.1 billion garment, footwear and travel goods products were exported from Cambodia in 2023, around a 13 per cent drop compared to US\$12.8 billion in 2022. Figure 1 shows Cambodia's GTF exports between 2022 - 2023.

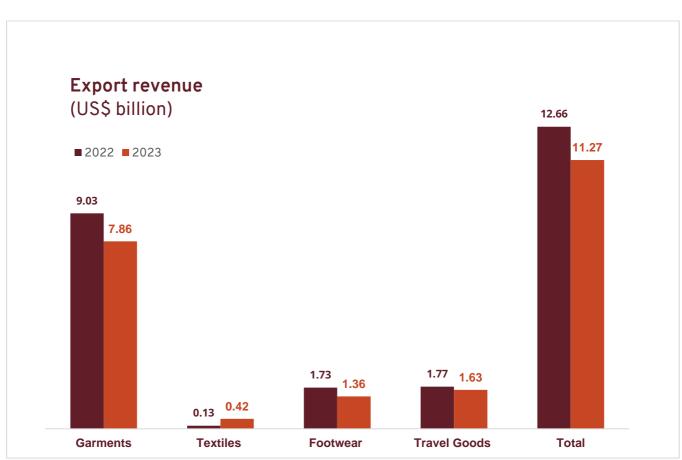


Figure 1. Cambodian GTF exports (2022-2023) in US\$ billions.

Numerous layoffs and uncertainty sparked industrial relations disputes at the enterprise level, but despite the sluggish global market, the sector recovered its growth in December 2023 with positive outlooks for 2024.

The monthly minimum wage in the garment, footwear and travel goods sector increased from US\$194 in 2022 to US\$ 200 in 2023. In addition to the wage increase, the government continued providing a monthly allowance of US\$ 40 to each worker whose contract was suspended. In September 2023, the National Council of Minimum Wage announced a new minimum monthly wage in 2024 that was further increased to US\$ 204 for regular workers and US\$ 202 for probationary workers.



BETTER FACTORIES CAMBODIA IN NUMBERS



Figure 3. Better Factories Cambodia at a glance (data from 2022 – 2023)

2022	2023
671 Factories	703 Factories
654,459 Workers (79% women)	648,359 Workers (78% women)
474 Asessment reports	454 Asessment reports
240 Factories in advisory	254 Factories in advisory
1,322 Advisory meetings (341 virtual)	1,391 Advisory meetings (436 virtual)
2,845 Training participants (49% women)	2,908 Training participants (50% women)
80 Buyers (43 buyer partners)	107 Buyers (46 buyer partners)

In addition to its direct factory engagement, BFC emphasizes sustainability in its initiatives focusing on providing technical assistance and capacity building to the Ministry of Labour and Vocational Training's (MVLT) labour inspectors, OSH officials, and key industry partners. Through collaborations and joint actions with MLVT and Textile, Apparel, Footwear and Travel Goods Association in Cambodia (TAFTAC) foster shared responsibility, supporting a resilient industry. The focus on long-term impacts includes Training-of-Trainers and joint assessments to transfer BFC's "know-how" in improving the working conditions of the industry. In recent years, BFC has also deepened its collaboration with trade unions, gaining a better understanding of their challenges and internal gaps, and enhancing its support for unions.

2. Compliance Overview

This BFC Annual Report focuses on non-compliance data from garment factories collected through enterprise assessments in 2022 and 2023³. The enterprise assessment – a two-day unannounced onsite visit – is a key component of the programme's core services. During this assessment, factories are marked as non-compliant if the assessment team finds that they do not adhere to specific components of Cambodian labour law or the ILO labour standards.

All enterprise assessments are conducted using the Compliance Assessment Tool (CAT) that is organised into eight clusters. The first four clusters comprise Child Labour, Discrimination, Forced Labour, and Freedom of Association and Collective Bargaining.. The remaining clusters – Compensation, Contracts and Human Resources, Occupational Safety and Health (OSH), and Working Time – fall under Working Conditions and the national law is used as a benchmark. In June 2022, the ILO added "a safe and healthy working environment" as the fifth Fundamental Principle and Right at Work. The first four clusters and OSH protect fundamental principles rights at work under the ILO's eight ten Core International Labour Conventions, that are used as a baseline for compliance in these clusters. Although OSH was previously under Working Conditions, this report presents the OSH cluster under fundamental rights to reflect this recognition. The eight clusters are then divided into compliance points, and each compliance point includes several questions. The eight clusters and their compliance points are shown in **Table 1**.

This report covers assessment findings from 316 factories in 2022 and 364 factories in 2023.

³ The BFC conducts enterprise assessment in the GFT sectors; however, for the 2022-2023 annual report, it focuses on non-compliance data from only the BFC's registered garment factories



LIMITATIONS IN THE ASSESSMENT PROCESS

Detailed factory assessment reports are based solely on observations, investigations, and analyses conducted during assessment visits. Before the reports become official, factories are given seven calendar days to provide feedback and clarifications, which in some cases impacts the language in the final report. Certain issues included sexual harassment and freedom of association remain difficult to assess and verify independently. Getting enough evidence on these issues to determine violations can be challenging due to a range of reasons, including the sensitive nature of the issues and the reluctance of workers to report incidences. Regardless of the low level of cases found, BFC has supported factories and unions to strengthen industrial relations. The low literacy level of a large percentage of workers can affect the integrity of documentation related to workers' consent for overtime work, storing personal documents, disciplinary procedures and employment rights. To overcome such limitations, to the extent possible, information provided by workers and management are crosschecked through representative interview samples and various documents maintained at the factory.

Compliance assessments help determine objective answers to compliance questions, but the binary 'yes or no' structure of answering compliance limits our ability to understand the severity or scale of non-compliance in each case. For example, factories may significantly improve a problem but may still not qualify as compliant, especially when the labour law is



stringent. For factories that are in BFC's advisory services, improvements are being reported in progress reports and shared with the relevant factory and relevant brands.

COMPLIANCE SITUATION

Table 1 summaries the non-compliance rates by compliance point for the 364 assessed garment factories in 2023 and the 316 factories in 2022.

			NC-Rate		NC-Rate	C-Rate Chang
	Cluster	Compliance Point	2022 (N=316)	2023 (N=364)	e	
		Child Labourers	0.0%	0.3%	0.3%	
	Child Labour	Documentation and Protection of Young Workers	1.6%	0.5%	-1.0%	
		Hazardous Work and other Worst Forms	0.0%	0.0%		
		Bonded Labour	0.0%	0.0%		
	Forced Labour	Coercion	0.3%	0.0%	-0.3%	
	Forced Labour	Forced Labour and Overtime	0.0%	0.0%		
S		Prison Labour	0.0%	0.0%		
Ő	Fuendam of	Collective Bargaining	0.9%	1.4%	0.4%	
DAI	Freedom of Association and	Freedom to Associate	3.2%	1.9%	-1.2%	
Z		Interference and Discrimination	7.0%	5.5%	-1.5%	
ST/	Collective	Strikes	0.3%	0.0%	-0.3%	
CORE LABOUR STANDARDS	Bargaining	Union Operations	3.2%	1.6%	-1.5%	
ğ		Gender	3.8%	2.5%	-1.3%	
AB	Distriction	Other Grounds	0.0%	0.0%		
ц,	Discrimination	Race and Origin	0.0%	0.0%		
No.		Religion and Political Opinion	0.0%	0.0%		
0		Chemicals and Hazardous Substances	56.3%	47.5%	-8.8%	
		Emergency Preparedness	72.5%	62.6%	-9.8%	
		Health Services and First Aid	91.5%	88.5%	-3.0%	
	Occupational	OSH Management Systems	88.3%	87.9%	-0.4%	
	Safety and	Welfare Facilities	83.2%	77.5%	-5.8%	
	Health	Worker Accommodation	22.5%	17.3%	-5.2%	
		Worker Protection	91.5%	85.7%	-5.7%	
		Working Environment	93.7%	94.5%	0.8%	
10	Combus she ou il	Contracting Procedures	27.5%	24.7%	-2.8%	
NS	Contracts and	Dialogue, Discipline and Disputes	57.3%	48.6%	-8.7%	
Ĕ	Human	Employment Contracts	69.9%	59.6%	-10.3%	
10	Resources	Termination	67.1%	54.9%	-12.1%	
WORKING CONDITIONS		Method of Payment	19.9%	31.0%	11.1%	
Ŭ		Minimum Wages/Piece Rate Wages	18.7%	16.5%	-2.2%	
ž	_ ·	Overtime Wages	29.1%	16.5%	-12.6%	
R	Compensation	Paid Leave	58.2%	53.6%	-4.7%	
õ		Premium Pay	0.9%	0.8%	-0.1%	
5		Social Security and Other Benefits	46.5%	36.0%	-10.5%	

 Table 1. Non-compliance rate by compliance point (2022-2023).



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		NC-F	Rate	Chang
Cluster	Compliance Point	2022	2023	e
		(N=316)	(N=364)	
	Wage Information, Use and Deduction	35.8%	26.4%	-9.4%
	Leave	32.6%	25.8%	-6.8%
Working Time	Overtime	55.7%	53.6%	-2.1%
	Regular Hours	14.2%	17.3%	3.1%

CORE LABOUR STANDARDS

CHILD LABOUR

In 2023, BFC found one factory employing underage workers under the age of 15. Through visual observations, checking employment records and interviews, BFC found two underage workers in a factory in March 2023. The investigation confirmed that one of the girls was 13 years old, and another was 14 at the time of the assessment. By BFC's standard on child labour remediation policy, the team immediately shared the results of the investigation. The team explained the standard of child labour remediation policy and procedure to the employer. The factory management was cooperative in reaching an agreement on the remediation measures of child labour and agreed to make the payment as per the remediation policy to pay the workers' monthly wage until they reach 15 years of age and their training fees. The girls were also removed from work and placed in a public high school.

Employers must check at least two of the workers' original documents and keep a copy of their documents for age verification (e.g., ID cards and birth certificates). Ideally, the employer should keep a copy of at least two such documents for verification record. Four factories in 2022 and two in 2023 were non-compliant with this requirement on keeping copies of the document. In both non-compliance cases in 2023, the factories did not keep the required records for their casual and probationary workers.

DISCRIMINATION

Freedom from discrimination is a fundamental human right. The ILO Discrimination (Employment and Occupation) Convention No. 111, 1958, defines discrimination as any distinction, exclusion, or preference made based on prohibited grounds (i.e., race, colour, sex, religion, political opinion, national extraction, or social origin), which can impair equal opportunity or treatment in employment. The Convention also allows countries to identify additional grounds for discrimination requiring protection. The CAT has four compliance points under Discrimination: Gender, Race, and Origin,



Religion and Political Opinion, and Other Grounds. Identifying instances of discriminatory behaviour can be more difficult in some areas than others. Overall, non-compliance under this cluster is very low, but some issues were observed under the Gender compliance point.

BFC documented that in 2023, five factories used gender as a factor in hiring decisions, compared to seven factories in 2022. In these instances, male workers were required to provide additional documents, such as behavioural certification or guarantee letters, while women were not. This unequal treatment was based on the perception that male workers are more likely to cause trouble. BFC has advised the factory management to acknowledge this as an unequal treatment based on gender. This will be monitored in the future.

Two factories were found terminating pregnant workers or forcing them to resign in 2023. The factory management were requiring pregnant workers to resign, and new female recruits were asked about their pregnancy status during the hiring process. In a specific case, a pregnant probationary worker was forced to resign and had her wages deducted, leading to a dispute that was later resolved with the factory agreeing to reimburse her wages. Additionally, there was one factory where gender was a deciding factor in access to promotions and training, and one where job announcements referred to the applicant's gender.

FORCED LABOUR

The Forced Labour cluster covers the compliance points of 'Coercion,' 'Bonded Labour,' 'Prison Labour' and 'Forced Labour.' In 2022, BFC found one case where workers in a factory could not terminate their employment or leave their jobs even with a reasonable notice period. The non-compliant factory used two employment contracts – a two-month probationary and a three-month fixed contract. The factory was not enrolled in the programme's advisory services and closed its operations in 2023. Evidence of such cases was not found in any of the assessed factories in 2023.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Freedom of Association and Collective Bargaining cluster includes the following compliance points: Collective Bargaining, Freedom to Associate, Interference and Discrimination, and Union Operations. Non-compliance rates for these points are relatively low, all under 10 per cent. It is important to recognize that just because no evidence of non-compliance was found during an assessment, it does not mean that there were no issues. The actual number of issues may be higher than those officially



documented during annual factory assessments. This is due to various reasons, including workers' fear of retaliation, weak unions with limited resources, covert practices to undermine freedom of association, social factors, and limited worker awareness. The following presents the issues observed and documented during factory assessments.

In 2023, three factories had Collective Bargaining Agreements (CBA) with less-thanfavourable provisions, and two factories failed to implement parts of their CBA's provisions.

Four factories did not allow workers to freely form or join a union, while three factories required their workers to join a union in 2023. In some cases, workers were not given clear explanations during the union membership process, and union fees were automatically deducted without the worker's informed consent.

BFC found evidence of employer involvement in union decision-making in nine factories during their assessment. Another nine factories were non-compliant for employer involvement in trying to control unions. In some cases, union leaders were appointed by the management or were brought in without an election process. There were also instances where the factory management provided union leaders with financial incentives, often paid in cash and outside the payroll documents. Other issues included factory administrative staff handling union dues instead of the union itself.

Unions should be provided with a place to post their leaders' names, positions, and activities. Five factories were non-compliant with this requirement in 2023 – a slight improvement from eight factories in the previous year. One factory was documented for not deducting union dues from wages upon worker request.

Freedom of Association and Collective Bargaining Collective Bargaining	2022 (n=316)	NC-Rate 2023 (n=364)
If there is a collective bargaining agreement, are the provisions at least as favourable for workers as the law?	0.3%	0.8%
Has the employer failed to implement any of the provisions of the collective bargaining agreement(s) in force?	0.6%	0.6%
Freedom to Associate		
Can workers freely form and join a union?	2.2%	1.1%

Table 2. Freedom of Association and Collective Bargaining



Does the employer require workers to join a union?	0.6%	0.8%
Can the union(s) freely form and join federations and confederations of their choice?	0.3%	0.0%
Interference and Discrimination		
Is the employer involved in union decision making, the formation of the constitution and rules, in union activities, administration, finances or elections?	3.8%	2.5%
Has the employer taken steps to manipulate the union or to bring the union(s) under its control?	2.5%	2.5%
If there is more than one union, does the employer treat them equally?	0.0%	0.3%
Has the employer terminated a union official without getting permission from the Ministry?	0.3%	0.3%
Has the employer terminated any worker or not renewed their contract due to the worker's union membership or activities?	0.3%	0.00%
Strikes		
Has the employer punished any workers for participating in a strike?	0.3%	0.0%
Union Operations		
Does the employer provide a place to post the names, positions, and activities of the union leaders?	2.5%	1.4%
Does the employer deduct union dues from wages when workers request this in writing?	0.3%	0.3%
Do union representatives have access to workers in the workplace?	0.6%	0.0%

OCCUPATIONAL SAFETY AND HEALTH

A significant number of non-compliances among assessed factories fall under the OSH cluster. The OSH cluster covers eight compliance points and houses the highest number of questions in the compliance assessment tool.

Chemical and Hazardous Substances: Although the overall non-compliance rates are notable, there have been some significant improvements under the compliance point. More factories were found complying with many legal requirements related chemical and hazardous substances in 2023 compared to the previous year. A much higher number of factories were documented taking action to limit workers' exposure to chemicals and hazardous substances – the non-compliance rate decreased from 36 per cent (115 factories) to 23 per cent (82 factories). Other notable areas of improvement



included how factories properly label the substances and the provision of an adequate number of washing and cleaning facilities, both of which saw a 13-percentage point decrease in the non-compliance rate.

Table 3. OSH: Chemical and Hazardous Substances

		NC-Rate
OSH: Chemical and Hazardous Substances	2022	2023
	(n=316)	(n=364)
Are chemicals and hazardous substances properly labelled?	50.3%	37.4%
Does the employer keep an inventory of chemicals and hazardous substances used in the workplace?	32.6%	24.5%
Has the employer taken action to prevent and limit workers'	32.070	21.370
exposure to chemicals and hazardous substances?	36.4%	22.5%
Has the employer effectively trained workers who work with		
chemicals and hazardous substances?	32.3%	20.1%
Does the employer have chemical safety data sheets for the		
hazardous chemicals used in the workplace?	31.6%	19.8%
Are chemicals and hazardous substances properly stored?	26.3%	18.1%
Does the employer provide adequate washing facilities and		
cleansing materials in the event of exposure to hazardous		
chemicals?	25.9%	13.5%
Has the employer prepared for response, control and cleaning of		
chemical spills?	16.8%	8.5%
Are chemical mixing rooms properly equipped and used?	2.5%	0.5%

Emergency Preparedness: Most factories were seen conducting periodic emergency drills – the non-compliance rate decreased from 27 per cent in 2022 (84 factories) to 13 per cent in 2023 (48 factories). Although there were improvements in obstruction-free escape routes and factories having fire detection and alarm systems, the areas require further improvements.

Health Services and First Aid: Improvements under the 'Health Services and First Aid' compliance point has been limited. Most notably, more factories were complying with medical examinations for works and providing first-aid training for workers. The non-compliance rate related to medical examinations dropped from 55 per cent in 2022 to 42 per cent in 2023, and the rate for first-aid training dropped from 14 per cent to 9 per cent.



The industry continued to see high levels of non-compliance related to adequately equipped and staffed infirmaries. As per the national labour law, workplaces with more than 50 workers are required to set up infirmaries in spaces that are accessible and well-ventilated and to have a certain number of medical staff, depending on the workforce size. Some common issues included the inability to meet the staffing requirements, the lack of necessary equipment or the required number of beds in proportion to the workforce, a lack of privacy for female workers, inadequate attendance records and documentation, and general cleanliness and maintenance.

The non-compliance rate on functioning HIV/AIDS Committee decreased from 76 per cent in 2022 to 68 per cent in 2023. Although this is an improvement, more remains to be done to support factories in meeting this requirement. In Cambodia, factories with more than 50 workers are required to set up HIV/AIDS Committees. Factories with fewer than 50 workers must set up HIV/AIDS Working Groups. The role of these Committees and Working Groups is to educate employees on HIV/AIDS and its prevention and to support those infected or affected by HIV/AIDS. In many cases of non-compliance, the factories have formed HIV/AIDS committees. However, they are often not functioning – for example, several members are unaware of their roles, there are infrequent meetings, and there is a lack of training and awareness programmes. Sometimes, the Committees did not include union representatives or had insufficient worker representation.

		NC-Rate
OSH: Health Services and First Aid	2022	2023
	(n=316)	(n=364)
Does the workplace have an adequately equipped and staffed		
infirmary?	76.3%	75.3%
Does the workplace have a functioning HIV/AIDS Committee?	75.9%	67.9%
Do workers undergo a medical examination before being		
employed?	55.4%	41.8%
Has the employer ensured that there is a sufficient number of		
readily accessible first aid boxes/supplies in the workplace?	22.8%	18.1%
Has the employer provided first-aid training for workers?	17.4%	9.1%
Does the employer address safety and health risks to pregnant		
workers or workers who are nursing?	2.2%	1.1%

Table 4. OSH: Health Services and First Aid

OSH Systems: Functioning systems are important in identifying hazards and implementing preventative measures, and there is scope for significant improvement in



this area among the assessed factories. About 66 per cent of the assessed factories (241 factories) in 2023 did not have all the legally required construction and building permits; an increase from the 62 per cent (197 factories) in 2022. Some common issues among non-compliant factories included the development of policies without worker consultations, ineffective functioning of OSH committees, and incomplete building permits. Although the non-compliance rates remained relatively high in 2023, there have been some minor improvements in conducting regular hazard and risk assessments, factories having an OSH policy and documentation of work-related accidents and illnesses.

Table 5. OSH Systems

		NC-Rate
OSH: Systems	2022	2023
	(n=316)	(n=364)
Does the employer have legally required construction/building permits?	62.3%	66.2%
Does the employer conduct regular hazards and risk assessment?	63.0%	52.2%
Has the employer developed mechanisms to ensure cooperation	53.5%	46.2%
between workers and management on OSH matters?	00.070	101270
Is there an adequate OSH Policy that is signed by top management?	55.7%	42.3%
5		
Does the employer record work-related accidents and illnesses and report them to the Ministry?	24.7%	15.7%

Welfare Facilities: There were some minor improvements under 'Welfare Facilities' in 2023. More factories were documented as having functioning daycare centres or paying their employees the required childcare costs – the non-compliance rate decreased from about 50 per cent in 2022 (157 factories) to 41 per cent in 2023 (148 factories). Among the non-compliant factories, some common challenges were designated daycare places that lacked necessary facilities, maintenance, and dedicated staff. Many factories have set up daycares in inappropriate or shared spaces. In some cases, the employer inconsistently provided childcare allowances to their workers; they often excluded newly recruited workers and workers on probation. Although most factories provided workers with safe drinking water, about 54 per cent of the assessed factories did not provide cups or sanitary means of drinking water in 2023.



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Table 6. OSH: Welfare Facilities

OSH: Welfare Facilities	2022 (n=316)	NC-Rate 2023 (n=364)
Does employer provide cups or other sanitary means for drinking water?	61.1%	54.4%
Does the workplace have a functioning and accessible nursing room?	56.0%	47.3%
Does the workplace have a functioning day care centre or pay childcare costs of women employees?	49.7%	40.7%
Does the workplace have adequate accessible toilets?	27.2%	23.1%
Does the workplace have adequate hand washing facilities and adequate soap?	16.8%	14.3%
Does the employer provide workers enough free safe drinking water?	61.1%	54.4%





Box 1. Social protection and childcare services in Cambodia's garment industry

In 2023, BFC collaborated with ILO Cambodia on a research study: "Social Protection and Childcare Services in Cambodia's Garment Industry." The study sought to understand garment workers' needs and perceptions regarding social protection entitlements and childcare preferences. Specifically, it explored how informal factory workers decide to seek formal employment and social protection, and how childcare needs influence work preferences. The study adopted a qualitative approach, focusing on understanding workers' experiences from their own perspective.

The study found that workers in subcontracting factories face insecure and more precarious work. They were often paid by piece rate, received limited benefit payments and most did not have a contract. Although such factories offer more flexibility, their practices related to wage deductions and overtime appear to be quite strict. Even with this, women workers, especially those with care responsibilities, preferred to work in these lower tier factories as they offer certain flexibilities, including working hours and proximity to their homes. Workers who show preference to work in the formal sector noted age discrimination and a lack of identification documents as obstacles to finding formal employment. Women over the age of 30 often face difficulty finding work in the formal sector.

Enterprise childcare was also not commonly available. Where institutional childcare is available, workers are unclear about what it comprises. Most people preferred having family look after their children. This view is strongly influenced by cultural and social understanding. There also appeared to a lack of trust and understanding of employer-provided or institutional childcare. However, for the subset of workers without family support, institutional childcare could have significant positive impact on their employment and wellbeing.



Worker Accommodation: There was some limited progress under 'Worker Accommodation' in 2023, with slightly fewer factories having issues related to adequate preparation for emergencies in employer-provided accommodations. The noncompliance rate dropped from 20 per cent in 2022 (63 factories) to 14 per cent in 2023 (51 factories).

Worker Protection: More factories did not have all the required permits for setting up heavy machinery, such as boilers and generators. The non-compliance rate at 49 per cent was higher than that in 2022. Factories generally had their technical inspection certificates, but in some cases, these certificates had expired, or the factory was waiting for their renewed certificates at the time of assessment. Some non-compliances were also due to discrepancies in the approved industrial layouts and the actual installation of the machinery in the factory – for example, blocked emergency exits and overloading circuits – which raises occupational hazards. In some cases, machine operators did not have the necessary certifications for all the machines they were running.

In 2023, 149 factories were documented for not providing their workers with dust masks, which is an increase from the previous year. Additionally, more factories were documented not complying with providing their workers with earplugs when necessary. Common reasons behind these non-compliances were an irregular provision of masks and earplugs, a lack of a clear system to replace them due to management oversight, and a lack of worker awareness about their availability and importance.

		NC-Rate
OSH: Worker Protection	2022 (n=316)	2023 (n=364)
Does the employer have the legally required permits for the installation and operation of boiler, generator, compressor, and pressure vessels?	47.2%	48.9%
Do the operators / technicians for boiler, generator, compressor, and pressure vessels have legally required permit and training?	53.5%	43.1%
Has the employer provided workers with dust masks when necessary?	37.7%	40.9%
Does the employer comply with ergonomic requirements?	48.7%	33.2%
Has the employer provided workers with ear plugs when necessary?	26.9%	27.2%

Table 7. OSH: Worker Protection



Has the employer provided workers who work with chemical substances with proper clothing and personal protective equipment when necessary?	35.8%	23.9%
Are workers effectively trained and encouraged to properly use personal protective equipment and machines?	24.7%	20.6%
Are guards properly installed and maintained on all dangerous machines and equipment?	20.9%	12.1%
Are electrical wires, cables, switches, plugs and equipment (e.g. transformer, generator, electrical panel, circuit breakers) properly installed, grounded (for equipment), and maintained?	14.9%	8.8%
Has the employer provided workers with other PPE when necessary?	8.9%	5.2%
Are appropriate safety warnings posted in the workplace?	8.2%	4.7%
Has the employer taken legally required measures to protect workers from falls from heights?	4.4%	2.7%
Has the employer provided workers with necessary PPE to protect against wet processes when necessary?	3.8%	2.7%
Has the employer provided workers with metal gloves when necessary?	1.9%	0.8%

Working Environment: The non-compliance rate with lighting in the workplace remained high at around 82 per cent in 2023. Among the non-compliant factories, multiple sections had lighting levels below the legal requirements. This also included areas such as cutting, sewing and quality control. Inadequate lighting on garment factory floors could lead to increased eye strain among workers and contribute to higher rates of workplace accidents. Further, inadequate lighting can also lower productivity.

In some cases, the sewing machines did not have local lamps, which is another cause of concern. BFC encourages factories to install the needed lights and establish ways to monitor and maintain the lighting infrastructure regularly.

Temperature and ventilation in the factories are other areas of concern under 'Working Environment' – the non-compliance rate was 65 per cent in 2023 and 57 per cent in 2022. It is understood that the temperature range inside a factory will depend on the season and that the indoor temperature will be cooler than the outdoor temperature. BFC recommends a maximum temperature of 32°C indoors, and that temperature should be measured in different sections during midday. In practice, the workplace temperature often exceeded the recommended maximum inside the factories. Temperatures in the ironing and packing sections had consistently high temperatures.



Many workers interviewed during factory assessments also complained about discomfort due to the hot and suffocating conditions inside the factory, which was at times worse than outside, during the warmer months. It is worth noting that 2023 saw some of the highest and record-breaking temperatures across the world due to a changing climate. While many factories are trying to mitigate the increased temperatures by installing more fans and, in some cases, air conditioning units in some sections, much more needs to be done. Continuous monitoring and further actions, such as enhancing ventilation systems or implementing more robust cooling solutions, are needed to bring the temperatures down on factory floors. There is perhaps also a case for the global garment industry to support these factories in helping mitigate the impact of a changing climate on workers.

Table 8. OSH: Working Environment

		NC-Rate
OSH: Working Environment	2022	2023
	(n=316)	(n=364)
Is the workplace adequately lit?	83.2%	81.9%
Are the temperature and ventilation acceptable?	57.3%	65.4%
Is the workplace clean and tidy?	43.7%	36.8%
Are noise levels acceptable?	26.6%	24.2%

WORKING CONDITIONS

CONTRACTS AND HUMAN RESOURCES

Dialogue, Discipline and Disputes: Many factories were found not complying with the legal requirements regarding shop stewards in 2023 and 2022. About 45 per cent of all assessed factories in 2023 were non-compliant with this requirement. Some common issues included elections not being held on time and inability to meet election procedure requirements (e.g., secret ballots, meeting rooms).

Assessments also found evidence of bullying and harassment in 27 factories in 2023 (about seven per cent non-compliance rate). This is a slight increase from the 21 factories found non-compliant in 2022. Supervisors or managers yelling, shouting or using inappropriate language with production workers were some of the common issues. High production targets and incentive-based pay were cited as potential reasons behind such behaviour. In some instances, the factory management attempted to address these issues through training supervisors on workplace respect and



collaboration. However, production pressure, often due to short lead times, was cited as a major reason behind such behaviour on some factory floors.

Employment Contracts: In 2023, 145 factories did not have employment contracts that specified the terms and conditions of employment as required by the law. This is similar to the previous year when 144 factories were found non-compliant. Here, although the share of factories has dropped by some nine percentage points – from about 46 per cent to 40 per cent – the absolute number of non-compliant factories has remained the same.

There has been a small improvement around establishing systems to ensure workers understand the terms and conditions of employment, with the non-compliance rate dropping from about 45 per cent in 2022 to 35 per cent in 2023. The actual number of non-compliant factories decreased from 142 to 128. The factories conducted orientation sessions for newly hired workers, providing information on their respective teams and employment conditions. This included details on the duration of employment, work hours, compensation, benefits, and the procedures for resigning from their positions as outlined in their employment contracts.

Termination: Around 46 per cent of all assessed factories were non-compliant with the legal requirements for compensating workers for unused paid annual leave when they resign or are terminated. The actual number of non-compliant factories also decreased from 186 in 2022 to 169 in 2023. Similarly, more factories were found paying terminated workers within the legally mandated 48 hours – the number of non-compliant factories decreased from 116 to 91. Normally, management paid the outstanding wages and other required benefits within the legal timeframe for terminated workers. The remaining challenges under this compliance point include requiring those resigned workers to collect their payment on the payday instead of paying within 48 hours.

		NC-Rate
Contract and Human Resources	2022 (n=316)	2023 (n=364)
Contracting Procedures	(11-310)	(11-304)
Does the employer comply with the legal limit on the use of fixed		
term contracts?	20.9%	19.2%
Does the employer include the entire period of continuous		
employment when determining workers' entitlements to maternity		
leave, attendance bonus, seniority bonus, and/or annual leave?	8.5%	10.7%

Table 9. Contracts and Human Resources



Have you found non-compliance with legal requirements for		
compensation, contracts, OSH and/or working time pertaining to non- production workers and/or sub-contracted workers?	4.8%	2.7%
Does the employer comply with limits on the period of employment	4.070	2.770
for apprentices and probationary workers?	2.9%	2.2%
Do workers have to pay anyone to get a job?	0.3%	0.0%
Dialogue, Discipline and Disputes		
Does the employer comply with requirements regarding shop		
stewards?	54.1%	45.1%
Have any workers been bullied, harassed, or subjected to humiliating		
treatment?	6.7%	7.4%
Are disciplinary measures proportional to the seriousness of workers'		
misconduct?	0.0%	0.3%
Has the employer complied with final conciliation agreements,		
arbitration awards, or court orders arising from individual or		
collective disputes?	0.6%	0.3%
Are disciplinary measures proportional to the seriousness of workers'		
misconduct?	1.0%	0.0%
Employment Contracts		
Do the employment contracts specify the terms and conditions of		
employment?	45.6%	39.8%
Does management have a system to ensure that workers understand		
the terms and conditions of employment?	44.9%	35.2%
Do the employment contracts comply with Cambodian labour law and		
with the factory's internal regulations?	18.4%	12.6%
Do the internal regulations comply with legal requirements?	13.6%	9.3%
Do all persons who perform work for the factory, both on the		
premises and offsite, have a contract?	2.5%	0.8%
Termination		
Does the employer compensate workers for unused paid annual leave		
when they resign or are terminated?	58.9%	46.4%
Does the employer pay all outstanding wages and indemnities within		
48 hours of termination?	36.7%	25.0%
Does the employer comply with legal requirements before		
suspending workers or reducing the size of the workforce due to		
changes in operations?	2.2%	4.9%
Does the employer pay workers the correct severance pay?	4.1%	2.7%
Does the employer pay workers their outstanding wages and the		
correct seniority indemnity for dismissal?	2.5%	1.6%



Does the employer pay terminated workers the correct damages when required?	2.2%	1.6%
Does the employer provide workers proper notice, and an opportunity to defend themselves before they are terminated based		
on their conduct or performance?	0.6%	1.1%
Does the employer only terminate workers for valid reasons?	0.6%	0.8%

COMPENSATION

Method of Payment: Starting in 2019, employers are required to pay all workers their wages twice per month, with the first payment of their wages should not be less than half of the basic wage. The digital wage payments to workers have increased from 50 per cent to 72 per cent from February 2022 to June 2024. In 2023, around 30 per cent of all assessed factories were non-compliant. Both the non-compliance rate and the actual number of non-compliant factories have increased. Some common issues behind these non-compliances included incorrect first payment amount, exclusion of paid leave in calculations, late payments, one-time payments for new workers and overall inconsistent payment practices. A small number of factories were non-compliant with paying workers full wages in the required manner. The most common issue was making the payment after working hours and during overtime.

Minimum Wages / Piece Rate Wages: Under the 'Minimum Wages / Piece Rate Wages' compliance point, most factories assessed were documented meeting the legal requirements. Most number of non-compliances here are in regard to setting piece-rate prices at a level that allows the worker to earn the minimum wage. The number of factories not meeting this requirement increased from 42 factories in 2022 to 56 factories in 2023. In several cases, most workers did not earn enough through piece-rate wages alone, and the employer had to compensate by bringing their earnings up to the minimum wage. This indicates that while the legal requirement of paying at least the minimum wage is being met, the piece-rate system itself may not be effectively set, as it fails to ensure that a sufficient proportion of workers can meet the minimum wage through their productivity alone.

Overtime Wages: Most enterprises met the national legal requirements related to overtime payments. An area of notable improvement is in employers paying the correct meal allowances or giving free meals to all workers when they work overtime. The law



requires employers to pay workers a meal allowance of 2,000 Riels (US\$ 0.5) every time they work overtime. The non-compliance rate decreased from 27 per cent in 2022 (85 factories) to about 15 per cent in 2023 (53 factories).

Paid Leave: Most non-compliances are under the Cluster fall under 'Paid Leave.' A significant number of factories did not meet the legal requirements for payments for annual leave and special leave. While the overall share of factories out of compliance has decreased between 2022 and 2023, the actual number of non-compliant factories has increased. 149 factories were non-compliant with annual leave pay in 2022, but the number jumped to 156 in 2023.

More factories were seen paying workers correctly for maternity leave – the noncompliance rate decreasing from 16 per cent (52 factories) in 2022 to 10 per cent in 2023 (35 factories). However, some challenges remain among the non-compliant factories. A recurring issue is the incorrect calculation of maternity leave payments. Employers must pay workers on maternity leave half of their average monthly earnings in the past 12 months. Some factories continue the practice of paying workers only half of their basic wages when they are on maternity leave. Another common issue among non-compliant factories involves the timing of payments.

Social Security and Other Benefits: Most non-compliances observed under this compliance point are related to attendance bonus payments and seniority indemnity payments. There, however, have been some improvement over the past two years. Compared to 2022, more factories paid their workers correctly during their leave in 2023 – the non-compliance rate decreased from 22 per cent (70 factories) to 13 per cent (48 factories). Furthermore, more factories were also documented paying correct attendance bonuses to all new workers and casual workers – the non-compliance rate halved from around 14 per cent to 7 per cent.

Wage Information, Use and Deduction: In 2023, more factories were documented keeping one accurate payroll record. The non-compliance rate decreased from 22 per cent in 2022 to about 17 per cent in 2023. The actual number of non-compliant factories dropped from 70 to 61 per cent. In many cases of non-compliance, the factories were maintaining separate payroll records for different types of hours and hours. For example, some factories were keeping separate payroll records for overtime exceeding two hours per day, work on Sundays and payment on public holidays. In some cases, overtime and Sunday payments were made directly to workers using cash or other means but were not documented in their entirety. Separate and manual entries often lead to inconsistencies in documentation. BFC continues to advise employers to



maintain a single and comprehensive payroll record as required by law. This is an important tool to ensuring that all workers are paid accurately and on time.

Table 10. Compensation

Compensation	2022 (n=316)	NC-Rate 2023 (n=364)
Method of Payment		
Are workers paid on time, twice a month?	18.0%	29.7%
Are workers' full wages paid in the manner required (in cash, during		
working hours, at the workplace, and directly to workers)?	3.5%	3.3%
Minimum Wages/Piece Rate Wages		
Is the piece rate set at a level that permits workers of average ability		
working normal hours to earn minimum wage?	13.3%	15.4%
Does the employer pay piece rate workers correctly for ordinary		
hours of work when their piece rate earnings exceed minimum wage?	0.6%	1.1%
Does the employer pay at least minimum wage for all types of		
workers other than regular workers?	4.4%	0.8%
Does the employer pay at least minimum wage for ordinary hours of		
work to regular fulltime workers?	1.0%	0.8%
Paid Leave		
Does the employer pay workers correctly for annual leave?	47.2%	42.9%
Does the employer pay workers correctly during special leave?	44.6%	41.8%
Does the employer provide paid sick leave as required by the factory's		
Internal Regulations, or if there are no Internal Regulations, according		
to the Ministry's practice?	13.9%	10.4%
Does the employer pay workers correctly for maternity leave?	16.5%	9.6%
Does the employer pay workers correctly during suspensions of work?	3.2%	4.9%
Does the employer pay workers correctly for the one hour of paid		
time off per day for breastfeeding?	6.0%	4.9%
Does the employer pay workers correctly for paid public holidays?	1.3%	1.1%
Social Security and Other Benefits		
Does the employer pay UDC workers the correct seniority indemnity?	13.3%	13.2%
Does the employer pay all workers who work regularly the correct		
attendance bonus during leave legally required by law?	22.3%	13.2%
Does the employer provide transport home or a place to sleep for		
workers who finish work between 22:00 and 05:00?	7.6%	8.2%
Does the employer pay the correct attendance bonus to all new		
workers who start after the first of the month and to casual workers		
who work regularly?	14.2%	7.1%
Does the employer pay workers the correct seniority bonus?	5.4%	5.2%



Does the employer pay all workers the correct mandatory wage supplements (including transportation and housing allowances)?	8.2%	3.6%
Does the employer pay the required employer contribution to the National Social Security Fund?	3.8%	3.3%
Does the employer pay workers their wages for the first day they miss work due to work-related accidents or illnesses?	1.3%	0.3%
Wage Information, Use and Deduction		
Does the employer keep only one accurate payroll record?	22.2%	16.8%
Has the employer made any unauthorized deductions from wages?	11.7%	9.9%
Does the employer properly inform workers about wage payments		
and deductions?	9.8%	8.2%

WORKING TIME

Most non-compliances are observed at the Overtime compliance point. In 2022 and 2023, about 48 per cent of factories were found to be crossing the overtime limit of two hours per day. There was some improvement in the number of factories getting permission from the Labour Inspectorate before suspending weekly rest days.

Another area of high non-compliance rates is related to giving workers the legally mandated time off for breastfeeding during work hours. As per the law, during the first year of a child's life, the mother is entitled to one hour of paid time off during working hours for breastfeeding, regardless of her employment length. Depending on the worker, this time can be taken off as a one-hour or two-half-hour break. About 20 per cent of assessed factories were non-compliant in 2023 and about 24 per cent in 2022. Lack of awareness and communication of their entitlement under the law were common in these non-compliant factories. In many cases, the non-compliant factories were not granting time off to newly recruited workers or those with different contract types or were giving workers only 30 minutes of paid time off.

Table 11. Working Time

		NC-Rate
Working Time	2022	2023
	(n=316)	(n=364)
Leave		
Does the employer provide workers with time off for breast-feeding during working hours?	24%	20%



Does the employer give workers at least 18 days of annual leave per year and an extra day of annual leave for every three years of service?	9%	9%
Does the employer give workers up to 7 days of time off for special leave per year?	7%	3%
Does the employer provide workers up to six months of time off for sick leave for an illness certified by a qualified doctor?	2%	1%
Does the employer provide workers at least 90 days of maternity leave?	0%	1%
Overtime		
Is overtime work limited to two hours per day?	48%	48%
Does the employer get permission from the Labour Inspector before suspending weekly rest days?	27%	17%
Does the employer get permission from the Labour Inspector before workers work overtime?	9%	6%
Is overtime voluntary?	3%	2%
Regular Hours		
Do the working time records reflect the hours actually worked?	10%	9%
Does the employer provide required weekly rest periods?	5%	9%



3. Looking Ahead

This Annual Report highlights some noteworthy trends in Cambodia's garment industry, focusing on the state of compliance in 2022 and 2023. Although there have been some improvements over the years, more work remains to be done to realize sustainable compliance in the industry.

- In its current strategy, BFC continues its efforts to improve conditions in the GTF sectors and to also support national partners in tackling emerging challenges. The primary responsibilities of BFC as set out in the strategy involve improving the culture of compliance within the garment, footwear, and travel goods sector. This includes supporting partners streamline inspections and help enhance the effectiveness of labour inspectorate measures. Additionally, BFC continues to facilitate capacity building and knowledge transfers between BFC and the MLVT.
- Going forward, BFC will continue implementing its Joint Action Plan with MLVT, conducting joint assessments with labour inspectors in selected factories of the travel goods and bag sector. Priority will be given to technical assistance and capacity building for constituents and factories on critical topics such as gender-based violence and harassment (GBVH) and Human Rights Due Diligence (HRDD)-related topics including grievance mechanisms. BFC will continue to work closely with industry associations and unions to further professionalize and strengthen their capacity in supporting factories. This includes building TAFTAC's capacity in institutionalising industry-level seminars and forums, conducting industry analysis, and on due diligence regulations and other thematic areas such as the priority areas mentioned above and on management systems.
- Cambodia experienced an increasing number of industrial relations issues in the sector related to freedom of association and collective bargaining throughout 2023. Increased understanding and knowledge on HRDD legislation has also contributed to a shift to support factories with effective grievance mechanisms. As such, BFC continued to prioritise strengthening industrial relations, especially around freedom to associate, social dialogue, and grievance mechanisms in 2024. Promoting good industrial relations will continue to support workers and managers in addressing issues in their own factories.
- Gender equality and inclusion also continues to be a key priority for BFC and as a cross-cutting theme across all areas of the work. The programme started rolling out an in-depth GBVH training and the Gender Equality and Returns (GEAR) programme in 2024 with the goal of amplifying BFC's goal to advance gender equality and inclusion.



Annex. Garment factories covered in this report

8 Star Sportswear Ltd. Aeta Apparel Co., Ltd. Agile Sweater (Cambodia) Co., Ltd Allied Max International (Cambodia) Co., Ltd. Apex International (Cambodia) Ltd. (formerly Peace Glory (Cambodia) Manufacturing Co., Ltd) Apple Apparel (Cambodia) Co., Ltd Aurora Apparel (Cambodia) Co.,Ltd. AW Cashmere (Cambodia) Co., Ltd. (formerly GW Rui Xing Co., Ltd.) Bayon Garment Factory Co., Ltd. **Beauty Silk Screen Limited** Beauty Silk Screen Limited (Branch 1) Berry Apparel (Cambodia) Co., Ltd. Bo Hua B (Cambodia) Fashion Co., Ltd. Boeey Garment Co., Ltd. Bowker Garment Factory (Cambodia) Company Limited. Brightness (Cambodia) Garment Factory Co., Ltd. Brilliant HK (Cambodia) Factory Co., Ltd. **Broadland Cambodia Garment** Industries Co., Ltd. Caitac & Wanlin Apparel Co., Ltd Callisto Apparel (Cambodia) Co., Ltd CAM A P I Medical Co., Ltd CAM Forever Co., Ltd. Cambo H.D.Y.L Garment Co., Ltd. Cambo Unisoll Ltd Cambodian Pacific Home Fashion Co., Ltd Cambodian Socks and Underwear Co., Ltd. Cambodian Wuxi Jin Mao Garment Co., Ltd. Capital Garments Co., Ltd.

Caswell Apparel Co., Ltd. CB Kingtop Fashion Garment Co., Ltd. (formerly Tianyan International (Cambodia) Fashion Co., Ltd) Cerie (Cambodia) Garment Co., Ltd CG Glory (Cambodia) Manufacturing Company Limited. (formerly Ford Glory) Champtex (Cambodia) Co., Ltd. Chanco Textiles (Cambodia) Co., Ltd. Chea Sinat Garment Co., Ltd. Cheng Shi Xin Manufacturing (Cambodia) Company Limited Chenghaoshiye (Cambodia) Fashion Co., Ltd. Chhang Sheng Long (Cambodia) Kntting Co., Ltd. Chun Xue (Cambodia) Cashmere Textile Co., Ltd Chuwa (Cambodia) Co., Ltd CIK Cambo Co., Ltd. Cobest (Cambodia) First Garment Co., Ltd. (formerly F.T.E.O Garments and Fortune Teo Garment) Cocovol Apparel (Cambodia) Inc. (Branch 2) Columbus Apparel (Cambodia) Inc. Como Apparel Co., Ltd. Copious (Cambodia) International Inc CPCG International Co., Ltd Credstar Washing & Processing Co., Ltd CS Goldway Textile (Cambodia) Co., Ltd CWKH Garment (Cambodia) Limited CWL AKT (Cambodia) Co., Ltd. Dali Garment International (Cambodia) Limited Dali Garment International (Cambodia) Limited. (Branch 1) Dagian Textile (Cambodia) Co., Ltd.



Dewhirst (Cambodia) Co., Ltd. Di Seta (Cambodia) Co., Ltd. Dongdu Textile (Cambodia) Co., Ltd. Ealytex (Cambodia) Garment Co., Ltd. Easetex (Cambodia) Co., Ltd Eastex Garment Co., Ltd. Eclat Textile (Cambodia) Co., Ltd Elite (Cambodia) Co., Ltd Eminent Garment (Cambodia) Limited Eternal Fame (Cambodia) Garments Co., Ltd. Eucloth International (Cambodia) Garment Co., Ltd. Ever-Synergy (Cambodia) Garments Co., Ltd. Evergreen Garment Co., Ltd. **Evermax Garment Accessories** (Cambodia) Co., Ltd. F.U.G Garment (Cambodia) Co., Ltd Fairdon (Cambodia) Limited Fashiontex Apparel Co., Ltd. (formerly Colour Apparel Garment (Cambodia) Co., Ltd.) Fast Making Co., Ltd. Fengfan (Cambodia) Co., Ltd. Fitly Apparel Co., Ltd. Flourish Garment (Cambodia) Co., Ltd. Foot Forward (Cambodia) Socks Co., Ltd Footmark (Cambodia) Corporation Foremart (Cambodia) Co., Ltd (formerly D & L Ultimate (Cambodia) Co., Ltd) Forever Colour Garment Co., Ltd. Forever FUG Garment Co., Ltd. Fortuna International (Cambodia) Industry Co., Ltd. Fu Hong Embroidery Co., Ltd. Fukki Apparel and Laundry Technology Co., Ltd. Full Ever Textiles (Cambodia) Company Limited

Fushun Cambo Fashion Co., Ltd. G-Evergreat (Cambodia) Knitting Co., Ltd. (formerly G-Evergreen (Cambodia) Knitting Co., Ltd) G.W Greenways Textile Co., Ltd. Gartha International Co., Ltd. GDM Enterprise Co., Ltd. **General Enterprises Garment** (Cambodia) Co., Ltd. GG Fashion (Cambodia) Co., Ltd. Gin-Sovann Fashion (Cambodia) Limited Given Clothing Garment (Cambodia) Co., Ltd. Global Asia Apparel (Cambodia) Co., Ltd. Glory Knitwear Ltd. Golden Grace Apparels Co., Ltd. Golden Island Garments (Cambodia) Co., Ltd. Golden Star Corporate Development (Cambodia) Co., Ltd Goldfame Star Enterprises (Cambodia) Limited Good Plus (Cambodia) Manufacture Co., Ltd. Grace Glory (Cambodia) Garment LTD Grand DW Co., Ltd. (formerly Deuck Woo (Cambodia) Co., Ltd.) Grand Textiles (Cambodia) Co., Ltd. (formerly Grandtex International Co., Ltd.) Grand Twins International (Cambodia) Plc. Great Bestway Manufacturing Co., Ltd. Great New Talent Factory (Cambodia) Co., Ltd. Great Union (Cambodia) Garment Co., Ltd Green Meadow Development (Cambodia) Co., Ltd Green Summit (Cambodia) Limited



Greenfield (Cambodia) Industry Co., Ltd. Guo Tai Hua Sheng Xin Feng Jing (Cambodia) Garment Co., Ltd Guo Tai Sheng Xing (Cambodia) Garment Co., Ltd. Haitan HB (Cambodia) Co., Ltd. (formerly Haitan Garment (Cambodia) Co., Ltd.) Hand 7 Garment Co., Ltd. Hand Seven Apparel Co., Ltd. Harmony (Cambodia) Printing Co., Ltd. Harmony Apparel Co., Ltd. (formerly Kie & Kie World Co., Ltd.) HC Global Textile Co., Ltd. He Li Tuo Knitting Co., Ltd Heart Enterprise (Cambodia) Co., Ltd. Helios Garment (Cambodia) Co., Ltd. Hengnan International Trading (Cambodia) Co., Ltd. Hengwin (Cambodia) Garment Co., Ltd. Hermo (Cambodia) Co., Ltd. Hi-Synergy International Garments Co., Ltd Hi-Tech Apparel (Cambodia) Co., Ltd High Hope (Cambodia) Apparel Manufacturing Co., Ltd. Hing Lee (Cambodia) Co., Ltd. Hong Yu Fang Garment Factory Co., Ltd. Hongs One (Cambodia) Garment Co., Ltd. Horizon Outdoor (Cambodia) Co., Ltd Horseware Products (Cambodia) Co., Ltd. Hua Wu Garment (Cambodia) Co., Ltd. Hui Xin Tu (Cambodia) Fashion Co., Ltd. Humble Apparel Manufacturing Co., Ltd. Hung Hsing Garment (Cambodia) Co., Ltd. Hung Hsing Garment (Cambodia) Co.,

Ltd. (Laundry)

Hung Wah (Cambodia) Garment Manufacturing Ltd. (Branch 1) Hung Yueh Enterprise Co., Ltd. Hwashin Print Co., Ltd. I Apparel Ltd. IGTM (Cambodia) Co., Ltd. In Fong Garment Co., Ltd. In Jae Garment Co., Ltd. In Kyung Cambodia Co., Ltd. Indochine Apparel (Cambodia) Ltd. (formerly Indochine Gawon (Cambodia) Ltd) J.A.K Garment Co., Ltd. Jade Sun Garment (Cambodia) Co., Ltd JD & Toyoshima Co., Ltd JD & Toyoshima Co., Ltd II JH Garment (Cambodia) Co., Ltd. Jian Yuan Tong Garment Co.,Ltd. Jiangyao (Cambodia) Garments Co., Ltd. Jiayuan Hengrun Int,Äôl Textile Co., Ltd. Jie Wei (Cambodia) Garment Factory Ltd. Jifa S. Ok Garment (Cambodia) Co., Ltd Jin Feng Da (Cambodia) Printing Co., Ltd Jin Yunjin (Cambodia) Garment Co., Ltd. Jinmyung Garment Development Corp. Joint Force Sporting Goods (Cambodia) Co., Ltd (formerly Tien Sung Garment (formerly Ming Jian)) Joyance International (Cambodia) Apparel Co., Ltd. Jungkwang Evergreen Garment Co., Ltd. JW Zhongrun (Cambodia) Garment Co., Ltd. K Fine (Cambodia) Garment Company Limited Kaotex Garment Co., Ltd Keme Garment (Cambodia) Co., Ltd. KH Win Star Garment Co., Ltd. King Deer (Cambodia) Knitting Co., Ltd.



King Lian (Cambodia) Garment Factory Co., Ltd. King Success Co., Ltd. (formerly E Garment Co., Ltd.) KKN Apparel Co., Ltd. Knit Resource Management Co., Ltd. Leading Star (Cambodia) Garment Co., Ltd. Leading Star (Cambodia) Garment Co., Ltd. (Branch) Li Kai (Cambodia) Apparel Manufacturing Co., Ltd. Li Qiang Corp Lianfa Hengyu (Cambodia) Garment Co., Ltd Lim Line International (Cambodia) Garment Co., Ltd. Liu Tan International (Cambodia) Co., Ltd Lonso (Cambodia) Garment Co., Ltd. Lucky Laurel Investment Co., Ltd. Lucky Unique Enterprise Co., Ltd. M & V International Manufacturing Ltd. (Kampong Chhnang) Makalot Garments (Cambodia) Co., Ltd. Makalot Garments (Cambodia) Co., Ltd. (Branch 1) Makalot Garments (Cambodia) Co., Ltd. (Branch 3) Man Ou Garment Co., Ltd Marvel Garment Co., Ltd. Max View Textiles (Cambodia) Co., Ltd. Medtecs MSEZ Corp., Ltd. Meng Tong Garment Manufactory Ltd. Meng Yan Garment Manufacturing & Wet Processing Ltd. Mil United Manufacturing Co., Ltd. Moha Garments Co., Ltd. Moon Apparel (Cambodia) Co., Ltd. Moon Tai KJ (Cambodia) Co., Ltd.

Ltd (formerly South Bay Enterprise Co., Ltd.) MT. Yeh's Garment (Cambodia) Co., Ltd Mutita Textile Social Enterprise Co., Ltd Naga Peace Corporation Limited Nagapeace Corporation Limited. (Laundry) Neo Meridian Industries Garments (Cambodia) Co., Ltd. (formerly Meridian Industries Garment) New Era (Cambodia) Cashmere Textile Co., Ltd. New Focus Apparel (Cambodia) Co., Ltd New Fuma Costume (Cambodia) Co., Ltd. New Huamei Knitting & Clothing (Cambodia) Co., Ltd New Rainbow (Cambodia) Co., Ltd. New Sky Printing New Wide (Cambodia) Garment Co., Ltd. New Wide Apparel Co., Ltd. Newest Garment (Cambodia) Co., Ltd. Newtoshi Homewear Co., Ltd. NMD Embroidery (Cambodia) Co., Ltd. (formerly Ming Der Embroidery (Cambodia) Co., Ltd.) Nyan Kids (Cambodia) Ltd. Nyan Kids (Cambodia) Ltd. 1 (formerly Smart Pea Garment Ltd 1) Nyan Kids (Cambodia) Ltd.-2 (formerly Smart Pea Garment Ltd.) Ocean Apparel Manufacturing Co., Ltd. Ocean Apparel Manufacturing Co., Ltd. (Branch 1) Olive Apparel (Cambodia) Co., Ltd Orange Manufacturing (Khmer) Co., Ltd Orient Hongye (Cambodia) Knitting Co., Ltd.

Morning Glory Garment Enterprise Co.,



Orient International Enterprise (Cambodia) Garment Co., Ltd Outdoor Gear (Cambodia) Co., Ltd. P P S E C Company Limited Pacific Apparel Co., Ltd Papillion Textile (Cambodia) Co., Ltd. Peninsula Apparel International Limited Perfect Vision Fashion (Cambodia) Co., Ltd. Polaris Apparel Co., Ltd. (formerly Lu Thai (Cambodia) Co., Ltd) Powerful Riches Garment (Cambodia) Co., Ltd. Prestige Garment Co., Ltd. Qian Qun Huang Jia Co., Ltd. Qingdao Roy Ne (Cambodia) Garment Co., Ltd. Qins Textile (Cambodia) Co., Ltd. QMDJ (Cambodia) Co., Ltd. Quantum Clothing (Cambodia) Ltd. (formerly New Island Clothing, Ltd.) Quint Major Industrial Co., Ltd. Qun Ding Printing Co., Ltd R.K.T (Cambodia) Co., Ltd. Reliable Source Industrial (Cambodia) Co., Ltd Remstex Fashion Co., Ltd. Rong Win Garment Co., Ltd. Runsing Knitting International Co., Ltd. S W J (Cambodia) Garment Co., Ltd. S.P. Brother (Sisophon) Co., Ltd S.Y Embroidery Co., Ltd Samaritan Textile (Cambodia) Co., Ltd. Samil Cambo Co., Ltd. (formerly Direct Int'l & ACE Apparel) Sanjin (Cambodia) Knitting Technology Co., Ltd. Seduno Cambo Knitting Co., Ltd Seduno Investment Cambo Fashion Co., Ltd.

Seeds Garment (Cambodia) Co., Ltd. Sees Global (Cambodia) Co., Ltd. Sew Good Garment Co., Ltd. Shanda (Cambodia) Textile Co., Ltd. Shanghai Ch Garment (Cambodia) Co., Ltd Shanghai Sunwin Firstex (Cambodia) Co., Ltd. Sheico (Cambodia) Co., Ltd. Shen Da Heng Yuan Garment Co., Ltd. Sheng Huang Industries Co., Ltd Shi Yang Industrial (Cambodia) Co., Ltd. Shining Fashion Industrial Co., Ltd. Shuang Li (Cambodia) Garment Co., Ltd Shuang Li One (Cambodia) Garment Co., Ltd. Silver Age Knitting Co., Ltd. Sincere Season (Cambodia) Garment Co., Ltd. Sinokh Perfect Garment Co., Ltd. (formerly Ginwin Industry (Cambodia) Co., Ltd (Branch 2)) Sinoproud Apparel (Cambodia) Co., Ltd. Sky Clothing (Cambodia) Co., Ltd. (formerly Sigil (Cambodia) Garment Manufacturing Co., Ltd) Skyline Apparel Co., Ltd Skytex Silk Screen Co., Ltd Skyworth Fashion (Cambodia) Co., Ltd. Smart Shirts Garments Manufacturing (Cambodia) Co., Ltd (formerly Sunn Lung Garment Co., Ltd.) Soho Sheng He (Cambodia) Garment Co., Ltd (formerly Fong Yean (Cambodia) Garment Co., Ltd.) Son Keng Garment (Cambodia) Co.,Ltd. Sound 868 Co., Ltd. Southland (Cambodia) Co., Ltd. (Formerly Universal Apparel) Splendid Chance International Ltd.



Splendor Industry Co., Ltd. Sportex Industry Co., Ltd. Sportline Apparel (Cambodia) Co., Ltd. Starlight Apparel Manufacturing Co., Ltd. Starlight Apparel Manufacturing Co., Ltd. (Branch 1) Steps Footsocks Asia Co., Ltd Sun Hsu Garment Co., Ltd Sun World Garment Co., Ltd. Sunicon (Cambodia) Apparel Co., Ltd. Suntex Pte., Ltd. Super Link Fashions (Cambodia) Co., Ltd Surpassing Garment Factory Co., Ltd. Suzen (Cambodia) Industrial Co., Ltd. Swany (Cambodia) Corporation SYSG Garment Company Limited (formerly Bing Win Garment (Cambodia) Co., Ltd.) T & K Garment Industry Co., Ltd. T.F.G (Cambodia) Garment Co., Ltd. T.S Sport (Cambodia) Co., Ltd. Tae Young (Cambodia) Co., Ltd. Taieasy International Co., Ltd Tainan Enterprises (Cambodia) Co., Ltd. Tao and Kiven Garment Co., Ltd. Texson (Cambodia) Knitting Washing Dyeing & Printing Co., Ltd. Textstar Garment (Cambodia) Co., Ltd. The Soul Gear (Cambodia) Co., Ltd. Three Plus Development (MFG) Limited Tokokosen Garments (Cambodia) Co., Ltd. Top Form (Cambodia) Manufacturing Company Limited. Top Sports Textile Ltd. Top Summit Garment Inc. TOWA (Cambodia) Co., Ltd.

Toyoki Apparel (Cambodia) Co., Ltd. (formerly Golden Apparel (Cambodia) Ltd.)

Trax Apparel (Cambodia) Co., Ltd. Trimax Apparel (Cambodia) Co., Ltd. Tung Choi Fashion Technology Co., Ltd Twin Win Textile Co., Ltd. (formerly Gracy Wise Textile Co., Ltd) TY Fashion (Cambodia) PLC. (formerly No.4 and No.5) U-Knits (Cambodia) Co., Ltd Unicorn (Cambodia) Recreation Products Co., Ltd Unity Fashion Cambo Co., Ltd V.C.O.F.F Apparel Co., Ltd. Vanco Industrial Co., Ltd. Vicmark Fashions (Cambodia) Co., Ltd. W & D (Cambodia) Co., Ltd. W.Embellishment Ltd. Walt Technology (Cambodia) Co., Ltd. Wan He Da Manufacturing Company Limited (Merged with Jit Textiles Limited) Wanlin-Zongheng (Cambodia) Garment Factory Co., Ltd Wedge Global Apparel Co., Ltd. Wellson Global Co., Ltd. Win Sheng Garment Process Finish Co., Ltd. Winas Garment Co., Ltd Windmill-FY (Cambodia) Garments Co., Ltd. Wing Ying (Cambodia) Garment Factory Ltd. Winsand Garment & Woolen Knitting Factory Co., Ltd. Wintai Sock Manufacture Ltd (formerly Blossom Century (Cambodia) Ltd.) WTX Leading Fashion Co., Ltd. WTX Leading Fortune Co., Ltd.



X.Y.H. (Cambodia) Garment Co., Ltd. Xin Hai Tong Clothing (Cambodia) Co., Ltd. (formerly Wanshen Clothing (Cambodia) Co., Ltd)

Xin Hongrui (Cambodia) Garment Co., Ltd.

Xin Li Fang (Cambodia) Garment Co., Ltd.

Xin Wei Jie Co., Ltd.

Xin Yunfeng (Cambodia) Fashion Co., Ltd.

Xinyao Union (Cambodia) Garment Co., Ltd.

Xinyongsheng Garment (Cambodia) Co., Ltd.

Xinzhongying Embroidery & Textile Co., Ltd.

Xo Tex Industrial Co., Ltd.

Y & W Garment Co., Ltd. (Merged with Y & W Garment Co., Ltd. (D)) Y.L. Labels (Cambodia) Co., Ltd

Yakjin (Cambodia) Inc.

Yao Hua Print Work

Yi Da Manufacturer Co., Ltd

Ying Yi Industry Co., Ltd. (formerly Perfecta (Cambodia) Garment Co., Ltd) YNTEX Co., Ltd. Yong De Wei Garment PTY LTD Yorkmars (Cambodia) Garment MFG Co., Ltd. Yorks (Cambodia) Co., Ltd. You Li International (Cambodia) Garment Co., Ltd You Qi Silkscreen Co., Ltd (formerly S.A.C. Co., Ltd.) Young Clothing (Cambodia) Co., Ltd. YTC Corporation. Yun Ter Garment Co., Ltd. (formerly Hui Yuan Garment Co., Ltd) Zhen Tai Garment (Cambodia) Co., Ltd. Zheng Yong Garment Factory (Branch 1) ZJ S&Y (Cambodia) Garments Co., Ltd. (formerly S-Yuan (Cambodia) Apparel Manufacturing Co., Ltd)



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